

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

Volume 6 – Full Representations on Appendices

August 2026



RLDP

CDLN



Introduction to Representations Register

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

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 It also excludes representations that have been withdrawn.

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

Volume 1 provides a summary of all representations.

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

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

The Volumes are as follows:

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

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

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

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

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

6087

Comment

Document Element: Deposit Plan Documents, Deposit Plan - Appendices**Respondent:** Barratt Redrow Homes [2669]**Agent:** Lichfields**Summary:**

The RLDP housing trajectory shows a significant increase in delivery from about 200 dwellings per annum in 2025-26 and 2026-27 to approximately 1,000 dpa from 2027/28 to 2030/31. To achieve this, more available sites should be allocated in sustainable settlements, specifically land at Primrose Hill in Cowbridge, which can provide up to 220 dwellings at 50 per year. Including Primrose Hill in the RLDP would help ensure the plan's delivery and meet the third soundness test.

Full text:

This comment relates to Appendix 1 of the RLDP – Housing Land Supply and Housing Trajectory:

The housing development trajectory for the RLDP period in Appendix 1 shows a sharp increase in housing delivery from circa 200 dpa in 2025-26 and 2026-27 to circa 1,000dpa in years 2027/28 to 2030/31. The best way to ensure delivery of 1,000 dpa will be achieved is through the allocation of more readily available housing sites in sustainable settlements. Land at Primrose Hill, which is located at the Service Centre Settlement of Cowbridge, is available now to assist with meeting the housing development trajectory and can deliver up to 220 dwellings at a rate of 50 per annum.

The inclusion of Land at Primrose Hill as an additional housing allocation in the RLDP would assist in ensuring that the RLDP meets the third test of soundness (Will the Plan deliver?).

Attachments: None

6588

Comment

Document Element: Deposit Plan Documents, Deposit Plan - Appendices**Respondent:** Councillor Stephen Haines [1029]**Summary:**

Monitoring Framework Enhancement

Include specific indicators for:

- Sustainable transport modal share.
- Retail provision delivery.
- Open space replacement.
- Infrastructure phasing compliance.

Full text:

1. Section of Plan to which this Representation Relates

- Sustainable Growth Strategy
- Key Housing Sites:
 - KS4 - Land at Church Farm, St. Athan (532 dwellings)
 - KS5 - Land to the West of St. Athan (600 dwellings)
- Housing Allocations: HG1(7)
 - Former Stadium Site, adjacent to Burley Place (80 dwellings)
 - HG1(8) - Clive Road, St. Athan (51 dwellings)
- Transport Policy (TR)
- Community Infrastructure Policy (CI)
- Policy SP13 - Infrastructure Provision
- Green Infrastructure Policies

2. Summary of Representation

This representation raises concerns regarding:

1. The scale of housing growth in St. Athan.
2. The absence of guaranteed sustainable transport infrastructure.
3. Insufficient retail and community infrastructure provision, particularly within the ward of Flemingston.
4. The allocation of the Clive Road site (HG1(8)), which currently functions as a de facto village green.
5. The cumulative infrastructure impact of candidate and legacy site allocations.

The representation seeks modifications to ensure the Plan is infrastructure-led, deliverable, and compliant with national planning policy and the Well-being of Future Generations (Wales) Act 2015.

3. Scale of Housing Growth in St. Athan

The RLDP allocates:

- KS4 - 532 dwellings
- KS5 - 600 dwellings
- HG1(7) - 80 dwellings
- HG1(8) - 51 dwellings

This equates to 1,263 dwellings in St. Athan.

This represents a very significant expansion of the settlement and must be assessed against:

- Existing infrastructure capacity
- Transport provision
- Education and healthcare availability
- Retail and service provision

At present, St. Athan does not have a rail station and relies heavily on private car travel.

The Plan must demonstrate clearly that this level of growth is proportionate and deliverable.

4. Transport Infrastructure and Deliverability

The RLDP safeguards land for a "transport interchange" at St. Athan. However:

- There is no confirmed rail station.
- There is no confirmed funding package.
- There is no defined delivery programme.
- There are no binding occupation triggers linking housing delivery to transport delivery.

Previous references in planning documents referred to a railway station. The revised terminology of "transport interchange" reflects uncertainty.

Under Future Wales - The National Plan 2040, growth within the South East National Growth Area should align with sustainable transport infrastructure. Without guaranteed rail provision, development risks being car-dependent and inconsistent with decarbonisation objectives.

This raises concerns under the soundness test: Will the plan deliver?

5. Retail and Local Service Provision - Flemingston Ward

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.

Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:

- No corresponding neighbourhood retail allocation.
- No clear commitment to small-scale convenience retail within walking distance of new development.
- No spatial recognition of Flemingston's service deficit.

This is inconsistent with Planning Policy Wales placemaking principles, which require:

- Mixed-use neighbourhoods.
- Walkable access to daily services.
- Reduced reliance on private vehicles.

Without provision of much-needed retail units within Flemingston ward, residents will remain dependent on car travel for everyday needs.

Modification is therefore sought to require neighbourhood retail and service provision proportionate to housing growth.

6. Clive Road Site (HG1(8)) - Community Function

The Clive Road site (HG1(8), 51 dwellings) currently functions as a de facto village green.

Although not formally designated, it is:

- Used informally for recreation.
- A visual open space within the settlement.
- A valued community amenity.

Its allocation for housing would result in:

- Loss of accessible informal open space.
- Erosion of community character.
- Reduction in green infrastructure connectivity.

The Plan should:

- Reassess the allocation in light of its community use; or
 - Require equivalent or superior replacement open space within immediate proximity prior to development.
- This matter engages Policy on Open Space and Green Infrastructure and must be considered in accordance with the prevention and long-term principles of the Well-being Act.

7. Candidate and Legacy Sites - Cumulative Impact Several allocations in St. Athan arise from:

- The Candidate Site process.
- Rolled-forward legacy allocations.

Individually, smaller sites may appear acceptable. However, cumulatively they produce substantial growth in a settlement with constrained infrastructure.

The Plan must demonstrate:

- Why these sites were preferred over alternatives.
- That lower growth options were robustly assessed.
- That greenfield loss is justified and mitigated.

8. Infrastructure and Phasing Concerns

Policy SP13 refers to securing infrastructure through planning obligations. However, reliance on financial contributions alone does not ensure timely delivery.

There is insufficient clarity regarding:

- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

Infrastructure must be delivered ahead of, or in tandem with, housing occupation - not retrospectively.

9. Compliance with the Five Ways of Working

Long-Term: Irreversible greenfield expansion without secured sustainable transport risks embedding long-term car dependency.

Prevention: Without infrastructure-first sequencing, congestion and service strain are foreseeable.

Integration: Housing growth appears to run ahead of confirmed transport and retail provision.

Collaboration: The Plan should demonstrate binding commitments from transport and infrastructure partners.

Involvement: Community concerns regarding scale and open space loss must be properly addressed.

10. Modifications Sought

To ensure soundness and compliance with national policy, the following modifications are requested:

1. Phasing Policy for KS4 and KS5

Introduce clear occupation thresholds tied to delivery of:

- Transport interchange infrastructure.
- Highway mitigation. Education capacity.
- Healthcare provision.

2. Retail Provision Requirement

Require neighbourhood retail and service provision within the ward of Flemingston proportionate to allocated and previous housing growth.

3. Clive Road Site Review (HG1(8))

Either:

- Remove the allocation; or
- Require replacement open space of equal or greater quality delivered prior to development.

4. Strengthened Infrastructure-First Wording

Amend Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.

5. Monitoring Framework Enhancement Include specific indicators for:

- Sustainable transport modal share.
- Retail provision delivery.
- Open space replacement.
- Infrastructure phasing compliance.

11. Conclusion

St. Athan has a role within the wider Cardiff Capital Region and the South East National Growth Area. However, the current scale of housing allocation is not sufficiently matched by guaranteed infrastructure, retail provision, or community space protection.

Without modification, the Plan risks:

- Car-dependent growth,
- Loss of valued open space,
- Insufficient local retail provision,
- Pressure on community infrastructure.

This representation therefore seeks amendments to ensure that growth in St. Athan and Flemingston is proportionate, infrastructure-led, environmentally responsible, and compliant with Welsh planning policy.

Attachments:

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

Document Element: Deposit Plan Documents, Deposit Plan - Appendices

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Asbri Planning

Summary:

Deposit Plan Appendix 1 - Housing Trajectory KS1

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

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

Full text:

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

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

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

Background

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

Sustainable Growth Strategy (Policy SP1)

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

Overall Growth Levels (Policy SP6)

It is acknowledged that the preferred growth option (dwelling-led 10 Year scenario), upon which the RLDP housing requirement figure is based, reflects what has been delivered in the Authority in recent years, and is considered by the Authority to be realistic and suitably ambitious given the Vale's position within the National Growth Area. However, as a general comment, it is considered that targeting a higher/more ambitious growth rate would be appropriate. In reviewing the most recent LDP Annual Monitoring Report (Vale of Glamorgan LDP 2011-2026, 7th Annual Monitoring Report, 1st April 2024 31st March 2025) (published October 2025), it is clear that there is a shortfall in housing delivery in the Vale of Glamorgan. It is stated that: "Between 1st April 2011 and 1st April 2025, a total of 6,999 dwellings were completed within

the Vale of Glamorgan of which 4,641 units were general market dwellings against the 2025 AMR target of 6,387 that should have been developed at this point in the plan period, in accordance with the target. The number of additional general market dwellings delivered is 27.3% below the monitoring target”.

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

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

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

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

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

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

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

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

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

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

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

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

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

within the site layout. As such, it is requested that the prescriptive nature of the above bullet point is mended to allow for the RSL to advise on best practice.

- Provision of land across the site frontage to allow for the widening of the A4226 Port Road West and the delivery of an Active Travel route across the frontage of the site as part of the Weycock Cross to Cardiff Airport Active Travel route, as identified in Policy TR1 (relating specifically to the delivery of the section of the Active Travel route adjoining the northern boundary of the Key Site only).
- Creation of a new signalised junction on to the A4226 Port Road West, which will need to accommodate controlled pedestrian/cycle crossing facilities.

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

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

Suggested additional text is outlined in red above.

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

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

Suggested additional text is outlined in red above.

- A contribution towards off-site sustainable transport measures in the area (as necessary and related to the Key Site).

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

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

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

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

Furthermore, it is not considered appropriate that the policy wording should refer specifically to the financial contribution towards the management of this land, in addition to its transfer, as such contributions will be subject to detailed viability

appraisal work at the Planning Application stage.

Deposit Plan Appendix 1 - Housing Trajectory

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

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

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

Deposit Plan Appendix 2 – Infrastructure Delivery Plan

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

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

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

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

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

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

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

- Education – Estimated Cost Circa £3,730,000 (£TBC)

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

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

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

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

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

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

Policy CC1 – Residential Operational Net Zero Carbon Development

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

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

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

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

Summary

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

As set out within this representation, overall support is provided for the Deposit Plan (and the inclusion of North West Barry as a Key Site), however, as detailed, objections are submitted in relation to the specific elements of the proposed wording of the Key Site policy (SP4: KS1).

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

Attachments:

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

Summary:**Deposit Plan Appendix 2 – Infrastructure Delivery Plan**

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

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

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

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

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

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

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

- Education – Estimated Cost (£TBC) - DELETE COST CITED

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

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

- VOGC to deliver improvements to junctions on the Strategic Highways Network using s106 contributions (from the North West Barry Key Site and other relevant commitments) .

As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development.

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

The requirement for a contribution towards off-site measures 'in the area' is not specific enough to provide certainty for the developer, and it will be important to ensure that any off-site measures are necessary and directly related to the North West Barry development.

Community Facilities – (£TBC) DELETE COST CITED

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

Full text:

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

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

We would highlight that although the representation provides overarching support for the Deposit Plan (and the inclusion of North West Barry as a Key Site), a number of detailed objections are submitted in relation to

specific elements of the proposed wording of the Key Site policy (HG1: KS1). In addition, the wider policies of the Deposit Plan have been reviewed in detail and comments are submitted accordingly.

Background

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

Sustainable Growth Strategy (Policy SP1)

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

Overall Growth Levels (Policy SP6)

It is acknowledged that the preferred growth option (dwelling-led 10 Year scenario), upon which the RLDP housing requirement figure is based, reflects what has been delivered in the Authority in recent years, and is considered by the Authority to be realistic and suitably ambitious given the Vale's position within the National Growth Area. However, as a general comment, it is considered that targeting a higher/more ambitious growth rate would be appropriate. In reviewing the most recent LDP Annual Monitoring Report (Vale of Glamorgan LDP 2011-2026, 7th Annual Monitoring Report, 1st April 2024 31st March 2025) (published October 2025), it is clear that there is a shortfall in housing delivery in the Vale of Glamorgan. It is stated that: "Between 1st April 2011 and 1st April 2025, a total of 6,999 dwellings were completed within the Vale of Glamorgan of which 4,641 units were general market dwellings against the 2025 AMR target of 6,387 that should have been developed at this point in the plan period, in accordance with the target. The number of additional general market dwellings delivered is 27.3% below the monitoring target".

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

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

In terms of future housing need, on average, between 7,800 and 9,300 additional housing units are estimated to be needed annually over the five-year period from July 2025 to June 2030, with a central estimate of 8,700 from newly arising need. The estimated newly arising need for July 2025 to June 2030 is higher than in the 2019-based estimates. This increase reflects higher projected household growth in the 2022-based household projections compared with the 2018-based projections used previously. The Authority will need to give detailed consideration to the implications of the updated estimates of housing need. As the most up to date projections, the Replacement LDP must properly account for the

new dataset to ensure soundness of the plan. In this regard, it is stated at Paragraph 5.34 of the Development Plans Manual that "In terms of considering the level of housing provision for a plan, the most up-to-date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base."

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

In light of the February 2026 publication of updated estimates of housing need in Wales (which indicate

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

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

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

inclusion of KS1 as a housing allocation in the Deposit Plan is therefore welcomed and supported.

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

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

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

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

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

The policy as currently worded is considered to be overly prescriptive with regards to the positioning of affordable units on the site. It is the case the Registered Social Landlord who is responsible for the delivery and ongoing operation/management of the affordable units is best-placed to advise upon the positioning of the affordable units within the site layout. As such, it is requested that the prescriptive nature of the above bullet point is mended to allow for the RSL to advise on best practice.

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

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

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

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

Suggested additional text is outlined in red above.

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

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

Suggested additional text is outlined in red above.

- A contribution towards off-site sustainable transport measures in the area (as necessary and related to the Key Site).

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

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

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

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

Furthermore, it is not considered appropriate that the policy wording should refer specifically to the financial contribution towards the management of this land, in addition to its transfer, as such contributions will be subject to detailed viability appraisal work at the Planning Application stage.

Deposit Plan Appendix 1 - Housing Trajectory

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

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

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

Deposit Plan Appendix 2 – Infrastructure Delivery Plan

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

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

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

highway network).

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

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

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

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

- Education – Estimated Cost Circa £3,730,000 (£TBC)

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

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

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

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

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

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

Policy CC1 – Residential Operational Net Zero Carbon Development

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

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

Policy CC1 could also lead to inconsistent energy performance requirements across Local Planning

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

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

Summary

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

As set out within this representation, overall support is provided for the Deposit Plan (and the inclusion of North West Barry as a Key Site), however, as detailed, objections are submitted in relation to the specific elements of the proposed wording of the Key Site policy (SP4: KS1).

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

Attachments:

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

7226

Comment

Document Element: Deposit Plan Documents, Deposit Plan - Appendices

Respondent: Ms Lynne Squires [3520]

Summary:

The Plan does not clearly explain how progress will be monitored or how changes will be made if things do not go as planned. For example, if housing delivery is slower than expected or infrastructure is delayed, there is little information on how allocations or policies would be adjusted.

Full text:

1. Air Quality and Traffic

The RLDP has not been supported by a sufficiently robust, transparent and locally specific evidence base in relation to traffic capacity, mitigation, air quality and sustainable transport delivery in Dinas Powys. The Plan relies on high-level assumptions rather than detailed assessments of known local constraints, and it does not provide adequate certainty that necessary mitigation and sustainable transport measures will be delivered, funded and implemented in a timely manner.

As a result, there is a significant risk that the cumulative impacts of development will lead to increased congestion, adverse effects on air quality and a deterioration in the quality of life for existing and future residents.

Until these evidence gaps are addressed and clear, enforceable measures are put in place, the RLDP cannot be considered fully justified, effective or consistent with national policy in its application to Dinas Powys.

Traffic Capacity

I am concerned that the RLDP has not demonstrated that the existing road network in Dinas Powys can cope with the scale of development proposed. Roads and junctions within the village already experience significant congestion both at peak times and throughout the day, particularly along Cardiff Road, St Andrew's Road and the A4055.

The Plan does not provide clear or accessible evidence, such as detailed junction capacity assessments or peak-hour traffic modelling, to show that additional development will not worsen these problems. Without this information, I cannot be confident that growth can be accommodated without unacceptable impacts on daily travel, safety and quality of life.

Questions: Can the Council confirm that the existing highway network in Dinas Powys can accommodate the growth proposed in the RLDP without causing unacceptable congestion?

Can the Council provide evidence including junction capacity assessments and peak hour traffic modelling?

Mitigation Measures

Where development in Dinas Powys is likely to increase traffic, I am concerned that the RLDP does not clearly explain how congestion will be mitigated.

Mitigation measures are described in general terms, but there is little clarity on what will actually be delivered, when it will happen, or who will pay for it. There is also no clear reassurance that mitigation will be in place before development takes place.

I am concerned that traffic conditions could deteriorate further if development proceeds without effective safeguards. Questions: For any development allocations in Dinas Powys that may impact congestion, what measures are proposed to mitigate these effects?

Are these measures fully funded, deliverable, and enforceable?

Air Quality Impacts

Increased traffic has clear implications for local air quality, particularly in residential areas and near schools and community facilities. I am concerned that the RLDP has not clearly assessed how the proposed growth in Dinas Powys will affect air quality, especially when the cumulative impact of multiple developments is considered.

The Plan does not explain how compliance with statutory air quality standards will be monitored or maintained as traffic levels increase. This creates significant uncertainty about potential impacts on public health and the local environment.

Questions: Has the Council assessed the likely impact of the proposed growth on local air quality in Dinas Powys, including cumulative effects?

How will the Plan ensure compliance with statutory air quality standards?

Sustainable Transport

While the RLDP refers to encouraging walking, cycling and public transport, I am not convinced that realistic alternatives to car/motor use will be delivered in Dinas Powys.

There is limited detail on specific improvements, timescales or funding for sustainable transport. Without frequent, reliable public transport and safe, direct walking and cycling routes, it is unlikely that car use will reduce in practice.

As a result, traffic growth and air quality impacts may be greater than the Plan assumes.

Question: How does the Plan/Council intend to ensure that sustainable travel options (walking, cycling, public transport) will be delivered and used to reduce traffic and air quality impacts in Dinas Powys?

Evidence Gaps

Overall, I am concerned that key evidence relating to traffic and air quality in Dinas Powys is either missing or insufficiently detailed. Without clear, locally specific assessments, it is difficult to understand how the Council can be confident that the Plan is sound or that its impacts on the community are acceptable.

Question: There are limitations in the transport and air quality evidence for Dinas Powys, how does the Council justify that the RLDP remains sound in light of these uncertainties?

2. Flood risk

I am concerned about the Replacement Local Development Plan (RLDP) and its impact on Dinas Powys, in relation to flood risk.

Dinas Powys already experiences surface water flooding, overloaded drains and pressure on local watercourses. Any new development must be proven to be safe and must not make these problems worse. At present, the RLDP does not give me confidence that this has been properly addressed.

Flood Risk Has Not Been Properly Resolved

Welsh Government policy (TAN 15) says new development must be safe from flooding for its lifetime and that flood risk should be dealt with when the Plan is written, not later on.

The RLDP appears to allocate sites that are affected by flood risk without clearly showing how they can be made safe.

Instead, it relies on the idea that solutions will be worked out later when planning applications are submitted. As a resident, this is worrying, as there is no guarantee that those solutions will ever work or be delivered.

Questions: Can the Council explain how allocations within [or affecting] TAN 15 flood risk areas comply with TAN 15's requirement that development be flood-safe for its lifetime, rather than relying on mitigation to be designed later?

Where the Plan relies on mitigation to address flood risk, what evidence demonstrates that such mitigation is deliverable, funded, and capable of implementation within the Plan period?

Is it the Council's position that compliance with TAN 15 can be deferred to the planning application stage, and if so, how does that align with the requirement for strategic flood risk to be resolved at plan-making stage?

Lack of Clear Evidence Behind Flood Assessments

The flood studies supporting the Plan are not easy for a lay person to understand and do not clearly show that the full impact of new development has been properly assessed.

In particular, it is unclear whether:

- The combined effect of multiple new developments has been considered
- The worst-case impacts of climate change and heavier rainfall have been tested
- Flood risk to existing homes and streets has been fully taken into account

Without this information, it is hard to see how the Council can be confident that new development will not increase flooding in Dinas Powys.

Questions: What level of modelling underpins the SFCA, and can the Council confirm whether it assesses downstream and off-site impacts arising from cumulative development?

Does the SFCA test a 'worst-case' climate change scenario consistent with current Welsh Government guidance, and if not, why not?

How does the SFCA move beyond a desktop exercise to demonstrate that individual allocations are genuinely developable without increasing flood risk elsewhere?

Too Much Reliance on Future Drainage Solutions

The Plan relies heavily on Sustainable Drainage Systems (SuDS) to manage surface water, but there is little evidence showing that these systems can realistically work on all proposed sites.

I am concerned that:

- There may not be enough space on sites for effective drainage
- Water will still end up flowing into already stretched drains and streams
- Long-term maintenance of drainage systems is unclear

If these systems fail or are not properly maintained, flooding problems could become worse over time.

Questions: What evidence does the Plan rely on to show that SuDS can be accommodated on all relevant allocations without loss of developable area or displacement of flood risk?

Has the capacity of receiving watercourses and drainage networks been assessed at a strategic level, or is this assumed to be resolved site-by-site?

How does the Plan address the cumulative impact of multiple SuDS systems discharging into the same catchment?

What mechanisms are proposed to secure long-term maintenance of SuDS, and where is this evidenced in the Plan?

Doubts About Whether Sites Are Truly Deliverable

Some housing numbers in the Plan appear to depend on sites that may only work if major flood prevention measures are put in place, I believe that Dinas Powys is an example of this.

- It is not clear which sites depend on such measures
- There is no clear timetable or funding in place
- There is no backup plan if flood mitigation does not happen

I am concerned that the Plan may be relying on sites that cannot realistically be developed.

Question: Can the Council identify which allocations are dependent on flood mitigation infrastructure, and where the delivery, timing, and funding of that infrastructure are set out?

If mitigation fails to come forward, what contingency does the Plan provide to ensure housing delivery does not rely on undeliverable sites?

How does the Plan demonstrate that housing numbers are not inflated by sites whose flood risk constraints may ultimately prevent development?

Where NRW has expressed concerns or conditions relating to flood risk, how has the Council reflected those concerns in policy or allocations, rather than deferring them to later stages?

Has any NRW advice been departed from, and if so, what is the evidence base justifying that departure?

Climate Change and Long-Term Safety

Flooding is likely to become more frequent and severe due to climate change. The Plan does not clearly show that new development in or around Dinas Powys will remain safe for decades to come, not just during the Plan period.

Residents need reassurance that today's decisions will not create long-term flooding problems for future generations.

Question: How does the Plan ensure resilience to increased rainfall intensity and flood frequency over the full lifetime of development, not just the Plan period itself? Does the Plan assume future flood defences or upgrades, and if so, where are those projects committed and funded?

For these reasons, I believe the RLDP has not properly resolved flood risk issues affecting Dinas Powys, I ask that the Council be required to:

- Properly address flood risk at the plan-making stage, not later
- Remove or review sites where flood risk has not been clearly resolved
- Provide stronger evidence that new development will not increase flooding for existing residents.

Until this is done, the Plan cannot be considered sound.

3. Wastewater Treatment

This objection relates to the proposed level of housing growth in Dinas Powys and whether the existing wastewater and sewerage system can safely and realistically support it.

I am concerned that the RLDP does not provide clear, settlement-specific evidence to show that wastewater treatment works and the local sewer network have enough capacity to accommodate the planned development, either now or within the Plan period.

Without this evidence, the Plan risks placing unacceptable pressure on already constrained infrastructure, increasing the risk of flooding and environmental harm.

Wastewater Treatment Capacity

The RLDP does not clearly explain whether the wastewater treatment works serving Dinas Powys has sufficient spare capacity to deal with additional development.

In particular, the Plan does not set out:

- how much wastewater the treatment works is currently allowed to treat (its "consented capacity"),
- how much spare capacity is actually available,
- when this information was last assessed, or
- whether this assessment has been formally confirmed by Dŵr Cymru Welsh Water.

Without this basic information, I lack sufficient information to understand whether the existing system is already close to capacity or whether it genuinely has room to cope with new development.

The Plan also does not clearly state how much additional wastewater would be generated by the new housing proposed for Dinas Powys, or how this compares with any available capacity. This makes it impossible to judge whether the level of growth proposed is realistic.

There is no clear evidence that a Dinas Powys-specific assessment has been carried out. If the Council is relying on broad, county-wide modelling instead, this does not reflect local conditions or known issues within the village.

Sewer Network Constraints & Flood Risk

Many residents are already aware of problems with drainage, surface water, and sewer performance in Dinas Powys, particularly during periods of heavy rainfall.

However, the RLDP does not provide clear evidence on:

- existing sewer surcharging or flooding incidents,
- past or current problems with overloaded sewers, storm overflow activity affecting the area.

There is also no clear explanation of how the combined impact of multiple new development sites in Dinas Powys has been assessed together, rather than individually. This is especially concerning given the increasing frequency of intense rainfall linked to climate change.

Dinas Powys has known surface water and flood risk sensitivities, yet the Plan does not convincingly demonstrate that increased wastewater flows will not make flooding worse or lead to pollution of local watercourses.

I am concerned that problems will only become apparent after development has already taken place.

Deliverability & Infrastructure Planning

The RLDP does not identify any specific wastewater or sewerage upgrades needed to support the proposed growth in Dinas Powys.

Where upgrades may be required, the Plan does not explain:

- what infrastructure improvements would be needed,
- how much they would cost,
- who would pay for them, or
- when they would be delivered.

This creates significant uncertainty. I am concerned that development could go ahead before infrastructure is in place, leaving existing communities to deal with the consequences of overloaded systems.

There is also no clear explanation of how infrastructure will be phased to ensure that wastewater capacity is available before new homes are occupied, rather than relying on solutions being found later.

Role of the Statutory Undertaker – Dŵr Cymru Welsh Water

The Plan appears to rely heavily on future discussions with Dŵr Cymru Welsh Water at the planning application stage to resolve wastewater issues.

I am concerned that this approach puts off important decisions that should be made now, during the Plan-making process. National planning policy requires development plans to be based on a clear understanding of infrastructure capacity, not assumptions that problems can be fixed later.

Without clear, written confirmation from Dŵr Cymru Welsh Water that the proposed level of growth in Dinas Powys can be accommodated, I believe the Plan lacks the certainty needed to be considered sound.

Soundness & Policy Compliance

Because the RLDP does not clearly demonstrate that wastewater infrastructure:

- is available,
- can be upgraded in time, and
- has a realistic and funded delivery plan,

I do not believe the Plan is effective, which is a key test of soundness.

The Plan also appears to conflict with Planning Policy Wales, which states that development should be directed to locations where infrastructure is already in place or can be secured.

Deferring wastewater solutions to a later stage does not meet this requirement.

If wastewater capacity problems cannot be resolved within the Plan period, I question why the level of development proposed for Dinas Powys has not been reduced to reflect real infrastructure constraints.

4. Green Space & Green Infrastructure

For the reasons set out below I consider that the RLDP is unsound in relation to green space and green infrastructure in Dinas Powys because it:

- Fails to justify the loss of existing green space or show that mitigation will be delivered;
- Lacks clear evidence on the quantity, quality, and accessibility of green space;
- Does not safeguard the integrity of green infrastructure networks;
- Provides no mechanisms to ensure timely delivery of green space alongside new development;
- Does not demonstrate that alternatives were properly considered through the Sustainability Appraisal.

Until these issues are addressed, there is no clear basis to conclude that the proposed growth in Dinas Powys can be accommodated without unacceptable impacts on local green spaces and the wider environment.

I urge the Council to carefully consider these concerns and provide further evidence or modifications to ensure that the Plan is effective, sustainable, and compliant with national planning policy

Protection of Existing Green Space

The RLDP does not clearly explain why any existing green spaces in Dinas Powys might be lost, or whether the loss is unavoidable.

I am concerned that the Plan does not demonstrate:

- that all alternatives to protect existing green space have been considered, or
- that any replacement or mitigation will be provided within or near the village.

Without this evidence, there is no assurance that valued local green spaces, which are important for recreation, biodiversity, and the character of the settlement, will be preserved. This is a serious omission that makes the Plan unsound in this respect.

Question: How does the Plan justify the loss of any existing green spaces in Dinas Powys? Has an assessment been carried out demonstrating that loss is unavoidable, and that adequate replacement or mitigation will be provided within or near the settlement?

Quantity, Quality, and Accessibility of Green Space

The RLDP does not provide clear, settlement-specific information about the amount, quality, or accessibility of green space for Dinas Powys residents.

It is unclear whether the standards being applied:

- meet national policy requirements,
- reflect the needs of the local population, or
- will be sufficient to support an increased population from new housing.

Without clear evidence, I cannot be confident that new development will maintain adequate recreational and amenity space for all residents.

Question: What evidence supports the quantity, quality, and accessibility standards for green space in Dinas Powys?

How do these standards compare with national policy and the needs of the local population?

Green Infrastructure Network Integrity

The Plan does not explain how green infrastructure networks—including wildlife corridors, footpaths, cycleways, and recreational routes—will remain coherent and functional as new development comes forward.

There is a real risk that the proposed growth could fragment these networks, reducing connectivity for wildlife and limiting access to recreational spaces. I am concerned that the Plan does not set out measures to prevent these negative impacts.

• Question: How does the Plan ensure that green infrastructure networks in Dinas Powys, including wildlife corridors, footpaths, and recreational routes, remain coherent and functional despite new development?

Delivery and Implementation

The RLDP does not make it clear how green space provision will be delivered at the same time as development, rather than being left to later planning agreements or discretionary decisions.

Without clear delivery mechanisms, there is no certainty that new or replacement green space will be provided when needed.

This creates risk that residents will face reduced access to recreation, wildlife habitats, and open space for years after new homes are built.

• Question: What mechanisms are in place to ensure that green space provision in Dinas Powys will be delivered alongside development, rather than deferred to later discretionary planning stages?

Consideration in the Sustainability Appraisal

It is not evident that the Plan's Sustainability Appraisal has fully assessed the impact of proposed development on green space and green infrastructure in Dinas Powys.

There is no clear explanation of whether alternative development options were considered that would reduce the loss or fragmentation of green spaces, and if so, why these alternatives were rejected.

I am concerned that the lack of settlement-specific analysis weakens the credibility of the Plan and its ability to safeguard local environmental assets.

Question: Has the Integrated Sustainability Appraisal fully considered the impacts of proposed development on green space and green infrastructure in Dinas Powys?

Were alternatives considered that would reduce loss or fragmentation, and if so, why were they rejected?

5. Health & Wellbeing

Alignment with RLDP Policy SP6

The RLDP does not clearly demonstrate how proposed allocations and policies affecting Dinas Powys will achieve the health and well-being objectives set out in Policy SP6.

In particular, the Plan does not provide evidence that new development will:

- maintain or enhance access to green spaces,
- support active travel (walking, cycling, public transport), or
- deliver inclusive and safe public environments for all residents.

Without clear mechanisms to ensure these outcomes, it is unclear how the Plan will contribute to the creation of healthy, inclusive communities in line with its own strategic policy.

Question: How does the Plan ensure that proposed allocations and policies affecting Dinas Powys will deliver the health and well-being objectives set out in Policy SP6, including access to green space, active travel, and inclusive public environments?

Alignment with the Vale of Glamorgan Well-Being Plan

The RLDP does not clearly show how its proposals for Dinas Powys are consistent with the objectives of the Vale of Glamorgan Public Services Board Well-Being Plan, particularly in relation to:

- physical and mental health,
- health equity, and
- equitable access to green and recreational spaces.

There is no settlement-specific evidence demonstrating that new housing or other allocations will support these well-being objectives, leaving a gap in the Plan's justification and effectiveness.

Question: How does the RLDP demonstrate consistency with the Vale of Glamorgan Public Services Board Well-Being Plan, particularly the objectives relating to physical and mental health, health equity, and access to green spaces in Dinas Powys?

Evidence for Health and Well-Being Outcomes

The Plan does not provide sufficient evidence that its spatial strategy, site allocations, or policies will produce measurable improvements in health outcomes for residents of Dinas Powys, particularly in areas where health needs are identified.

Without this evidence, it is impossible to determine whether the proposed development will genuinely support improved physical or mental health, reduce health inequalities, or provide accessible, high-quality spaces for recreation and social interaction.

Question: What evidence demonstrates that the Plan's spatial strategy, allocations, and policies in Dinas Powys will produce measurable improvements in health outcomes for residents, especially in areas of identified need?

Integration with the Sustainability Appraisal

The RLDP's Integrated Sustainability Appraisal (ISA) does not clearly demonstrate how health and well-being impacts have been addressed specifically for Dinas Powys.

There is limited information on:

- mitigation or enhancement measures to support healthy communities,
- the contribution of proposed allocations to active travel networks, or

- ways in which new development will improve access to green infrastructure or inclusive public spaces.

Without settlement-specific consideration, the ISA does not provide sufficient assurance that health and well-being outcomes will be achieved, nor does it demonstrate compliance with national planning policy on creating healthy and sustainable places.

Question: How has the Integrated Sustainability Appraisal addressed health and well-being impacts specifically for Dinas Powys, and what mitigation or enhancement measures are proposed to ensure alignment with national planning policy on healthy places?

6. Education & Medical Services

I believe that the RLDP is unsound in relation to education and healthcare services in Dinas Powys

Education Provision

The RLDP does not provide clear, settlement-specific evidence regarding school capacity in Dinas Powys.

My key concerns include:

- There is no demonstration that local primary and secondary schools have enough places for the children who will arise from the proposed housing.
- It is unclear whether the Plan relies on borough-wide estimates, which may overlook local pressures and result in shortages at specific schools.
- The Plan does not identify any specific improvements to school infrastructure (such as new classrooms, extensions, or new schools), nor does it set out funding, timing, or delivery mechanisms.

Without these assurances, there is no certainty that school places will be available before families move in, which could lead to overcrowding and diminished educational standards.

I am concerned that, in the absence of firm evidence and infrastructure commitments, the proposed scale of housing growth in Dinas Powys may be unsustainable and undeliverable.

Healthcare / Medical Services

The RLDP does not demonstrate that local healthcare services—including GP practices, dental services, and community health facilities—can accommodate the increased population.

My specific concerns include:

- There is no settlement-specific assessment of current or future healthcare capacity in Dinas Powys.
- The Plan does not indicate whether additional or expanded healthcare facilities will be provided, nor how this would be funded, phased, or secured alongside new housing.
- Without clear planning, the proposed growth could reduce access to essential health services for both existing and new residents, impacting physical and mental health outcomes.

I am particularly concerned that increased demand without confirmed provision could lead to longer waiting times, reduced appointments, and pressure on local medical staff, undermining the well-being of the community.

These gaps mean the Plan is not effective, justified, or consistent with national planning policy, which requires growth to be planned where infrastructure is available or can be secured.

7. Affordable Housing Allocation

I support the principle of providing affordable homes for local residents, especially young families, first-time buyers, and key workers who cannot afford market rates.

Well-planned affordable housing can help maintain a mixed and vibrant community and retain younger residents.

Affordable homes in Dinas Powys could reduce commuting pressures by allowing residents to live and work locally.

However, the RLDP does not provide clear evidence for how many affordable homes are needed in Dinas Powys or what types of homes are required for different groups (families, older residents, low-income households).

There is insufficient information about how and when affordable homes will actually be delivered alongside market housing.

Without clear delivery plans or safeguards, affordable homes may not remain genuinely affordable in the long term.

Concentrated or poorly planned affordable housing may put pressure on local schools, healthcare, transport, and green spaces, which are already constrained in Dinas Powys.

The Plan does not explain how affordable housing will be integrated with market housing to create sustainable, mixed communities rather than segregation or social imbalance.

Because of the lack of clear evidence, delivery mechanisms, and mitigation for potential negative impacts, I do not consider the Plan sound in terms of affordable housing in Dinas Powys.

8. Community Cohesion & Social Integration

I am concerned that the Plan, as currently drafted, does not ensure new growth will support strong, healthy, and inclusive communities.

Until the Council provides clear evidence and enforceable measures addressing community cohesion, housing mix, and health impacts, I cannot have confidence that the Plan is sustainable or fair.

Impact on Community Cohesion and Social Integration

I am concerned that the Plan does not explain how new housing and growth will integrate with existing communities.

There is a risk that rapid development could strain local services, schools, and community spaces, and make it harder for neighbours to get to know one another.

I would like to see evidence that social infrastructure will keep pace with population growth and that communities will remain inclusive and connected.

Risk of Over-Concentration of Affordable Housing

I am concerned that clusters of affordable housing in certain areas could lead to pockets of social exclusion or limit access to opportunities.

The Plan does not explain how it will ensure a good mix of housing types and tenures across the Vale.
I ask that the Council provide evidence that housing allocations will support socially balanced, inclusive communities.

Impacts on Mental and Physical Wellbeing

I am concerned about increased traffic, air pollution, noise, and the loss of green spaces affecting health and wellbeing. The Plan does not provide clear commitments to protect or improve accessible green spaces or safe walking and cycling routes.

I would like to see evidence that the Plan has assessed the health impacts of growth and will take steps to mitigate them.

9. Climate Change & Sustainability

I am concerned that, as drafted, the Plan does not provide enough evidence or practical measures to ensure new development is sustainable and climate resilient. The RLDP is not fully justified, effective, or consistent with national policy on climate change and sustainability.

Key gaps include alignment with carbon reduction targets, enforceable delivery of low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure.

Without clear policies and enforceable commitments on low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure, the Plan risks harming both the environment and the wellbeing of communities.

Alignment with Welsh Government's Carbon Reduction Targets

I am concerned that the Plan does not explain clearly how new homes, workplaces, and other development will help Wales meet its legally binding carbon reduction targets.

Without this, there is a risk that growth in the Vale could increase emissions rather than reduce them. I would like to see evidence showing how this (and each) new development contributes to lowering carbon emissions.

Promotion of Low-Carbon Travel, Energy-Efficient Homes, and Sustainable Drainage

I am worried that the Plan relies too much on people walking, cycling, or using public transport without clear plans to make this happen.

There is also little information on whether new homes will be energy-efficient or if systems to manage rainfall and reduce flooding (like sustainable drainage) will be properly installed and maintained.

I want to see clear, practical measures to make low-carbon travel, energy-efficient homes, and safe drainage a reality.

Resilience of Infrastructure to Extreme Weather Events

I am very concerned about the impacts of extreme weather, including flooding, heatwaves, and storms, on roads, utilities, and homes.

The Plan does not clearly show how new developments or existing infrastructure will be designed to cope with these risks.

I would like to have assurance that any buildings, roads, drainage, and community facilities will be climate-resilient and protect people's health and safety.

10. Plan-making Process & Evidence Base

In my view, the RLDP is not fully justified or effective in its current form with respect to plan-making and the evidence base. Key gaps include accessibility and transparency of evidence, consideration of resident and stakeholder feedback, and robust monitoring and review arrangements.

Without clear and accessible evidence, demonstrated consideration of local feedback, and robust monitoring and review mechanisms, residents cannot be confident that the Plan will be fair, effective, or responsive to changing circumstances.

Clarity, Transparency, and Accessibility of Evidence

The RLDP is not always clear and is not easy to access.

Technical reports, data, and assumptions are often difficult to find or understand, making it hard for residents to see why particular sites or policies were chosen.

The Council should provide accessible summaries and clear explanations so that everyone can understand and comment on the evidence.

Local Consultation and Consideration of Resident Feedback

I am concerned that residents' views may not have been fully taken into account in shaping the Plan.

It is unclear how consultation responses have influenced allocation decisions or policy wording.

I seek assurance that feedback from local people and community groups has genuinely informed the Plan, and that future consultations will be inclusive and clearly reported.

Monitoring and Review Mechanisms

The Plan does not clearly explain how progress will be monitored or how changes will be made if things do not go as planned. For example, if housing delivery is slower than expected or infrastructure is delayed, there is little information on how allocations or policies would be adjusted.

Attachments:

Representation Form - Redacted - <https://valeofglamorgan.oc2.uk/a/twp>

Representation Form Annex - Redacted - <https://valeofglamorgan.oc2.uk/a/twq>

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Comment

Document Element: Deposit Plan Documents, Deposit Plan - Appendices

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:**Delivery and Implementation**

PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.

The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.

The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.

Without prejudice to the Minister's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.

National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.

After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:

Annex 1 – General Conformity with Future Wales

- No significant concerns

Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)

- Spatial Strategy and Primary Settlements
- Housing and Economic Growth Levels – Regional Collaboration
- Maximising Affordable Housing Provision
- Delivery & Implementation – General
- Gypsy and Travellers
- Renewable Energy
- Minerals
- Best and Most Versatile Agricultural Land (BMV)
- Welsh Language

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

My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely,

Neil Hemington

Chief Planner Welsh Government

Annex 1 - Statement of General Conformity

The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in

paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).

There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.

Reasons

Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.

Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).

BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.

The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.

On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):

Policy 1: Where will Wales grow

Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking

Policy 6: Town Centre First

Policy 10: International Connectivity – Cardiff Airport

Policy 12 Regional Connectivity

Policy 33: National Growth Area – Cardiff, Newport and the Valleys

Policy 36: South-East Metro

Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)

Spatial Strategy - Location of Growth

The Council tested 4 spatial options:

Option 1 – Continuation of the adopted LDP growth strategy

Option 2 – Dispersed Growth

Option 3 – Focused Growth

Option 4 – Sustainable Transport Orientated Growth

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

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

Spatial Strategy - Primary Settlements

The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.

The Level of Growth - Homes and Jobs

The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14). Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

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

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

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

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

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

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

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

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

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

Affordable Housing Provision

The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of

65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).

Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.

The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan. Affordable Housing Led Sites

To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.

Paragraph 6.137 of the plan states:

"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."

The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.

These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?

Affordable Housing Exceptions Sites

Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.

Employment Land

The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).

Delivery and Implementation

PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.

The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.

The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.

The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters. It will be for the Council to justify deliverability supported by robust financial viability.

Gypsy and Travellers

The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

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

outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.

Renewable Energy

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

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

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

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

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

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

Minerals

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

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

BMV Agricultural Land

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

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

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

Green Infrastructure

Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.

PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure

should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.

Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.

Welsh Language

There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:

"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."

There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Attachments:

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