

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

Volume 8 - Full Representations on the Integrated Sustainability Appraisal and Habitats Regulations Assessment

August 2026



Introduction to Representations Register

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

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 It also excludes representations that have been withdrawn.

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

Volume 1 provides a summary of all representations.

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

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

The Volumes are as follows:

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

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

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

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

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

Document Element: Consultation Documents, Integrated Sustainability Appraisal of the Deposit Plan

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

2. Integrated Sustainability Assessment (ISA)

With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to mitigate the potential adverse effects, through design stipulations and policy inclusions. The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in order to help establish appropriate protection and/or enhancement measures.

We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of Pencoedre Lane. Please refer to our site-specific comments in Section 4 below.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.

We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.

1. Summary

We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking

the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We

appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.

However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.

General Approach to Designated Sites

In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.

We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.

By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.

We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be

helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites

within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.

With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.

Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the

Green Infrastructure Strategy (GIS) which incorporates the GIA.

It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing

the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.

Master Planning

We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.

Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration at the project/planning application level and in master planning.

Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.

Strategic Opportunity at Bro Tathan

In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already

made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.

This will ensure that development in the area:

- does not cause detriment to the maintenance of the favourable conservation status of protected species;
- results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.

Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.

Areas of High Ecological Value

As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.

2. Integrated Sustainability Assessment (ISA)

With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to

mitigate the potential adverse effects, through design stipulations and policy inclusions.

The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in

order to help establish appropriate protection and/or enhancement measures.

We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording

Strategic Policies

Strategic Policy SP19 – Green Infrastructure

We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger “policy hook” within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.

This could be resolved by a new criterion such as:

“the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment (and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale.”

To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:

“Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value”.

We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered. We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.

This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.

Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.

Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience

We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term “high ecological value” in our Summary section at the start of this letter.

We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan’s alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.

By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53). We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful

for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its

current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.

Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting

the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.

With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.

As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure

Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7

We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological connectivity.

Policy DPN8

Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites

We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:

“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas

We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of

the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas

This policy identifies several sites where the potential for wind and solar development are the greatest (known as 'search areas'). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.

This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan

We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites

Overview

We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure

Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:

- It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
- To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;

We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity

A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones

Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments

KS1 – Land at North West Barry

Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained and/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage. **Protected Sites** – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1 under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for

Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road

Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way

Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential

that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm

Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan

Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations

Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane

Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.

HG1 (2) Land at the Mole

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

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

Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that

Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.

Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road

Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites

HG4 (1) Land to the East of Colwinston

Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations

SP14 (1) Land east of Cardiff Airport, Rhoose

Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park

Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a greater scale to better inform allocation.

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol

Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.

Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations

SP14 (5) Atlantic Trading Estate, Barry

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)

Marine and Coastal Physical Processes

Coastal Squeeze

We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on greenfield sites adjoining the estuary".

We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to undertake works to coastal structures.

Loss of Functionally Linked Habitat

As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.

Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore agree with this conclusion.

In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan.

Policy DNP8

We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)

Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.

We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure

Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.

We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by

Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.

We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been

deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)

We have reviewed the submitted SFCA and agree with the scope of the assessment made.

We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys. Any updated SFCA should have regard to NFM schemes being progressed in their area and

proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)

We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Attachments:

Email representation redacted - <https://valeofglamorgan.oc2.uk/a/3pq>

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Object

Document Element: Consultation Documents, Integrated Sustainability Appraisal of the Deposit Plan

Respondent: Taylor Wimpey [386]

Agent: Savills

Summary:

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

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

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

Full text:**1. Introduction**

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

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

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

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

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

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

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

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

2. Candidate Site Assessment Process and Integrated Sustainability Assessment

Introduction

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

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

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

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

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

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

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

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

2.1.8 The key conclusions from this Assessment are that:

- The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;
- The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;
- The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;
- The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and
- Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit’s equivalent work would be lost.

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

Integrated Sustainability Appraisal

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

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

2.1.12 A summary of this is presented below:

Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

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

3. Deposit Plan

3.1 Introduction

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

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

Table 2 Taylor Wimpey Policy Position

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

3.2 Key Themes and Strategic Objectives

Homes For All

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

Placemaking

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

Protecting and Enhancing the Natural Environment

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

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

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

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

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

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

Options in Barry'

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

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

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

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

Figure 1 Extract of Growth Strategy

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

Policy SP2 Settlement Hierarchy

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

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

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

Policy SP 6 Housing Requirement

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

Housing Requirement

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

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the

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

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

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

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

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

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

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

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

Flexibility Allowance

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

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

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

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

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

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

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

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved

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

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

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

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

Windfall Allowances

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

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

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

Rolled Forward Sites

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

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

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

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

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

Conclusion

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

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach

Housing Supply - Deposit Plan (December 2025) - Taylor Wimpey Suggested Approach (March 2026)

Housing Requirement - 7,890 - 9,623

Flexibility Allowance - 10% - 20%

Flexibility Allowance – 770 - 1,925

Housing Requirement + Flexibility Allowance - 8,660 - 11,548
 A – Completions - 1,747 - 1,747
 B – Units Under Construction - 313 - 313
 C and D- Units with Planning Permission Minus Non-Delivery Allowance - 1,777 1,488
 Existing Supply - 3,827 - 3,548
 E – Large Windfall Sites - 720 - 540
 F – Small Windfall Sites - 583 - 438
 E+ F Total Windfall Allowance - 1,303 - 978
 RLDP Allocations - 3,520 - 3,150

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

Policy HG1 KS1 – Land at North West Barry

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

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

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

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

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

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.

3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.

3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

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

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

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

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

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

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

Accessibility and Sustainability

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

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

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

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

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

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

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

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

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

Conclusion

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

Policy TR1 Transport Proposals

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

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

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access

to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

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

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

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

Policy CC1 (Residential Operational Net Zero Carbon Development)

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

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

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

3.15 There are two points to be made here:

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

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

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

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

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

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

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

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

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

Policy CI1 (Open Space Provision)

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

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

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

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

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

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

Attachments:

Redacted Deposit Representation Form - <https://valeofglamorgan.oc2.uk/a/3c8>

Redacted Candidate Site Rep Form - <https://valeofglamorgan.oc2.uk/a/3c9>

Redacted Candidate Site Rep Form 2 - <https://valeofglamorgan.oc2.uk/a/3cv>

Redacted ISA HRA Representation Form - <https://valeofglamorgan.oc2.uk/a/3cb>

Redacted Supporting Evidence - <https://valeofglamorgan.oc2.uk/a/3g5>

Document Element: Consultation Documents, Habitats Regulations Assessment

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

6. Habitats Regulations Assessment (HRA)

Marine and Coastal Physical Processes Coastal Squeeze

We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on greenfield sites adjoining the estuary".

We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to undertake works to coastal structures.

Loss of Functionally Linked Habitat

As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.

Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore agree with this conclusion.

In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached.

The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan. Policy DNP8

We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such.

We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)

Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.

We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure

Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached.

Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.

We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.

We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.

We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.

1. Summary

We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking

the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We

appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.

However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.

General Approach to Designated Sites

In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.

We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.

By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.

We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be

helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites

within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.

With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.

Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the

Green Infrastructure Strategy (GIS) which incorporates the GIA.

It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.

Master Planning

We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.

Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration at the project/planning application level and in master planning.

Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.

Strategic Opportunity at Bro Tathan

In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already

made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.

This will ensure that development in the area:

- does not cause detriment to the maintenance of the favourable conservation status of protected species;
- results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.

Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.

Areas of High Ecological Value

As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.

2. Integrated Sustainability Assessment (ISA)

With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to

mitigate the potential adverse effects, through design stipulations and policy inclusions.

The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in

order to help establish appropriate protection and/or enhancement measures.

We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording

Strategic Policies

Strategic Policy SP19 – Green Infrastructure

We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.

This could be resolved by a new criterion such as:

"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment (and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."

To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:

"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".

We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.

We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.

This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.

Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.

Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience

We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.

We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.

By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53). We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful.

for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.

Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.

With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.

As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure

Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7

We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological connectivity.

Policy DPN8

Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites

We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:

"There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value".

EMP1 – Employment Regeneration Opportunity Areas

We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas

This policy identifies several sites where the potential for wind and solar development are the greatest (known as 'search areas'). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.

This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan

We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites Overview

We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure

Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:

- It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
 - To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
- We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity

A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones

Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments

KS1 – Land at North West Barry

Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage. Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1 under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road

Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way

Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm

Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan

Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations

Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane

Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.

HG1 (2) Land at the Mole

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

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

Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that

Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.

Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road

Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites

HG4 (1) Land to the East of Colwinston

Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations

SP14 (1) Land east of Cardiff Airport, Rhoose

Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park

Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a greater scale to better inform allocation.

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning

application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol

Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.

Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations

SP14 (5) Atlantic Trading Estate, Barry

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)

Marine and Coastal Physical Processes

Coastal Squeeze

We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on greenfield sites adjoining the estuary".

We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to undertake works to coastal structures.

Loss of Functionally Linked Habitat

As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.

Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore agree with this conclusion.

In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan.

Policy DNP8

We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)

Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome. We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure

Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.

We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by

Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.

We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been

deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)

We have reviewed the submitted SFCA and agree with the scope of the assessment made.

We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys. Any updated SFCA should have regard to NFM schemes being progressed in their area and

proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)

We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Attachments:

Email representation redacted - <https://valeofglamorgan.oc2.uk/a/3pq>