VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

Volume 9 - Full Representations on Candidate Sites

August 2026

RLDP CDLN

VALE of GLAMORGAN BRO MORGANNWG

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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 It also excludes representations that have been withdrawn.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.

4787 Comment

Document Element: BARRY / Y BARRI, 371 Walters Farm / Fferm Walter

Respondent: Mrs Joanna Phillips [2949]

Summary:

The traffic in this area is already extremely congested . Without substantial improvements to public transport, building more residential properties would make existing congestion even worse.

Full text:

The traffic in this area is already extremely congested . Without substantial improvements to public transport, building more residential properties would make existing congestion even worse.

Attachments: None

4919 Object

Document Element: BARRY / Y BARRI, 371 Walters Farm / Fferm Walter

Respondent: Mrs Carolyn Stillman [2546]

Summary:

This proposal is in an area where Is already significant traffic disruption and backlog.

There is a significant environmental impact in the building, and were waste will be taken not to mention the destruction of the natural beauty and habitat for the wildlife local wildlife

Full text:

This proposal is in an area where Is already significant traffic disruption and backlog.

There is a significant environmental impact in the building, and were waste will be taken not to mention the destruction of the natural beauty and habitat for the wildlife local wildlife

Attachments: None

5288 Object

Document Element: BARRY / Y BARRI, 371 Walters Farm / Fferm Walter

Respondent: Mrs Linda Donovan [3211]

Summary:

I oppose all developments around Weycock Cross and Highlight Park, as they harm local wildlife and green spaces and would significantly increase traffic on Port Road. I believe enlarging lanes at Weycock Cross roundabout will not effectively reduce congestion. Additionally, there is no information on how the growing population will access healthcare or education, and public transport in the area is minimal. Overall, I see these developments as detrimental to the environment and community infrastructure.

Full text:

Don’t agree with any of the developments - candidate or otherwise around weycock cross or highlight park. All of them have a negative impact on the natural habitat in respective areas affecting all types of wildlife (airborne snd ground) and grasses/green areas. All of them would have a significant impact on traffic accessing port road. The mitigation of increasing the size of lanes at weycock cross roundabout will not have any significant impact on the traffic at the roundabout and surrounding roads. There is no indication of how the increased numbers in the area would access healthcare or educational establishments. There are negligible public transport services already serving the area.

Attachments: None

5858 Object

Document Element: BARRY / Y BARRI, 371 Walters Farm / Fferm Walter

Respondent: Mrs Catherine Fraser [3401]

Summary:

The development is destroying the green wedge. The site will have a massive detrimental impact on the community through increased strain on limited local drs, dentist and schools. Poor public transport links else where in the vale is not a reason to over populate barry. Weycock cross is a pinch point for traffic through the vale. The junction is already at capacity. Future commercial developments in the vale will not be viable as the road network is not fit for purpose. This will damage the natural wild meadows and habitat of the old farm.

Full text:

The development is destroying the green wedge. The site will have a massive detrimental impact on the community through increased strain on limited local drs, dentist and schools. Poor public transport links else where in the vale is not a reason to over populate barry. Weycock cross is a pinch point for traffic through the vale. The junction is already at capacity. Future commercial developments in the vale will not be viable as the road network is not fit for purpose. This will damage the natural wild meadows and habitat of the old farm.

Attachments: None

5861 Object

Document Element: BARRY / Y BARRI, 371 Walters Farm / Fferm Walter

Respondent: Mr Luke Fraser [3313]

Summary:

Road network surrounding is not suitable and suggested changes to weycock Cross arent physically achievable with the space. The site is surrounded by wild meadows and woodland habitats which will be destroyed. Local services and already at capacity. The green wedge will slowly be eroded and the vales identity and community will be lost.

Full text:

Road network surrounding is not suitable and suggested changes to weycock Cross arent physically achievable with the space. The site is surrounded by wild meadows and woodland habitats which will be destroyed. Local services and already at capacity. The green wedge will slowly be eroded and the vales identity and community will be lost.

Attachments: None

5289 Object

Document Element: BARRY / Y BARRI, 407 Land West of Coed Mawr Road / Tir i'r gorllewin o Coed Mawr Road

Respondent: Mrs Linda Donovan [3211]

Summary:

I oppose all developments around Weycock Cross and Highlight Park, as they harm local wildlife and green spaces and would significantly increase traffic on Port Road. I believe enlarging lanes at Weycock Cross roundabout will not effectively reduce congestion. Additionally, there is no information on how the growing population will access healthcare or education, and public transport in the area is minimal. Overall, I see these developments as detrimental to the environment and community infrastructure.

Full text:

I oppose all developments around Weycock Cross and Highlight Park, as they harm local wildlife and green spaces and would significantly increase traffic on Port Road. I believe enlarging lanes at Weycock Cross roundabout will not effectively reduce congestion. Additionally, there is no information on how the growing population will access healthcare or education, and public transport in the area is minimal. Overall, I see these developments as detrimental to the environment and community infrastructure.

Attachments: None

4501 Object

Document Element: BARRY / Y BARRI, 420 Land off Port Road, Barry / Tir oddi ar Port Road, y Barri

Respondent: Mrs Pam Spence [2822]

Summary:

The Port Road area is already congested and polluted by too much traffic.

Full text:

The Port Road area is already congested and polluted by too much traffic.

Attachments: None

4790 Comment

Document Element: BARRY / Y BARRI, 420 Land off Port Road, Barry / Tir oddi ar Port Road, y Barri

Respondent: Mrs Joanna Phillips [2949]

Summary:

The traffic in this area is already extremely congested . Without substantial improvements to public transport and community facilities, building more residential properties would make existing congestion even worse as home owners will be reliant on cars for schools, drs, shopping etc.

Full text:

The traffic in this area is already extremely congested . Without substantial improvements to public transport and community facilities, building more residential properties would make existing congestion even worse as home owners will be reliant on cars for schools, drs, shopping etc.

Attachments: None

4918 Object

Document Element: BARRY / Y BARRI, 420 Land off Port Road, Barry / Tir oddi ar Port Road, y Barri

Respondent: Mrs Carolyn Stillman [2546]

Summary:

There is already significant congestion at the roundabout with an infrastructure that cannot cope.
Building on this land will cause significant traffic congestion not to mention environmental concerns, especially The removal of areas of natural beauty were many different species feed and live

Full text:

There is already significant congestion at the roundabout with an infrastructure that cannot cope.
Building on this land will cause significant traffic congestion not to mention environmental concerns, especially The removal of areas of natural beauty were many different species feed and live

Attachments: None

5157 Object

Document Element: BARRY / Y BARRI, 420 Land off Port Road, Barry / Tir oddi ar Port Road, y Barri

Respondent: Mr David Taylor [2567]

Summary:

I formally oppose the development based on the following critical infrastructure and environmental failures:
Traffic & Safety: Port road already at peak capacity; additional housing risks total gridlock and delayed emergency response times.
Education: According to School Capacity Report, Barry schools are already oversubscribed.
Healthcare: NHS Wales data confirms Barry has the region's longest GP wait times.
Infrastructure Deficit: Over 1,000 homes recently built in Rhoose/St Athan have received zero commensurate upgrades to roads or services.
Environment: Development violates "Green Wedge" status and the Wales Biodiversity Partnership, threatening local farming and wildlife.
Drainage: Topography creates high flood risks.

Full text:

I formally oppose the development based on the following critical infrastructure and environmental failures:
Traffic & Safety: Port road already at peak capacity; additional housing risks total gridlock and delayed emergency response times.
Education: According to School Capacity Report, Barry schools are already oversubscribed.
Healthcare: NHS Wales data confirms Barry has the region's longest GP wait times.
Infrastructure Deficit: Over 1,000 homes recently built in Rhoose/St Athan have received zero commensurate upgrades to roads or services.
Environment: Development violates "Green Wedge" status and the Wales Biodiversity Partnership, threatening local farming and wildlife.
Drainage: Topography creates high flood risks.

Attachments: None

4502 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 361 Land at Port Road, Rhoose / Tir yn Port Road, Y Rhws

Respondent: Mrs Pam Spence [2822]

Summary:

Traffic is at a standstill at peak times and more building and commuters will add to pollution, loss of green space for wellbeing and wildlife and congestion.

Full text:

Traffic is at a standstill at peak times and more building and commuters will add to pollution, loss of green space for wellbeing and wildlife and congestion.

Attachments: None

5158 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 361 Land at Port Road, Rhoose / Tir yn Port Road, Y Rhws

Respondent: Mr David Taylor [2567]

Summary:

I formally oppose the development based on the following critical infrastructure and environmental failures:
Traffic & Safety: Port road is already at peak capacity; additional housing risks total gridlock and delayed emergency response times.
Education: According to the 2023 School Capacity Report, Barry/rhoose schools are already oversubscribed.
Healthcare: 2023 NHS Wales data confirms Barry/Rhoose has the region's longest GP wait times.
Infrastructure Deficit: Over 1,000 homes recently built in Rhoose/St Athan have received zero commensurate upgrades to roads or services.
Environment: Development violates "Green Wedge" status and the Wales Biodiversity Partnership, threatening local farming and wildlife.

Full text:

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Education: According to the 2023 School Capacity Report, Barry/rhoose schools are already oversubscribed.
Healthcare: 2023 NHS Wales data confirms Barry/Rhoose has the region's longest GP wait times.
Infrastructure Deficit: Over 1,000 homes recently built in Rhoose/St Athan have received zero commensurate upgrades to roads or services.
Environment: Development violates "Green Wedge" status and the Wales Biodiversity Partnership, threatening local farming and wildlife.

Attachments: None

5481 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 361 Land at Port Road, Rhoose / Tir yn Port Road, Y Rhws

Respondent: Mrs Deborah Selley [652]

Summary:

No more houses unless you improve the infrastructure. The roads can't cope with more traffic, there aren't sufficient GP Surgeries or schools and proper affordable sustainable transport is non existent.

Full text:

No more houses unless you improve the infrastructure. The roads can't cope with more traffic, there aren't sufficient GP Surgeries or schools and proper affordable sustainable transport is non existent.

Attachments: None

4403 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 364 Parc Hoddnant / Parc Hoddnant

Respondent: Mr Simon Jennings [2755]

Summary:

Access not suitable for the increase of traffic. Regarding safety of the 3 schools on Ham Lane East and on Hoddnant estate.
If a bridge was constructed for access over the brook, then it would damage to riverbank, tree roots and increase risk of flooding.
Invasion of privacy to the properties backing on to Hoddnant Brook.
At its last review it was deemed as Agricultural Land and due to the presence of protected species, as supported by ecological surveys, development of the site would significantly impact on the protected species and as conclusion would not be suitable for further consideration.

Full text:

Access not suitable for the increase of traffic. Regarding safety of the 3 schools on Ham Lane East and on Hoddnant estate.
If a bridge was constructed for access over the brook, then it would damage to riverbank, tree roots and increase risk of flooding.
Invasion of privacy to the properties backing on to Hoddnant Brook.
At its last review it was deemed as Agricultural Land and due to the presence of protected species, as supported by ecological surveys, development of the site would significantly impact on the protected species and as conclusion would not be suitable for further consideration.

Attachments: None

5183 Comment

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 377 Land adjoining Heritage Business Park /Tir yn ffinio â'r Parc Busnes Treftadaeth

Respondent: Llantwit Major Town Council (Clerk) [230]

Summary:

The case for additional burial land within Llantwit Major Town Council (LMTC) area has been established for some time. The current provision is inadequate and there is a risk that burial and memorial space will run out. Background Paper 38 (Cemeteries and Crematoria) November 2025 establishes the case for additional land and LMTC strongly takes the view that additional land is urgently required. LMTC is therefore very supportive of placing this site within the Replacement LDP and wishes its views to be taken into account. The land identified is easily accessible and would be ideal for this purpose.

Full text:

The case for additional burial land within Llantwit Major Town Council (LMTC) area has been established for some time. The current provision is inadequate and there is a risk that burial and memorial space will run out. Background Paper 38 (Cemeteries and Crematoria) November 2025 establishes the case for additional land and LMTC strongly takes the view that additional land is urgently required. LMTC is therefore very supportive of placing this site within the Replacement LDP and wishes its views to be taken into account. The land identified is easily accessible and would be ideal for this purpose.

Attachments: None

4412 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 395 Glebelands at Llanmaes / Glebelands yn Llan-faes

Respondent: Mr matthew white [2758]

Summary:

this must not be allowed to go ahead for the following reasons:
- green belt between 2 settlements
- Llanmaes historic village needs to be protected from development, (already a conservation area)
- defamation of country side green field site with brown field sites near by (llandow, raf st athan)
- part of this land is a flood plain
- increased traffic roads cant handle amount already
- not enough services nearby to support more people (doctors, pharmacy, bus, rail)
- disruption to residents lifestyle, many people use the roads to ride horses including children riders, many cyclists use this route increased cars increased dangers

Full text:

this must not be allowed to go ahead for the following reasons: green belt between 2 settlements Llanmaes historic village needs to be protected from development, (already a conservation area) defamation of country side green field site with brown field sites near by (llandow, raf st athan) part of this land is a flood plain increased traffic roads cant handle amount already not enough services nearby to support more people (doctors, pharmacy, bus, rail) disruption to residents lifestyle, many people use the roads to ride horses including children riders, many cyclists use this route increased cars increased dangers

Attachments: None

4891 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 395 Glebelands at Llanmaes / Glebelands yn Llan-faes

Respondent: Mrs Linda Green [1072]

Summary:

I had believed this submission previously rejected as it does not meet the criteria for development within the Vale due to size. However, to reiterate, I object to the development of this field.

Full text:

I had believed this submission previously rejected as it does not meet the criteria for development within the Vale due to size
However, to reiterate, I object to the development of this field.

Attachments: None

6129 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 395 Glebelands at Llanmaes / Glebelands yn Llan-faes

Respondent: Ms Ann Barnaby [1702]

Summary:

Totally agree with the Vale Planners assessment this is not a suitable site for additional housing for many planning reasons

Full text:

Totally agree with the Vale Planners assessment this is not a suitable site for additional housing for many planning reasons

Attachments: None

4433 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 399 Land at St Athan / Tir yn Sain Tathan

Respondent: Mr Sam Rowlands [2772]

Summary:

More building in st Athan the amount of green space we lost with the barrets site and now you will take the only little bit we have left not just that st Athan needs mega improvement links train stations reliable bus services better roads to Barry more schools and better gp services! seeing all this just makes me want to sell up and leave the area I did not buy my home in this area 10 years ago for all this

Full text:

More building in st Athan the amount of green space we lost with the barrets site and now you will take the only little bit we have left not just that st Athan needs mega improvement links train stations reliable bus services better roads to Barry more schools and better gp services! seeing all this just makes me want to sell up and leave the area I did not buy my home in this area 10 years ago for all this

Attachments: None

4987 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 399 Land at St Athan / Tir yn Sain Tathan

Respondent: Mr Chris Twine [3056]

Summary:

St Athan village doesn't allow HGV access for good reason. Additionally we already had an extremely poorly designed road junction by the war memorial.

Full text:

St Athan village doesn't allow HGV access for good reason. Additionally we already had an extremely poorly designed road junction by the war memorial

Attachments: None

7119 Support

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 410 The Quarries and adjoining Land / Y Chwareli a'r Tir cyfagos

Respondent: Seth Hill & Son Ltd [1197]

Agent: Highlight Planning

Summary:

Objection is taken to the candidate site assessment insofar as it relies on the statement that no further allocations are specifically required under RTS2 as the reason for not taking the site forward positively. That reasoning is too narrow because it fails to engage with the fact that the site is an existing quarrying location, that the candidate submission sought retention of quarry status as well as longer-term safeguarding, and that the site has benefited from ROMP approval ref. 2024/00246/ENV, which permits operations until 21 February 2042. The consented quarry element should continue to be positively recognised in the Plan, reflecting its existing planning status, updated ROMP conditions and ongoing minerals planning context.

Continued extraction would make productive use of an existing quarry site, avoid sterilisation of unworked reserves, provide continuity and resilience of mineral supply, support local economic benefits and allow restoration-led environmental gains through planting, habitat creation and long-term after-use.

The current treatment of Pant-y-Ffynnon Quarry does not fully reflect the evidence before the Council on the site's planning status, deliverability and continuing operational role.

The Plan does not go far enough in applying national minerals policy when considering the ongoing role of Pant-y-Ffynnon Quarry.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF SETH HILL AND SON LTD

1. Introduction

These representations are submitted on behalf of Seth Hill & Son Ltd in response to the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036.

They relate specifically to the treatment of Pant-y-Ffynnon Quarry / Seth Hill Quarry, Bonvilston in the Deposit Plan and the associated candidate site assessment process.

The principal concern arises from the Council's candidate site assessment, which states that a positive allocation for mineral working is not included because "The 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within

the Vale of Glamorgan RLDP."
That explanation addresses only the narrow issue of whether a fresh minerals allocation is presently required on RTS2 arithmetic. It does not adequately address the planning merits of Pant-y-Ffynnon Quarry itself, nor does it justify a limited or negative treatment of the site in the Deposit RLDP.
These representations therefore object to the overly narrow basis on which the site appears to have been discounted for positive recognition and seek a more balanced and evidence-based treatment of Pant-y-Ffynnon Quarry within the Plan.
2. Site context
Pant-y-Ffynnon Quarry is an established quarrying location with an existing mineral planning history and an established role within the local minerals framework.
The candidate site planning statement explains that the site comprises the full extent of the currently consented Ffynnon Quarry, together with adjoining land to the south. It confirms that the quarry extracts limestone and that the consented quarry element is identified in the adopted LDP as a Quarry Site, with adjoining land within the Buffer Zone and wider Mineral Safeguarding Area. The submission sought to retain the existing LDP status of the consented element and to safeguard the potential for further quarrying to take place on the remainder of the site in the longer term.
The candidate site statement also recorded the continuing active planning context at the site, including application ref. 2021/01379/FUL for the resumption of limestone extraction in the North Quarry, the establishment of an aggregates recycling facility, and restoration of the North Quarry using inert waste materials. That position has since been materially reinforced by the ROMP determination.
Decision notice 2024/00246/ENV is a Determination of New Working Conditions for Pantyffynnon Quarry / Seth Hill Quarry, Bonvilston. The decision provides that the new conditions replace those attached to permissions 97/01084/FUL and 2009/00184/ENV. Condition 1 states that "No operations authorised by this permission, with the exception of restoration and after-treatment works approved under these conditions shall take place after 21 February 2042." The decision also requires a detailed working scheme, revised working programmes every five years, and imposes an annual production limit of 250,000 tonnes.
BP25 independently corroborates the continuing active status of the quarry. It identifies Pantyffynnon in Table 1 as an active quarry with an extraction end date of 21.02.2042. BP25 also confirms that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use".
Taken together, that evidence confirms that the site is not simply a historic quarry with uncertain prospects. It is an active quarry with a recently updated modern conditions framework and an extraction end date beyond the RLDP period.
3. Objection to the candidate site assessment
The Council's candidate site assessment relies on the proposition that no further allocations are specifically required because of the RTS2 position. That reasoning is too narrow.
The statement that no further allocations are specifically required may explain why the Council has concluded that it does not presently need to identify a fresh minerals allocation in order to meet the current quantitative apportionment. It does not, however, address the separate issue of how the Plan should treat an existing quarry site such as Pant-y-Ffynnon Quarry.
The absence of a current need for a new allocation is not the same as a conclusion that an established quarry site should cease to be positively recognised, should no longer be meaningfully safeguarded, or should be treated as strategically unimportant.
The candidate site submission itself demonstrates why the Council's reasoning is incomplete. The submission did not merely seek a fresh allocation on the basis of additional tonnage need. It sought retention of the existing quarry status of the consented element and safeguarding of the wider site for longer-term quarrying potential.
The ROMP decision strengthens that point considerably. A site that has recently been granted updated mineral working conditions and is authorised to continue operations until 21 February 2042 cannot sensibly be treated as though its future role is immaterial simply because current RTS2 figures do not require a further allocation elsewhere in the Vale.
The Council's approach is also difficult to reconcile with national plan-making guidance. The Development Plans Manual states that plans should be based on "robust evidence" so they can be delivered, that candidate sites should not be purposefully excluded from assessment, and that the key objective is whether a promoter has a serious intention to bring the site forward, which links directly to the soundness question "Will the plan deliver?"
In those circumstances, the candidate site assessment appears to conflate two distinct questions: whether a new specific allocation is numerically required under RTS2, and whether an established quarry site should continue to be positively recognised and safeguarded in the Plan. Those questions are not the same. The former may currently be answered in the negative. The latter, in the case of Pant-y-Ffynnon Quarry, should plainly be answered in the affirmative.
4. National and local policy context
The wider policy and evidence framework supports a more positive treatment of Pant-y-Ffynnon Quarry than is reflected in the candidate site assessment.
PPW states that it is in the interests of the minerals industry that landbanks reflect "real possibilities for future mineral working" and adds that authorities should provide "a clear guide to where nonenergy mineral extraction is likely to be acceptable".
MTAN1 explains that development plans should identify "dormant reserves" separately and states that

"A more realistic landbank assessment is the aim of this process" so that a more accurate picture emerges of reserves "that are likely to have real potential for future working". It also states that the future landbank should include land specifically allocated for the working of aggregates as an "extended landbank".

The SWRAWP RTS reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply. SWRAWP also confirms that dormant reserves "must be counted separately".

The Deposit RLDP's own framework is consistent with that broader policy approach. The Plan safeguards known limestone resources and retains quarry buffer zones so that incompatible development does not prejudice mineral operations or future working. BP25 explains that the RLDP safeguards finite mineral resources for future generations and protects them from permanent development that could sterilise or hinder extraction.

The Plan also provides a detailed framework for sustainable mineral working, including new workings, extensions and the reworking or reopening of old workings. That mechanism is intended to deal with the detailed merits of mineral proposals, including environmental effects, amenity, hydrology, transport and restoration. There is therefore no sound policy basis for adopting an unduly negative position toward Pant-y-Ffynnon Quarry at plan-making stage simply because no fresh allocation is currently required.

5. Benefits of continued extraction at Pant-y-Ffynnon Quarry

Continued extraction at Pant-y-Ffynnon Quarry would give rise to a number of important site-specific and strategic benefits.

PPW expressly recognises the planning advantages of extending established quarry sites. Paragraph 5.14.48 states that "The presence of an existing quarry should be a material consideration when considering a proposal for an extension. There may be benefits to extending a site in terms of shared infrastructure, for instance, as opposed to working a new greenfield site." That principle is directly relevant to Pant-y-Ffynnon Quarry. The site is an existing quarrying location with an established operational and planning context, and any continued working or extension would be able to build upon that existing quarrying footprint, associated infrastructure and minerals land use relationship. In planning terms, that is materially preferable to directing future working to an entirely new greenfield location, and it reinforces the case for the Deposit RLDP to continue to recognise the site positively within the minerals strategy rather than treating it as strategically unimportant simply because no fresh allocation is currently required.

The site is an existing quarrying location with an established mineral planning history. Continued extraction would therefore amount to the continuation and proper management of an existing quarrying use rather than the introduction of mineral development into a wholly new location. That is a material land use consideration.

The candidate site statement identifies the effective use of mineral resources and the avoidance of sterilisation of unworked reserves as clear benefits of the proposal. That carries substantial weight. Mineral resources can only be worked where they occur, and it is generally more efficient and sustainable to make prudent use of an established quarry resource than to disregard it while pressure for future supply is directed elsewhere.

The site can also contribute to continuity and resilience of supply. The candidate site statement expressly states that continued quarrying at the wider site would provide continuity in mineral supply at this location and contribute to resilience through the provision of a consistent supply over the plan period and beyond. Existing operational or consented sites will often provide a more realistic and deliverable source of continuing supply than wholly new mineral sites.

Continued extraction would also support the construction industry through the provision of an adequate and continuous supply of minerals. This sits comfortably with BP25's recognition that the Vale is an "important supplier of Carboniferous limestone for general aggregate use" .

There are also local economic benefits. The candidate site submission refers to the maintenance of local economic benefits. An established quarrying operation supports employment, haulage, plant use, contractors and associated supply chains. Continued recognition of the site therefore supports local economic activity as well as mineral supply.

Environmental and restoration benefits are also relevant. The candidate site statement refers to benefits through new planting and habitat creation and treats restoration as part of the overall site concept. Continued quarrying should therefore not be considered solely in terms of extraction. It also creates the opportunity to secure restoration, habitat creation, landscape management and long-term after-use benefits through a modern planning framework.

A further important benefit is that any continued working would proceed under modern planning controls. The ROMP approval confirms that continued extraction has been reviewed through a contemporary planning process, that updated conditions now regulate the site, that the quarry must be worked in accordance with an approved working scheme, that annual production is capped at

250,000 tonnes, and that extraction may continue until 21 February 2042. That provides a robust and sustainable planning basis for future quarrying.
Continued recognition of Pant-y-Ffynnon Quarry within the Deposit RLDP would also ensure that the site remains properly integrated into the authority's safeguarding, buffer and minerals policy framework. That would provide clarity, consistency and transparency in the Plan.
6. Changes sought
The Deposit RLDP should not treat the absence of a current RTS2 requirement for further allocations as determinative of the planning treatment of Pant-y-Ffynnon Quarry.
The Plan should continue to recognise the consented quarry element positively within the minerals strategy.
The wider site should remain properly safeguarded within the minerals safeguarding and quarry buffer framework.
The supporting text should make clear that the absence of a new allocation reflects only the current RTS2 quantitative position and not any conclusion that the site is unsuitable in principle for continued quarrying.
The Plan should rely on its existing minerals development management policies, together with the ROMP framework and any future application process, to assess the detailed merits of continued working, associated development and restoration proposals at the site.
That approach would better reflect the site's planning status, the candidate site evidence, the ROMP determination and the wider objective of maintaining a sound and effective minerals strategy in the Vale of Glamorgan.
7. Conclusion
The Council's reliance on the statement that the 2nd Review of the Minerals Regional Technical Statement indicates that no further allocations are specifically required within the Vale of Glamorgan RLDP is too narrow a basis on which to assess Pant-y-Ffynnon Quarry.
That statement may explain why the Council has not identified a new formal mineral allocation on numerical grounds. It does not, however, justify removing or diluting positive recognition of an existing quarry site with an established planning status, a recent ROMP approval permitting continued extraction until 21 February 2042, and clear evidence of continuing supply, economic and restoration benefits.
Pant-y-Ffynnon Quarry should therefore continue to be positively recognised as part of the Vale of Glamorgan's minerals framework. The Deposit RLDP should distinguish clearly between the absence of a current need for a fresh allocation and the continuing strategic relevance of an established quarry site. In the case of Pant-y-Ffynnon Quarry, the latter plainly remains.
8. Summary
 Overall minerals strategy: Support in part / Object in part.
Seth Hill & Son Ltd supports the general objective of maintaining an adequate minerals supply and managing mineral resources through a plan-led framework. Objection is taken to the extent that the Deposit RLDP relies too narrowly on the RTS2 conclusion that no further allocations are specifically required, without properly reflecting the continuing role of Panty-Ffynnon Quarry as an existing quarry site with ongoing strategic relevance.
 Strategic minerals policy / supply and safeguarding approach: Support in part / Object in part.
The strategic objective of securing a continuous supply of minerals and safeguarding mineral resources is supported. Objection is taken insofar as that strategic approach is not properly applied to Pant-y-Ffynnon Quarry, which should continue to be recognised positively within the minerals framework notwithstanding the absence of a current need for a fresh allocation.
 Policy MIN1 – Mineral safeguarding areas: Support.
Support is given to the safeguarding of limestone resources from unnecessary sterilisation. That approach is directly relevant to Pant-y-Ffynnon Quarry, particularly given that the candidate site submission sought to retain quarry status for the consented element and to safeguard the wider site for longer-term quarrying.
 Policy MIN2 – Quarry buffer zones: Support.
The principle of retaining quarry buffer zones is supported because it protects existing and future quarrying operations from encroachment by incompatible development. Continued positive recognition of Pant-y-Ffynnon Quarry sits logically alongside that buffer framework.
 Policy MIN4 – Sustainable mineral working: Support in principle.
Support is given to the policy framework for new workings, extensions and continued mineral extraction subject to environmental safeguards, amenity protection and restoration. Pant-y-Ffynnon Quarry is capable of being assessed under that framework, and detailed issues should be dealt with through the policy and application process rather than by withholding positive plan recognition now.
 Candidate Site Assessment – Pant-y-Ffynnon Quarry: Object.
Objection is taken to the candidate site assessment insofar as it relies on the statement that no further allocations are specifically required under RTS2 as the reason for not taking the site forward positively. That reasoning is too narrow because it fails to engage with the fact that the site is an existing quarrying location, that the candidate submission sought retention of quarry status as well as longer-term safeguarding, and that the site has benefited from ROMP approval ref. 2024/00246/ENV, which permits operations until 21 February 2042.

 Status of the existing quarry site: Object to insufficient recognition.
Seth Hill & Son Ltd objects to any approach which treats Pant-y-Ffynnon Quarry as strategically unimportant simply because no new allocation is numerically required. The consented quarry element should continue to be positively recognised in the Plan, reflecting its existing planning status, updated ROMP conditions and ongoing minerals planning context.
 Benefits of continued extraction at Pant-y-Ffynnon Quarry: Positive material consideration.
Continued extraction would make productive use of an existing quarry site, avoid sterilisation of unworked reserves, provide continuity and resilience of mineral supply, support local economic benefits and allow restoration-led environmental gains through planting, habitat creation and long-term after-use. Those benefits weigh in favour of continued positive recognition of the site within the Deposit RLDP.
 Soundness and evidence base: Object to insufficiently evidence-led treatment.
The Development Plans Manual requires plans to be based on “robust evidence” so they can be delivered and links candidate sites directly to the soundness question “Will the plan deliver?” The current treatment of Pant-y-Ffynnon Quarry does not fully reflect the evidence
before the Council on the site’s planning status, deliverability and continuing operational role.
 National policy compliance – PPW, MTAN1 and SWRAWP: Support in principle / Object to incomplete application.
The broad alignment of the Deposit RLDP with national minerals policy is supported. The objection is that the Plan does not go far enough in applying PPW’s reference to “real possibilities for future mineral working”, MTAN1’s requirement for a “more realistic landbank assessment”, and SWRAWP’s warning that “Caution must be exercised in using these landbank figures” when considering the ongoing role of Pant-y-Ffynnon Quarry.
 Overall position: Support in part / Object in part.
In overall terms, Seth Hill & Son Ltd supports the Deposit RLDP’s broad minerals framework. The objection is a focused one: the Plan should more clearly distinguish between the absence of a current need for a fresh mineral allocation and the continuing strategic relevance of Panty-Ffynnon Quarry as an established quarry site with planning status, ongoing supply potential and a recent ROMP approval extending operations beyond the plan period.

Attachments:
Deposit Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3x9
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xb
Email Representation - https://valeofglamorgan.oc2.uk/a/3xc

4503 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU’R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 414 Land to the east of Fonmon Road, Rhoose / Tir i'r dwyrain o Fonmon Road, Y Rhws

Respondent: Mrs Pam Spence [2822]

Summary:
The village of Rhoose is fast becoming overbuilt leading to congestion and resulting pollution on the roads and rural areas.

Full text:
The village of Rhoose is fast becoming overbuilt leading to congestion and resulting pollution on the roads and rural areas,

Attachments: None

5484 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU’R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 414 Land to the east of Fonmon Road, Rhoose / Tir i'r dwyrain o Fonmon Road, Y Rhws

Respondent: Mrs Deborah Selley [652]

Summary:
No more houses unless you improve the infrastructure. The roads can't cope with more traffic, there aren't sufficient GP Surgeries or schools and proper affordable sustainable transport is non existent, one train an hour is pathetic. Fonmon Road, past the pond out onto the bypass is too narrow and will not cope.

Full text:
No more houses unless you improve the infrastructure. The roads can't cope with more traffic, there aren't sufficient GP Surgeries or schools and proper affordable sustainable transport is non existent, one train an hour is pathetic. Fonmon Road, past the pond out onto the bypass is too narrow and will not cope.

Attachments: None

4504 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 418 Land West of Fonmon Road, Fontygary / Tir i'r gorllewin o Fonmon Road, Ffont-y-gari

Respondent: Mrs Pam Spence [2822]

Summary:

The village of Rhoose is fast becoming overbuilt leading to congestion and resulting pollution on the roads and rural areas.

Full text:

The village of Rhoose is fast becoming overbuilt leading to congestion and resulting pollution on the roads and rural areas,

Attachments: None

5341 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 422 Land to the northeast of Llancarfan / Tir i'r gogledd-ddwyrain o Lancarfan

Respondent: Mr David Metcalf [3234]

Summary:

This land is greenfield and not in the existing footprint of this small village. Building on a site this size would completely alter the character of the village and should be avoided at all costs. The Vale should focus on brownfield sites and small infill in existing towns and villages rather than build on virgin land.

Full text:

This land is greenfield and not in the existing footprint of this small village. Building on a site this size would completely alter the character of the village and should be avoided at all costs. The Vale should focus on brownfield sites and small infill in existing towns and villages rather than build on virgin land.

Attachments: None

4404 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 436 Land between Llantwit Major and Llanmaes / Tir rhwng Llanilltud Fawr a Llan-faes

Respondent: Mrs diana bennett [2081]

Summary:

1. The proposed site would be irreversibly detrimental to the nearby Preservation Area.

2. Llanmaes is plagued with flooding/related sewage. The proposed development area is so close to the village and Llanmaes brook and without massive and costly drainage /sewage work could only cause an increase range of water runoff issues.

3.I understand that Welsh Gov policy is to avoid developments that would cause the coalescing of communities, development in this area would be in direct contravention of that.

Full text:

1. This proposed site would have an irreversibly detrimental effect on the nearby Preservation Area.
2. Llanmaes village is plagued with flooding and related sewage. I live in the village and even heavy rainfall without obvious flooding causes gurgling backup into my baths, sinks and showers. The proposed development area is so close to the village and ancient LLanmaes brook only massive and costly drainage /sewage work could only cause an increase range of water runoff issues for the whole area, if possible at all.
3. I understand that Welsh Government policy is to avoid developments that would cause the coalescing of communities, development in this area would be in direct contravention of that policy.

Attachments: None

5240 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 436 Land between Llantwit Major and Llanmaes / Tir rhwng Llanilltud Fawr a Llan-faes

Respondent: Mr and Mrs John & Patricia Harries [3186]

Petition: 2 petitioners

Summary:

Both of these sites lie within the conservation area of Llanmaes and should as such be protected from future development.

Site ID436 is currently an agricultural and recreational use area. Loss of this would be detrimental to the region and encroachment into this would effectively merge the village of Llanmaes into the town of Llantwit Major which would not be beneficial to the conservation area.

Full text:

Both of these sites lie within the conservation area of Llanmaes and should as such be protected from future development.

Site ID436 is currently an agricultural and recreational use area. Loss of this would be detrimental to the region and encroachment into this would effectively merge the village of Llanmaes into the town of Llantwit Major which would not be beneficial to the conservation area.

Site ID 379 is also within the conservation area and requires similar protection.

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/trr

4410 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 461 Land at Boverton / Tir yn Nhrebefered

Respondent: Mr Iestyn Jones [1624]

Summary:

Ecology. Flooding, traffic, allocated sites and housing sites available within the RLDP to meet the need

Full text:

Ecology. Flooding, traffic, allocated sites and housing sites available within the RLDP to meet the need

Attachments: None

4858 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 461 Land at Boverton / Tir yn Nhrebefered

Respondent: Mrs Helen Boyde [1335]

Summary:

This site is on green fields within Boverton Conservation Area and building here would significantly negatively impact the historic nature of the area as well as destroying biodiversity. There are already significant traffic issues (congestion, narrow road and blind bend) and developing here would make these worse. There is no safe pedestrian access.

Full text:

This site is on green fields within Boverton Conservation Area and building here would significantly negatively impact the historic nature of the area as well as destroying biodiversity. There are already significant traffic issues (congestion, narrow road and blind bend) and developing here would make these worse. There is no safe pedestrian access.

Attachments:

4883 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 461 Land at Boverton / Tir yn Nhrebefered

Respondent: Dr Adam Boyde [1578]

Summary:

Developing on this site, which is within the Boverton Conservation Area, would have a significantly detrimental impact on the historic nature of the area. It would also destroy a large proportion of the green fields and biodiversity with the Conservation Area. There are already significant traffic issues on the road where the site is accessed (congestion, narrow road and blind bend) and developing here would make these worse. There is no safe pedestrian access.

Full text:

Developing on this site, which is within the Boverton Conservation Area, would have a significantly detrimental impact on the historic nature of the area. It would also destroy a large proportion of the green fields and biodiversity with the Conservation Area. There are already significant traffic issues on the road where the site is accessed (congestion, narrow road and blind bend) and developing here would make these worse. There is no safe pedestrian access.

Attachments:

Objection to Candidate Sites 461,473,481.docx - https://valeofglamorgan.oc2.uk/a/sfz

4958 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 461 Land at Boverton / Tir yn Nhrebefered

Respondent: Miss Charlotte Boyde [3020]

Summary:

Building here would destroy green fields, destroy biodiversity and would be out of keeping with the Conservation Area. The road where the entrance/exit to the site is located is already heavily congested, often with queuing traffic. The road is also very narrow in places, where large vehicles can't get through without other vehicles having to manoeuvre out of their way. Increased traffic here, due to development, would make this bit of road very dangerous.

Full text:

Building here would destroy green fields, destroy biodiversity and would be out of keeping with the Conservation Area. The road where the entrance/exit to the site is located is already heavily congested, often with queuing traffic. The road is also very narrow in places, where large vehicles can't get through without other vehicles having to manoeuvre out of their way. Increased traffic here, due to development, would make this bit of road very dangerous.

Attachments:

Objections to Candidate Sites 461, 473 and 481.docx - https://valeofglamorgan.oc2.uk/a/shz

5600 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 461 Land at Boverton / Tir yn Nhrebefered

Respondent: Mr CLIVE HARTLEY [2180]

Summary:

I strongly object to the future use of Site 461 and nearby sites within the Boverton Conservation Area. These sites are of historical and environmental significance, including habitats for protected species, and their development would harm the character, green space, and wildlife. The proposed development would increase traffic congestion and pose safety risks. It conflicts with objectives of the Local Development Plan, which promotes sustainable, inclusive, and environmentally friendly development, and aims to protect natural and historic assets. The latest RLDP plan excludes these sites from future consideration.It is against RLDP Objectives 1,2,4,5 & 6.

Full text:

Sites- 461

I wish to object once again to any future use of this site for development, my objections are as follows;

Impact on Boverton Conservation Area

As detailed in the Conservation area Boverton Appraisal and management Plan dated March 2009, the Boverton Conservation area was designated in October 1972 by the former Vale of Glamorgan County Council in recognition of the specific architectural and historical interest of the village. The Conservation area, which also includes the Sites ,473 and 481, are of significant value to the area in terms of character of the buildings, and green open space, which creates a buffer between the conservation area and the B4265. The planning authority have already refused permission to build housing on these two sites in 1978, and the grounds for refusal still stands, namely that it is considered necessary to retain the land as open space to prevent physical coalescence of Boverton and West Camp/St Athan, and thereby

maintain settlement identity.
The scale of the development would be extremely intrusive in terms of the buildings and infrastructure.

Environmental impact

The area of green land provides for an important habitat for wildlife. Along the watercourse and open spaces inside the Western boundary of the site , and on the River Hoddant just metres to the West, there are otters, kingfishers, dormice, barn owls, woodpeckers and other protected species. Regardless of any mitigations that the Council may impose, and housing or retail development, and its associated infrastructure is sure to cause significant damage to the environment and these fragile populations.

Highway Implications

The development would have a major affect on the already dangerous traffic flow form the A 4265 leading to Boverton Road. This is an inadequate road network at present and cannot support the existing traffic and pedestrian flows. It is presently a dangerous route for pedestrians and children travelling to school. The boundary of the site is some 4m above the level of the road and close to other road junctions, and the inclusion of an additional road junction along this section of the road would increase the congestion impacting on the safety of the circulation.

Inappropriate use of a site within a Conservation area

The RLDP sets out a series of Objectives a number of which are not met with these sites;

Objective 1- These sites do not encourage development that reduces the need to travel by car and encourage people to participate in active travel and use sustainable transport to reduce emissions and improve air quality. The use of this site will not support increased generation of renewable and low carbon energy and reduce the need for travel by car, It will in fact do the opposite.

Objective 2- This does not ensure that ' All places offer inclusive and accessible environments for all ages that facilitate interaction with nature' It will in fact be destroying nature.

Objective 4- The use of these sites does not ensure that ' All new development will be appropriately located' and the 'character of existing communities will be protected and enhanced by developing places that respect local distinctiveness and the existing setting'. It in fact has the opposite effect.

Objective 5- States that ' Ensure that all developments make a positive contribution towards the development of a green infrastructure, protect natural habitats and soil quality, and assist in reversing the nature emergency by delivering a local net biodiversity benefit. Prioritising previously developed brownfield land for new development, directing development away for areas of nature conservation interest and safeguarding the sensitive natural environment from inappropriate development.

All of the above go directly against both sites 473 and 481.
There are opportunities for brownfield sites in Llandow and on the link road to the Aston Martin factory which is an underused expensive infrastructure.

Objective 6- 'Recognise the value of the Vales built heritage by embedding placemaking into the Planning process, to ensure that development proposals protect the Vale's historic built environment. Ensure that new developments conserve and enhance the attractive qualities of the Vales historic assets'.
Once again this objective is not recognised with he choice of these sites.

We met with Andrew Wallace on Friday 13 February 2026 at the Llantwit Major CF61 Centre. He confirmed to us that all the three sites within the Boverton Conservation area which had been put forward previously as Candidate sites will not form part of the Candidate site Stage 2 Assessment register. We were shown a copy of the latest Replacement RLDP Plan document dated December 2025) Easy read Deposit Plan) which does not include these sites.

We are putting forward our case against these sites should they ever be considered once again in the future.

Attachments:
Supporting Evidence - https://valeofglamorgan.oc2.uk/a/t3w
Supporting Document - Redacted - https://valeofglamorgan.oc2.uk/a/3p9

5998 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 461 Land at Boverton / Tir yn Nhrebefered

Respondent: Mr john wainwright [1615]

Summary:

I previously objected to sites 461, 473, and 481 within the Boverton Conservation Area during the RLDP 2021-2036 consultation. I was unable to attend the recent public meeting but learned that these sites are no longer listed in the Stage 2 Assessment Register, which I welcome. However, I wish to maintain my objection should developers propose development plans for these sites in the future.

Full text:

1. During the consultation stage for the RLDP 2021-2036 we registered our objections to the proposed candidate sites 461, 473, and 481, all within the Boverton Conservation Area.

2. I was unable to attend at the recent public meeting on Friday 23 Feb in Llantwit Major but I understand from a neighbour who you spoke with about these 3 candidate sites - that they are no longer included in the Candidate Site Stage 2 Assessment Register. This is good news as we felt very strongly that development of housing and retail on these sites would be inappropriate, especially as there are more suitable sites close by.

3. If case development plans could still be proposed by developers for these 3 sites in the future, I would like to register my ongoing objection and I will reiterate my objections using the current online consultation portal by 11 March as you recommended

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tb8

4408 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 473 Land south of the B4265 / Tir i'r de o'r B4265

Respondent: Mr Iestyn Jones [1624]

Summary:

Traffic impact with poor infrastructure . Noise. Ecology. Urban sprawl, merging Boverton with Eglwys Brewis, contravening planning policy.. Impact on conservation area and listed buildings. Impact on established town centre and local business

Full text:

Significant objections to his an neighbouring fields have been put forward from the outset so it's difficult to fathom how this site is still a candidates.
Accesss and surrounding infrastructure cannot accommodate this development. There is no demand for another supermarket in Llantwit at all, and certainly not one her AND at Llanmaes. It would be hugely detrimental to local shops within the established town centre. The scale of building required within the conservation area and the setting of listed buildings and county treasures would. Significantly detrimental to the character. Building here would erode the green space between two settlements, creating urban sprawl. The site has significant habitat with retired, owls, mammals such as weasels, fox, hedgehogs and moles. Surely the noise associated with a retail use in this location would be severely detrimental to the amenity of the local residents. The authority have demised mush smaller development of 2-3 houses, on similar grounds, where noise would clearly be less of an issue.

Attachments: None

4859 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 473 Land south of the B4265 / Tir i'r de o'r B4265

Respondent: Mrs Helen Boyde [1335]

Summary:

This site is on green fields within Boverton Conservation Area and building here would significantly negatively impact the historic nature of the area as well as destroying biodiversity. There are already significant traffic issues (congestion, narrow road and blind bend) and developing here would make these worse. There is no safe pedestrian access.

Full text:

This site is on green fields within Boverton Conservation Area and building here would significantly negatively impact the historic nature of the area as well as destroying biodiversity. There are already significant traffic issues (congestion, narrow road and blind bend) and developing here would make these worse. There is no safe pedestrian access.

Attachments:

4884 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 473 Land south of the B4265 / Tir i'r de o'r B4265

Respondent: Dr Adam Boyde [1578]

Summary:

Developing on this site, which is within the Boverton Conservation Area, would have a significantly detrimental impact on the historic nature of the area. It would also destroy a large proportion of the green fields and biodiversity with the Conservation Area. There are already significant traffic issues on the road where the site is accessed (congestion, narrow road and blind bend) and developing here would make these worse. There is no safe pedestrian access.

Full text:

Developing on this site, which is within the Boverton Conservation Area, would have a significantly detrimental impact on the historic nature of the area. It would also destroy a large proportion of the green fields and biodiversity with the Conservation Area. There are already significant traffic issues on the road where the site is accessed (congestion, narrow road and blind bend) and developing here would make these worse. There is no safe pedestrian access.

Attachments:

Objection to Candidate Sites 461,473,481.docx - https://valeofglamorgan.oc2.uk/a/sfm

4959 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 473 Land south of the B4265 / Tir i'r de o'r B4265

Respondent: Miss Charlotte Boyde [3020]

Summary:

Building here would destroy green fields, destroy biodiversity and would be out of keeping with the Conservation Area. The road where the entrance/exit to the site is located is already heavily congested, often with queuing traffic. The road is also very narrow in places, where large vehicles can't get through without other vehicles having to manoeuvre out of their way. Increased traffic here, due to development, would make this bit of road very dangerous.

Full text:

Building here would destroy green fields, destroy biodiversity and would be out of keeping with the Conservation Area. The road where the entrance/exit to the site is located is already heavily congested, often with queuing traffic. The road is also very narrow in places, where large vehicles can't get through without other vehicles having to manoeuvre out of their way. Increased traffic here, due to development, would make this bit of road very dangerous.

Attachments:

Objections to Candidate Sites 461, 473 and 481.docx - https://valeofglamorgan.oc2.uk/a/shm

5592 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 473 Land south of the B4265 / Tir i'r de o'r B4265

Respondent: Mr CLIVE HARTLEY [2180]

Summary:

I strongly oppose any future development of sites 473 and 481 within the Boverton Conservation Area. These sites are of historic and architectural significance, and their development would threaten the area's character, green spaces, and wildlife habitats, including protected species. The development would worsen traffic safety and congestion on the nearby A4265 road. The sites do not align with local objectives for sustainable, inclusive, and environmentally sensitive development. Recent plans confirm these sites are excluded from the current RLDP, but I reserve the right to oppose any future reconsideration. They go against RLDP objectives 1,2,4,5 & 6.

Full text:

Sites- 473 and 481

I wish to object once again to any future use of this site for development, my objections are as follows;

Impact on Boverton Conservation Area

As detailed in the Conservation area Boverton Appraisal and management Plan dated March 2009, the Boverton Conservation area was designated in October 1972 by the former Vale of Glamorgan County Council in recognition of the specific architectural and historical interest of the village. The Conservation area, which includes the Sites ,473 and 481, are of significant value to the area in terms of character of the buildings, and green open space, which creates a buffer between the conservation area and the B4265. The planning authority have already refused permission to build housing on these two sites in 1978, and the grounds for refusal still stands, namely that it is considered necessary to retain the land as open space to prevent physical coalescence of Boverton and West Camp/St Athan, and thereby maintain settlement identity.
The scale of the development would be extremely intrusive in terms of the buildings and infrastructure.

Environmental impact

The area of green land provides for an important habitat for wildlife. Along the watercourse and open spaces inside the Western boundary of the site , and on the River Hoddant just metres to the West, there are otters, kingfishers, dormice, barn owls, woodpeckers and other protected species. Regardless of any mitigations that the Council may impose, and housing or retail development, and its associated infrastructure is sure to cause significant damage to the environment and these fragile populations.

Highway Implications

The development would have a major affect on the already dangerous traffic flow form the A 4265 leading to Boverton Road. This is an inadequate road network at present and cannot support the existing traffic and pedestrian flows. It is presently a dangerous route for pedestrians and children travelling to school. The boundary of the site is some 4m above the level of the road and close to other road junctions, and the inclusion of an additional road junction along this section of the road would increase the congestion impacting on the safety of the circulation.

Inappropriate use of a site within a Conservation area

The RLDP sets out a series of Objectives a number of which are not met with these sites;

Objective 1- These sites do not encourage development that reduces the need to travel by car and encourage people to participate in active travel and use sustainable transport to reduce emissions and improve air quality. The use of this site will not support increased generation of renewable and low carbon energy and reduce the need for travel by car, It will in fact do the opposite.

Objective 2- This does not ensure that ‘ All places offer inclusive and accessible environments for all ages that facilitate interaction with nature’ It will in fact be destroying nature.

Objective 4- The use of these sites does not ensure that ‘ All new development will be appropriately located’ and the ‘character of existing communities will be protected and enhanced by developing places that respect local distinctiveness and the existing setting’. It in fact has the opposite effect.

Objective 5- States that ‘ Ensure that all developments make a positive contribution towards the development of a green infrastructure, protect natural habitats and soil quality, and assist in reversing the nature emergency by delivering a local net biodiversity benefit. Prioritising previously developed brownfield land for new development, directing development away for areas of nature conservation interest and safeguarding the sensitive natural environment from inappropriate development.

All of the above go directly against both sites 473 and 481.
There are opportunities for brownfield sites in Llandow and on the link road to the Aston Martin factory which is an underused expensive infrastructure.

Objective 6- 'Recognise the value of the Vales built heritage by embedding placemaking into the Planning process, to ensure that development proposals protect the Vale's historic built environment. Ensure that new developments conserve and enhance the attractive qualities of the Vales historic assets'.
Once again this objective is not recognised with he choice of these sites.

We met with Andrew Wallace on Friday 13 February 2026 at the Llantwit Major CF61 Centre. He confirmed to us that all the three sites within the Boverton Conservation area which had been put forward previously as Candidate sites will not form part of the Candidate site Stage 2 Assessment register. We were shown a copy of the latest Replacement RLDP Plan document dated December 2025) Easy read Deposit Plan) which does not include these sites.

We are putting forward our case against these sites should they ever be considered once again in the future.

Attachments:
Supporting Evidence - https://valeofglamorgan.oc2.uk/a/t37
Supporting Document - Redacted - https://valeofglamorgan.oc2.uk/a/3p7

5999 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 473 Land south of the B4265 / Tir i'r de o'r B4265

Respondent: Mr john wainwright [1615]

Summary:

I previously objected to sites 461, 473, and 481 within the Boverton Conservation Area during the RLDP 2021-2036 consultation. I was unable to attend the recent public meeting but learned that these sites are no longer listed in the Stage 2 Assessment Register, which I welcome. However, I wish to maintain my objection should developers propose development plans for these sites in the future.

Full text:

1. During the consultation stage for the RLDP 2021-2036 we registered our objections to the proposed candidate sites 461, 473, and 481, all within the Boverton Conservation Area.

2. I was unable to attend at the recent public meeting on Friday 23 Feb in Llantwit Major but I understand from a neighbour who you spoke with about these 3 candidate sites - that they are no longer included in the Candidate Site Stage 2 Assessment Register. This is good news as we felt very strongly that development of housing and retail on these sites would be inappropriate, especially as there are more suitable sites close by.

3. If case development plans could still be proposed by developers for these 3 sites in the future, I would like to register my ongoing objection and I will reiterate my objections using the current online consultation portal by
11 March as you recommended

Attachments:
Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tb8

4409 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 481 Land to the North of Boverton Road / Tir i'r gogledd o Boverton Road

Respondent: Mr Iestyn Jones [1624]

Summary:

No need for housing here, poor unsustainable location, urban sprawl, impact on ecology to name a few.

Full text:

No need for housing here, poor unsustainable location, urban sprawl, impact on ecology to name a few.

Attachments: None

4860 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 481 Land to the North of Boverton Road / Tir i'r gogledd o Boverton Road

Respondent: Mrs Helen Boyde [1335]

Summary:

This site is on green fields within Boverton Conservation Area and building here would significantly negatively impact the historic nature of the area as well as destroying biodiversity. There are already significant traffic issues (congestion, narrow road and blind bend) on the main road which adjoins this part of Boverton Road, and developing here would make these issues worse. There is no pavement for much of this stretch of road and it is narrow in places. There is also inadequate street lighting at present and increased traffic from development would make this more hazardous for pedestrians.

Full text:

This site is on green fields within Boverton Conservation Area and building here would significantly negatively impact the historic nature of the area as well as destroying biodiversity. There are already significant traffic issues (congestion, narrow road and blind bend) on the main road which adjoins this part of Boverton Road, and developing here would make these issues worse. There is no pavement for much of this stretch of road and it is narrow in places. There is also inadequate street lighting at present and increased traffic from development would make this more hazardous for pedestrians.

Attachments:

4885 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 481 Land to the North of Boverton Road / Tir i'r gogledd o Boverton Road

Respondent: Dr Adam Boyde [1578]

Summary:

Developing on this site, which is within the Boverton Conservation Area, would have a significantly detrimental impact on the historic nature of the area. It would also destroy a large proportion of the green fields and biodiversity with the Conservation Area. There are already significant traffic issues on the main road which leads up to the side road where the site is accessed (congestion, narrow road and blind bend) and developing here would make these issues worse. Increased traffic would make this busy pedestrian route unsafe.

Full text:

Developing on this site, which is within the Boverton Conservation Area, would have a significantly detrimental impact on the historic nature of the area. It would also destroy a large proportion of the green fields and biodiversity with the Conservation Area. There are already significant traffic issues on the main road which leads up to the side road where the site is accessed (congestion, narrow road and blind bend) and developing here would make these issues worse. Increased traffic would make this busy pedestrian route unsafe.

Attachments:

Objection to Candidate Sites 461,473,481.docx - https://valeofglamorgan.oc2.uk/a/sfn

4960 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 481 Land to the North of Boverton Road / Tir i'r gogledd o Boverton Road

Respondent: Miss Charlotte Boyde [3020]

Summary:

Building here would destroy green fields, destroy biodiversity and would be out of keeping with the Conservation Area. The road where the entrance/exit to the site is located is already heavily congested, often with queuing traffic. The road is also very narrow in places, where large vehicles can't get through without other vehicles having to manoeuvre out of their way. Increased traffic here, due to development, would make this bit of road very dangerous.

Full text:

Building here would destroy green fields, destroy biodiversity and would be out of keeping with the Conservation Area. The road where the entrance/exit to the site is located is already heavily congested, often with queuing traffic. The road is also very narrow in places, where large vehicles can't get through without other vehicles having to manoeuvre out of their way. Increased traffic here, due to development, would make this bit of road very dangerous.

Attachments:

Objections to Candidate Sites 461, 473 and 481.docx - https://valeofglamorgan.oc2.uk/a/shn

5594 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 481 Land to the North of Boverton Road / Tir i'r gogledd o Boverton Road

Respondent: Mr CLIVE HARTLEY [2180]

Summary:

I strongly object to future development on Site 481, which are within the Boverton Conservation Area. These sites hold significant architectural, historical, and environmental value, providing open space that prevents coalescence between settlements and supports wildlife habitats for protected species. Development would threaten local infrastructure, worsen traffic safety, and conflict with RLDP objectives promoting sustainable transport, natural habitats, and heritage conservation. Past refusals and the latest RLDP Plan exclude these sites, and I oppose their reconsideration due to their adverse impact on the area's character and environment. Its against RLDP Objectives 1,2,4,5 & 6.

Full text:

Sites- 473 and 481

I wish to object once again to any future use of this site for development, my objections are as follows;

Impact on Boverton Conservation Area

As detailed in the Conservation area Boverton Appraisal and management Plan dated March 2009, the Boverton Conservation area was designated in October 1972 by the former Vale of Glamorgan County Council in recognition of the specific architectural and historical interest of the village. The Conservation area, which includes the Sites ,473 and 481, are of significant value to the area in terms of character of the buildings, and green open space, which creates a buffer between the conservation area and the B4265. The planning authority have already refused permission to build housing on these two sites in 1978, and the grounds for refusal still stands, namely that it is considered necessary to retain the land as open space to prevent physical coalescence of Boverton and West Camp/St Athan, and thereby maintain settlement identity.
The scale of the development would be extremely intrusive in terms of the buildings and infrastructure.

Environmental impact

The area of green land provides for an important habitat for wildlife. Along the watercourse and open spaces inside the Western boundary of the site , and on the River Hoddant just metres to the West, there are otters, kingfishers, dormice, barn owls, woodpeckers and other protected species. Regardless of any mitigations that the Council may impose, and housing or retail development, and its associated infrastructure is sure to cause significant damage to the environment and these fragile populations.

Highway Implications

The development would have a major affect on the already dangerous traffic flow form the A 4265 leading to Boverton Road. This is an inadequate road network at present and cannot support the existing traffic and pedestrian flows. It is presently a dangerous route for pedestrians and children travelling to school. The boundary of the site is some 4m above the level of the road and close to other road junctions, and the inclusion of an additional road junction along this section of the road would increase the congestion impacting on the safety of the circulation.

Inappropriate use of a site within a Conservation area

The RLDP sets out a series of Objectives a number of which are not met with these sites;

Objective 1- These sites do not encourage development that reduces the need to travel by car and encourage people to participate in active travel and use sustainable transport to reduce emissions and improve air quality. The use of this site will not support increased generation of renewable and low carbon energy and reduce the need for travel by car, It will in fact do the opposite.

Objective 2- This does not ensure that ' All places offer inclusive and accessible environments for all ages that facilitate interaction with nature' It will in fact be destroying nature.

Objective 4- The use of these sites does not ensure that ' All new development will be appropriately located' and the 'character of existing communities will be protected and enhanced by developing places that respect local distinctiveness and the existing setting'. It in fact has the opposite effect.

Objective 5- States that ' Ensure that all developments make a positive contribution towards the development of a green infrastructure, protect natural habitats and soil quality, and assist in reversing the nature emergency by delivering a local net biodiversity benefit. Prioritising previously developed brownfield land for new development, directing development away for areas of nature conservation interest and safeguarding the sensitive natural environment from inappropriate

development.

All of the above go directly against both sites 473 and 481.
There are opportunities for brownfield sites in Llandow and on the link road to the Aston Martin factory which is an underused expensive infrastructure.

Objective 6- 'Recognise the value of the Vales built heritage by embedding placemaking into the Planning process, to ensure that development proposals protect the Vale's historic built environment. Ensure that new developments conserve and enhance the attractive qualities of the Vales historic assets'.
Once again this objective is not recognised with he choice of these sites.

We met with Andrew Wallace on Friday 13 February 2026 at the Llantwit Major CF61 Centre. He confirmed to us that all the three sites within the Boverton Conservation area which had been put forward previously as Candidate sites will not form part of the Candidate site Stage 2 Assessment register. We were shown a copy of the latest Replacement RLDP Plan document dated December 2025) Easy read Deposit Plan) which does not include these sites.

We are putting forward our case against these sites should they ever be considered once again in the future.

Attachments:
Supporting Evidence - https://valeofglamorgan.oc2.uk/a/t39
Supporting Document - Redacted - https://valeofglamorgan.oc2.uk/a/3p8

6000 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 481 Land to the North of Boverton Road / Tir i'r gogledd o Boverton Road

Respondent: Mr john wainwright [1615]

Summary:

I previously objected to sites 461, 473, and 481 within the Boverton Conservation Area during the RLDP 2021-2036 consultation. I was unable to attend the recent public meeting but learned that these sites are no longer listed in the Stage 2 Assessment Register, which I welcome. However, I wish to maintain my objection should developers propose development plans for these sites in the future.

Full text:

1. During the consultation stage for the RLDP 2021-2036 we registered our objections to the proposed candidate sites 461, 473, and 481, all within the Boverton Conservation Area.

2. I was unable to attend at the recent public meeting on Friday 23 Feb in Llantwit Major but I understand from a neighbour who you spoke with about these 3 candidate sites - that they are no longer included in the Candidate Site Stage 2 Assessment Register. This is good news as we felt very strongly that development of housing and retail on these sites would be inappropriate, especially as there are more suitable sites close by.

3. If case development plans could still be proposed by developers for these 3 sites in the future, I would like to register my ongoing objection and I will reiterate my objections using the current online consultation portal by
11 March as you recommended

Attachments:
Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tb8

4543 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 488 Land to the South of Rhoose train station / Tir i'r de o orsaf drenau Y Rhws

Respondent: Mrs Emma Cane [1516]

Summary:

The road network to Barry cannot cope currently with queues already back to the airport most mornings and school buses late. This plus Readers Way, St Athan and Llantwit developments all feed into 1 trunk road which cannot cope.
Active travel measures: not sufficient - needed all the way to Barry and Llantwit.
Public transport is woefully inadequate for current population.
Facilities in Rhoose inadequate for current population let alone more houses.

Full text:

The road network to Barry cannot cope currently with queues already back to the airport most mornings and school buses late. This plus Readers Way, St Athan and Llantwit developments all feed into 1 trunk road which cannot cope.
Active travel measures: not sufficient - needed all the way to Barry and Llantwit.
Public transport is woefully inadequate for current population.
Facilities in Rhoose inadequate for current population let alone more houses.

Attachments: None

5486 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 492 Land North of Porthkerry Road Tir i'r gogledd o Porthkerry Road

Respondent: Mrs Deborah Selley [652]

Summary:

No more houses unless you improve the infrastructure. The roads can't cope with more traffic, there aren't sufficient GP Surgeries or schools and proper affordable sustainable transport is non existent, one train an hour is pathetic.

Full text:

No more houses unless you improve the infrastructure. The roads can't cope with more traffic, there aren't sufficient GP Surgeries or schools and proper affordable sustainable transport is non existent, one train an hour is pathetic.

Attachments: None

6795 Comment

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 492 Land North of Porthkerry Road Tir i'r gogledd o Porthkerry Road

Respondent: Network Rail (Miss Grace Lewis, Town Planning Technician) [691]

Summary:

Candidate Sites – Porthkerry Road, Rhoose (2)

It is noted a number of candidate sites are proposed as part of the replacement local development plan. This potential site is proposed for housing and sits just north of the allocated HG1 (9) site. It should be noted that should the diversion not happen under application 2022/00733/FUL, we would have concerns about this potential allocation north of the site and so, we would look for a built intervention to provide mitigation at the crossing as a pre requisite to ensure level crossing risk is appropriately mitigated.

Full text:

Thank you for consulting us on the Vale of Glamorgan Replacement Local Development Plan. This email forms for the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

This representation focuses specifically on housing allocation HG1(9) – Land north of the railway line, Rhoose, and in particular on matters relating to movement, connectivity, and the treatment of the existing Public Right of Way (PRoW) within and adjoining the allocation.

HG1 (9)- Land Noth of the railway line Rhoose

Under this reference 339 houses are allocated on land north of the railway line, Rhoose. A planning application (2022/00733/FUL) is currently in progress on this site and Network Rail have been engaging with both the Local Planning Authority and the developer on the proposed development and the impact the houses with have on level crossing risk.

Network Rail acknowledges the strategic role of Policy SP6 – Housing Requirement in meeting identified housing needs across the Vale of Glamorgan and recognises the importance of allocating sufficient land to deliver new homes over the plan period.

However, the delivery of housing under Policy SP6 must be achieved in a manner that is safe, sustainable, and supported by appropriate infrastructure and mitigation. In this regard, Network Rail's position in relation to HG1(9) is not one of objection to housing delivery, but rather a concern that development must not proceed in the absence of measures necessary to mitigate the demonstrable safety impacts arising from increased use of the Happy Valley Public Right of Way level crossing.

Network Rail has consistently objected to residential development on land north of the railway line at Rhoose where proposals have come forward in the absence of appropriate mitigation to address increased risk at the Happy Valley PRoW level crossing. Through detailed risk assessments and sustained engagement with the Local Planning Authority, Network Rail has set out clear evidence that development of this site would result in a material increase in the number of users traversing the level crossing, which is currently used as a local community and recreational route and provides a direct pedestrian link across the Vale of Glamorgan line. It has been communicated directly to the Local Planning Authority and discussed with the developer, that a Grampian-style condition that would allow development to commence while ensuring that no occupation occurs until a diversion order submitted and decided under Section 257 of the Town and Country Planning Act 1990.

The allocation for HG1 (9) should therefore acknowledge that appropriate mitigation for the level crossing is required, in this case the stopping up and diversion of the public right of way over Happy Valley Level Crossing.

Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

In this context, the RLDP should ensure that housing delivery under Policy SP6 is explicitly contingent upon the resolution of known mitigation requirements, including those relating to the Public Right of Way and associated level crossing at Rhoose.

Candidate Sites – Porthkerry Road, Rhoose (2)

It is noted a number of candidate sites are proposed as part of the replacement local development plan. This potential site is proposed for housing and sits just north of the allocated HG1 (9) site. It should be noted that should the diversion not happen under application 2022/00733/FUL, we would have concerns about this potential allocation north of the site and so, we would look for a built intervention to provide mitigation at the crossing as a pre requisite to ensure level crossing risk is appropriately mitigated.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/384
Redacted Representation - https://valeofglamorgan.oc2.uk/a/385

4907 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 510 Gileston Farm / Fferm Silstwn

Respondent: Dr Tim Render [3016]

Summary:

This land is inappropriate for development. It is within the heritage coast and provides vital unobstructed views from public road to the sea not available anywhere else on the coast. Any development would not meet the clear policy on the heritage coast set out in the revised local development plan

Full text:

This land is inappropriate for development. It is within the heritage coast and provides vital unobstructed views from public road to the sea not available anywhere else on the coast. Any development would not meet the clear policy on the heritage coast set out in the revised local development plan

Attachments: None

6833 Comment

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 515 Treguff Fach Farm / Fferm Treguff Fach

Respondent: National Grid Electricity Transmission (Planning Enquiries) [582]

Summary:

This candidate site has NGET assets interacting with it:

LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

Full text:

Vale of Glamorgan Replacement Local Development Plan 2021-2036: Deposit Plan Consultation – March 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are

provided below.

Development Plan Document Site Asset Description

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
Aberthaw leasehold land
ABERTHAW 132KV S/S
ABERTHAW 275KV S/S
SGT2 275KV CABLE: ABERTHAW 275KV S/S
UPPER BOAT 1 275kV CABLE: ABERTHAW 275KV S/S
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 516 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 577 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 513 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 511 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 517 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

Candidate site 515 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new

development around high voltage overhead lines and other NGET assets.

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
A significant number of NGET assets – including substations – fall within Employment Opportunity Area 1, as designated within Policy EMP1. This site also appears as site 433 on the candidate sites map.

NGET do not consider that proposals of EMP1 are necessarily in conflict with these assets and are keen to ensure development is able to come forward even where its assets are present within or adjacent to an allocation. However, it is critical that the presence of these assets is suitably addressed within the supporting policy wording if Policy EMP1 is to be considered effective as otherwise the presence of NGET assets without appropriate acknowledgement will amount to significant constraints on site delivery. In particular, the electrical substations require 24/7 access including for 'abnormal indivisible loads' (AIL) and the land immediately surrounding them is also critical to their safe and secure functioning and to accommodate any change in future requirements which may arise.

It is acknowledged that, as part of masterplanning principles set out at 6.281, the policy already makes mention of existing infrastructure assets within the site and a need for a site layout to be developed that considers the sites existing infrastructure (including electrical substations) however we consider that the policy needs to go further and acknowledge the wider range of NGET assets that are within the site as well as more clearly establish how any future development needs to respond to the presence of NGET assets within the site. With this in mind, we propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

"Development will include a strategy for responding to the NGET Substations, Overhead and Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Without appropriate acknowledgement of the NGET assets present within the sites, Policy EMP1 should not be considered effective as it cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. As such, NGET object to the policy as currently drafted.

Renewable Energy Candidate Sites

A number of 'candidate sites' as included on the candidate site mapping, as listed in the above table, have NGET assets interacting with them. Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

• Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations.
• Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
• Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.
• Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.

• Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.
• Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.
If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.
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Attachments:
Email representation redacted - https://valeofglamorgan.oc2.uk/a/3hb

6828 Comment

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 516 Tregruff Farm / Fferm Treguff

Respondent: National Grid Electricity Transmission (Planning Enquiries) [582]

Summary:

This candidate site has NGET assets interacting with it:

LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
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Full text:

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National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

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National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

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Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

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A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also

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The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
A significant number of NGET assets – including substations – fall within Employment Opportunity Area 1, as designated within Policy EMP1. This site also appears as site 433 on the candidate sites map.

NGET do not consider that proposals of EMP1 are necessarily in conflict with these assets and are keen to ensure development is able to come forward even where its assets are present within or adjacent to an allocation. However, it is critical that the presence of these assets is suitably addressed within the supporting policy wording if Policy EMP1 is to be considered effective as otherwise the presence of NGET assets without appropriate acknowledgement will amount to significant constraints on site delivery. In particular, the electrical substations require 24/7 access including for 'abnormal indivisible loads' (AIL) and the land immediately surrounding them is also critical to their safe and secure functioning and to accommodate any change in future requirements which may arise.

It is acknowledged that, as part of masterplanning principles set out at 6.281, the policy already makes mention of existing infrastructure assets within the site and a need for a site layout to be developed that considers the sites existing infrastructure (including electrical substations) however we consider that the policy needs to go further and acknowledge the wider range of NGET assets that are within the site as well as more clearly establish how any future development needs to respond to the presence of NGET assets within the site. With this in mind, we propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

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The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

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

6829 Comment

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 517 Ty Draw / Tŷ Draw

Respondent: National Grid Electricity Transmission (Planning Enquiries) [582]

Summary:

This candidate site has NGET assets interacting with it:

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To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.
We would be grateful if you could add our details shown below to your consultation database, if not already included.

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.
Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.
NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.
NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here:
https://www.nationalgrid.com/document/349291/download
How to contact NGET
If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

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

6832 Comment

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 517 Ty Draw / Tŷ Draw

Respondent: National Grid Electricity Transmission (Planning Enquiries) [582]

Summary:

This candidate site has NGET assets interacting with it:

LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

Full text:

Vale of Glamorgan Replacement Local Development Plan 2021-2036: Deposit Plan Consultation – March 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate

from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site Asset Description

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
Aberthaw leasehold land
ABERTHAW 132KV S/S
ABERTHAW 275KV S/S
SGT2 275KV CABLE: ABERTHAW 275KV S/S
UPPER BOAT 1 275kV CABLE: ABERTHAW 275KV S/S
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 516 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 577 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 513 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 511 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 517 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

Candidate site 515 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the

equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
A significant number of NGET assets – including substations – fall within Employment Opportunity Area 1, as designated within Policy EMP1. This site also appears as site 433 on the candidate sites map.

NGET do not consider that proposals of EMP1 are necessarily in conflict with these assets and are keen to ensure development is able to come forward even where its assets are present within or adjacent to an allocation. However, it is critical that the presence of these assets is suitably addressed within the supporting policy wording if Policy EMP1 is to be considered effective as otherwise the presence of NGET assets without appropriate acknowledgement will amount to significant constraints on site delivery. In particular, the electrical substations require 24/7 access including for 'abnormal indivisible loads' (AIL) and the land immediately surrounding them is also critical to their safe and secure functioning and to accommodate any change in future requirements which may arise.

It is acknowledged that, as part of masterplanning principles set out at 6.281, the policy already makes mention of existing infrastructure assets within the site and a need for a site layout to be developed that considers the sites existing infrastructure (including electrical substations) however we consider that the policy needs to go further and acknowledge the wider range of NGET assets that are within the site as well as more clearly establish how any future development needs to respond to the presence of NGET assets within the site. With this in mind, we propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

"Development will include a strategy for responding to the NGET Substations, Overhead and Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Without appropriate acknowledgement of the NGET assets present within the sites, Policy EMP1 should not be considered effective as it cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. As such, NGET object to the policy as currently drafted.

Renewable Energy Candidate Sites

A number of 'candidate sites' as included on the candidate site mapping, as listed in the above table, have NGET assets interacting with them. Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-

carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

• Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations.
• Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
• Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.
• Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
• Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.
• Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.
If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.
To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.
We would be grateful if you could add our details shown below to your consultation database, if not already included.

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The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.
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https://www.nationalgrid.com/document/349291/download
How to contact NGET
If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

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

4506 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 2783 Porthkerry Road, Rhoose (2) (Option 1)/Porthkerry Road, Y Rhws (2) (Opsiwn 1)

Respondent: Mrs Pam Spence [2822]

Summary:

Green space is disappearing and congestion on the only road to Barry and Cardiff is horrific in the morning afternoon and evening commute. WE are also seeing a college for 2000 students being built with additional staff and many many cars.

The train only runs once an hour and is packed at peak times.

The bus is not direct to Cardiff and takes over an hour and a half and is only once an hour.

Your planning is not thought through. I strongly object unless trains and busses and extra roads are built

Full text:

Green space is disappearing and congestion on the only road to Barry and Cardiff is horrific in the morning afternoon and evening commute. WE are also seeing a college for 2000 students being built with additional staff and many many cars.

The train only runs once an hour and is packed at peak times,

The bus is not direct to Cardiff and takes over an hour and a half and is only once an hour.

Your planning is not thought through. I strongly object unless trains and busses and extra roads are built

Attachments: None

6796 Comment

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 2783 Porthkerry Road, Rhoose (2) (Option 1)/Porthkerry Road, Y Rhws (2) (Opsiwn 1)

Respondent: Network Rail (Miss Grace Lewis, Town Planning Technician) [691]

Summary:

Candidate Sites – Porthkerry Road, Rhoose (2)

It is noted a number of candidate sites are proposed as part of the replacement local development plan. This potential site is proposed for housing and sits just north of the allocated HG1 (9) site. It should be noted that should the diversion not happen under application 2022/00733/FUL, we would have concerns about this potential allocation north of the site and so, we would look for a built intervention to provide mitigation at the crossing as a pre requisite to ensure level crossing risk is appropriately mitigated.

Full text:

Thank you for consulting us on the Vale of Glamorgan Replacement Local Development Plan. This email forms for the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

This representation focuses specifically on housing allocation HG1(9) – Land north of the railway line, Rhoose, and in particular on matters relating to movement, connectivity, and the treatment of the existing Public Right of Way (PRoW) within and adjoining the allocation.

HG1 (9)- Land Noth of the railway line Rhoose

Under this reference 339 houses are allocated on land north of the railway line, Rhoose. A planning application (2022/00733/FUL) is currently in progress on this site and Network Rail have been engaging with both the Local Planning Authority and the developer on the proposed development and the impact the houses with have on level crossing risk.

Network Rail acknowledges the strategic role of Policy SP6 – Housing Requirement in meeting identified housing needs across the Vale of Glamorgan and recognises the importance of allocating sufficient land to deliver new homes over the plan period.

However, the delivery of housing under Policy SP6 must be achieved in a manner that is safe, sustainable, and supported by appropriate infrastructure and mitigation. In this regard, Network Rail's position in relation to HG1(9) is not one of objection to housing delivery, but rather a concern that development must not proceed in the absence of measures necessary to mitigate the demonstrable safety impacts arising from increased use of the Happy Valley Public Right of Way level crossing.

Network Rail has consistently objected to residential development on land north of the railway line at Rhoose where proposals have come forward in the absence of appropriate mitigation to address increased risk at the Happy Valley PRoW level crossing. Through detailed risk assessments and sustained engagement with the Local Planning Authority, Network Rail has set out clear evidence that development of this site would result in a material increase in the number of users traversing the level crossing, which is currently used as a local community and recreational route and provides a direct pedestrian link across the Vale of Glamorgan line. It has been communicated directly to the Local Planning Authority and discussed with the developer, that a Grampian-style condition that would allow development to commence while ensuring that no occupation occurs until a diversion order submitted and decided under Section 257 of the Town and Country Planning Act 1990.

The allocation for HG1 (9) should therefore acknowledge that appropriate mitigation for the level crossing is required, in this case the stopping up and diversion of the public right of way over Happy Valley Level Crossing.

Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

In this context, the RLDP should ensure that housing delivery under Policy SP6 is explicitly contingent upon the resolution of known mitigation requirements, including those relating to the Public Right of Way and associated level crossing at Rhoose.

Candidate Sites – Porthkerry Road, Rhoose (2)

It is noted a number of candidate sites are proposed as part of the replacement local development plan. This potential site is proposed for housing and sits just north of the allocated HG1 (9) site. It should be noted that should the diversion not happen under application 2022/00733/FUL, we would have concerns about this potential allocation north of the site and so, we would look for a built intervention to provide mitigation at the crossing as a pre requisite to ensure level crossing risk is appropriately mitigated.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/384
Redacted Representation - https://valeofglamorgan.oc2.uk/a/385

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 2798 Porthkerry Road, Rhoose (2) (Option 2)/Porthkerry Road, Y Rhws (2) (Opsiwn 2)

Respondent: Network Rail (Miss Grace Lewis, Town Planning Technician) [691]

Summary:

Candidate Sites – Porthkerry Road, Rhoose (2)

It is noted a number of candidate sites are proposed as part of the replacement local development plan. This potential site is proposed for housing and sits just north of the allocated HG1 (9) site. It should be noted that should the diversion not happen under application 2022/00733/FUL, we would have concerns about this potential allocation north of the site and so, we would look for a built intervention to provide mitigation at the crossing as a pre requisite to ensure level crossing risk is appropriately mitigated.

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The allocation for HG1 (9) should therefore acknowledge that appropriate mitigation for the level crossing is required, in this case the stopping up and diversion of the public right of way over Happy Valley Level Crossing.

Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

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Candidate Sites – Porthkerry Road, Rhoose (2)

It is noted a number of candidate sites are proposed as part of the replacement local development plan. This potential site is proposed for housing and sits just north of the allocated HG1 (9) site. It should be noted that should the diversion not happen under application 2022/00733/FUL, we would have concerns about this potential allocation north of the site and so, we would look for a built intervention to provide mitigation at the crossing as a pre requisite to ensure level crossing risk is appropriately mitigated.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/384
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4889 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 3838 Land at Bridge House Farm (Option A - Housing)/Tir yn Fferm Bridge House (Opsiwn A - Tai)

Respondent: Mrs Linda Green [1072]

Summary:

I strongly object to the development of this field which goes against Welsh planning policy with regards development in the open countryside, coalescence between town and village (rural settlement and outside the strategic growth area) and also negatively impacts the Llanmaes conservation area
I support the proposal of a green wedge in order to protect the village and land the Llanmaes side of the B4265 from development and inevitable merger with Llantwit Major.

Full text:

I strongly object to the development of this field which goes against Welsh planning policy with regards development in the open countryside, coalescence between town and village (rural settlement and outside the strategic growth area) and also negatively impacts the Llanmaes conservation area
I support the proposal of a green wedge in order to protect the village and land the Llanmaes side of the B4265 from development and inevitable merger with Llantwit Major.

Attachments: None

4411 Object

Document Element: COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR) / GLANNAU'R FRO (Y RHWS, SAIN TATHAN A LLANILLTUD FAWR), 3867 Land at Bridge House Farm (Option B - Housing and Retail)/Tir yn Fferm Bridge House (Opsiwn B - Tai a Masnachol)

Respondent: Mr matthew white [2758]

Summary:

this must not be allowed to go ahead for the following reasons:
- green belt between 2 settlements
- Llanmaes historic village needs to be protected from development, (already a conservation area)
- defamation of countryside
- greenfield site with brown field sites near by (llandow, raf st athan)
- part of this land is a flood plain
- increased traffic roads cant handle amount already
not enough services nearby to support more people (doctors, pharmacy, bus, rail)
- disruption to residents lifestyle, many people use the roads to ride horses including children riders, many cyclists use this route increased cars increased dangers

Full text:

this must not be allowed to go ahead for the following reasons:

green belt between 2 settlements
Llanmaes historic village needs to be protected from development, (already a conservation area)
defamation of country side
green field site with brown field sites near by (llandow, raf st athan)
part of this land is a flood plain
increased traffic roads cant handle amount already
not enough services nearby to support more people (doctors, pharmacy, bus, rail)
disruption to residents lifestyle, many people use the roads to ride horses including children riders, many cyclists use this route increased cars increased dangers

Attachments: None

5039 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 381 Land on the north side of Nantywern, Peterston Super Ely / Tir ar ochr ogleddol Nantywern, Llanbedr-y-fro

Respondent: Mrs Helen Kingman [3093]

Summary:

The Vale rural communities not only preserve our cultural heritage but provide a 'green lung' in the face of ever increasing development. Peterston super Ely where I have lived for 22 years already suffers from lane traffic issues and has managed to keep its strong community character due to its unique rural setting appreciated by its residents. It is also a thriving area for wildlife and birds and a regular site for ramblers. Housing developments need to be on brown sites and the vale's green rural communities need to be valued and preserved.

Full text:

The Vale rural communities not only preserve our cultural heritage but provide a 'green lung' in the face of ever increasing development. Peterston super Ely where I have lived for 22 years already suffers from lane traffic issues and has managed to keep its strong community character due to its unique rural setting appreciated by its residents. It is also a thriving area for wildlife and birds and a regular site for ramblers. Housing developments need to be on brown sites and the vale's green rural communities need to be valued and preserved.

Attachments: None

5640 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 381 Land on the north side of Nantywern, Peterston Super Ely / Tir ar ochr ogleddol Nantywern, Llanbedr-y-fro

Respondent: Kirsten Tedder [3091]

Summary:

This section of land is adjacent to National Trust protected area Lanlay Meadows and community green space including orchard. Access would not be easy and could create a dangerous cross roads at the entrance to Wyndham Park rd which is also prone to flooding. Over development of villages in the Vale will change the character of a rural village.

Full text:

This section of land is adjacent to National Trust protected area Lanlay Meadows and community green space including orchard. Access would not be easy and could create a dangerous cross roads at the entrance to Wyndham Park rd which is also prone to flooding. Over development of villages in the Vale will change the character of a rural village.

Attachments: None

5739 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 387 Land at Culverhouse Cross / Tir yng Nghroes Cwrlwys

Respondent: Mrs Bethan Britton [3346]

Summary:

Do not have the infrastructure the roads are already constantly busy. Don't have the public transport links

Full text:

Do not have the infrastructure the roads are already constantly busy. Don't have the public transport links

Attachments: None

6689 Support

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 387 Land at Culverhouse Cross / Tir yng Nghroes Cwrlwys

Respondent: Powells (Mr Stuart Leaver, Head of Planning & Land Promotion) [887]

Summary:

The site presents a deliverable, sustainable and policy-aligned opportunity to address significant affordable housing need within the Wenvoe housing market area. Despite Culverhouse Cross being identified as a Primary Settlement within the RLDP settlement hierarchy, the Deposit Plan does not allocate any residential development within the settlement.

Candidate Site CS387 occupies a contained position adjacent to the existing urban edge of Culverhouse Cross. Green Wedge in this location has been defined as performing a low function in terms of preventing coalescence which is set out within the Councils' own Green Wedge study.

Development of the site would represent a logical rounding-off of the settlement rather than an incursion into open countryside.

The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge. The development would therefore not undermine the strategic objective of preventing coalescence between Culverhouse Cross and Cardiff.

The site is available, viable and capable of being delivered within the early years of the Plan period. Importantly, the site does not rely on complex land assembly, strategic infrastructure investment or long lead-in times that often delay the delivery of larger strategic allocations.
Key deliverability characteristics include:
• Single land ownership
• No abnormal infrastructure requirements
• Existing access arrangements
• Demonstrated viability

A scheme of around 50 homes represents an appropriate and sustainable level of development which would:
• Provide a meaningful contribution towards meeting local affordable housing need within the Wenvoe ward. • Integrate effectively with the existing built form at the edge of Culverhouse Cross. • Avoid the need for large-scale urban expansion or major infrastructure investment. • Maintain the wider strategic function of the surrounding Green Wedge through a contained and well-designed development footprint.

Full text:

1. Introduction
This representation is submitted on behalf of Powells as land promoters of Candidate Site CS387 at Culverhouse Cross. The representation seeks to set out our comments on the RLDP draft deposit as well as set forward the case for the allocation of the site within the Vale of Glamorgan Replacement Local Development Plan (RLDP) for residential development of up to 50 dwellings, including a minimum of 50% affordable housing.
The site presents a deliverable, sustainable and policy-aligned opportunity to address significant affordable housing need within the Wenvoe housing market area. Despite Culverhouse Cross being identified as a Primary Settlement within the RLDP settlement hierarchy, the Deposit Plan does not allocate any residential development within the settlement.
This approach results in a number of fundamental inconsistencies within the Plan including:
• A settlement hierarchy that identifies Culverhouse Cross as a Primary Settlement but provides no growth.
• Evidence of significant affordable housing need within the Wenvoe ward that is not spatially addressed.
• Policy mechanisms intended to support affordable housing delivery (HG4 and HG5) that cannot realistically operate due to Green Wedge constraints.
• A spatial strategy that places disproportionate emphasis on rail-based settlements despite national policy promoting a wider placemaking-led approach to sustainability.
The representation therefore demonstrates that the RLDP is unsound in respect of Culverhouse Cross and that Candidate Site CS387 represents a sustainable and deliverable allocation capable of addressing identified housing need.

2. Settlement Hierarchy and Spatial Strategy
2.1 Primary Settlement Status
The Deposit RLDP identifies Culverhouse Cross as a Primary Settlement outside the Strategic Growth Area within the settlement hierarchy. Under Policy SP2, Primary Settlements represent the highest tier of settlement outside the strategic growth corridor and are identified as locations capable of accommodating limited but proportionate levels of development, reflecting their relative accessibility, services, employment opportunities and role within the wider settlement network.
In spatial planning terms, the identification of a settlement as a Primary Settlement carries clear strategic implications. It indicates that the settlement performs an important functional role within the authority and that it represents one of the most sustainable locations for accommodating development outside the Strategic Growth Area. The hierarchy therefore provides the principal framework through which the Plan distributes housing growth across the authority.
However, despite this designation, the RLDP allocates no housing growth whatsoever within Culverhouse Cross.
This creates a clear inconsistency between the settlement hierarchy and the spatial distribution of development. If a settlement is identified within the hierarchy as capable of supporting development, the development plan should logically identify opportunities through which that growth can occur. The absence of any allocations, windfall capacity or clearly defined delivery mechanisms means that the designation has no practical effect within the spatial strategy.
In technical planning terms this weakens the internal coherence of the Plan. The Development Plans Manual requires that the spatial strategy and settlement hierarchy operate as a clear and consistent framework guiding the distribution of development. Where a hierarchy identifies settlements as sustainable locations for growth but the Plan subsequently

provides no mechanism for that growth to occur, the hierarchy risks becoming descriptive rather than operational.
In the case of Culverhouse Cross, the RLDP acknowledges the settlement's role within the hierarchy but does not translate that role into spatial planning outcomes. The settlement was identified as a Primary Settlement largely due to its functional role as a significant retail, employment and transport hub, together with the recent residential redevelopment of the former ITV studios which has increased its residential function. Whilst the Council appears to treat this redevelopment as a one-off brownfield opportunity that does not justify further greenfield growth, the reality is that the decision to redevelop the site for housing rather than employment has established the principle that residential development is appropriate in this location. When considered alongside the settlement's designation as a Primary Settlement, this demonstrates that the Council itself has already accepted the sustainability of residential growth at Culverhouse Cross. Despite these characteristics, the allocation strategy effectively treats Culverhouse Cross as if it were a settlement where growth is not supported, thereby failing to reflect the very factors that justified its elevation within the settlement hierarchy.
The complete absence of housing allocations at Culverhouse Cross therefore undermines the credibility of the hierarchy and creates an incoherent spatial strategy, particularly where other settlements within the same tier of the hierarchy are expected to accommodate growth. Applying unequal weight to settlements within the same settlement category introduces inconsistency into the spatial strategy and raises concerns regarding the overall soundness of the Plan.
2.2 Consequences of the Current Approach
The failure to allocate development in Culverhouse Cross has several important consequences for the effectiveness of the Plan.
• Unmet Local Housing Need – Local affordable housing needs within the Wenvoe ward are not addressed within the spatial distribution of development. The RLDP therefore fails to demonstrate how identified housing need within this part of the authority will be met.
• Ineffective Settlement Hierarchy – The settlement hierarchy fails to operate as a meaningful spatial planning tool. If Primary Settlements are not expected to accommodate any development, the distinction between settlement tiers becomes blurred and the hierarchy ceases to function as a mechanism for directing growth.
• Displacement of Development Pressure – Housing demand associated with the eastern Vale is displaced to other settlements rather than being distributed across the settlement network in accordance with the hierarchy. This results in an imbalanced spatial strategy.
• Loss of Sustainable Small-Scale Opportunities – Opportunities for small-scale affordable housing delivery in locations close to employment, services and public transport are lost. This is particularly relevant in the case of Culverhouse Cross which functions as a significant employment and retail centre.
• Policy Mechanisms That Cannot Operate – The Plan relies on affordable housing exception mechanisms to deliver housing within settlements such as Culverhouse Cross. However, the extent of Green Wedge designation means that these mechanisms cannot realistically function without explicit clarification within the Plan.
Taken together these issues demonstrate that the current spatial strategy does not fully respond to the functional role of Culverhouse Cross within the settlement hierarchy and results in a distribution of development that is neither balanced nor responsive to local housing needs.
3. Affordable Housing Need and Delivery
3.1 Evidence of Need
The Council's own housing evidence demonstrates a substantial requirement for affordable housing across the Vale of Glamorgan, including within rural settlements and the Wenvoe housing market area. The Local Housing Market Assessment identifies a significant backlog of need together with an ongoing annual requirement for additional affordable homes throughout the plan period. Whilst Welsh Government has queried the justification for elevating Culverhouse Cross to Primary Settlement status during the plan preparation process, the available evidence demonstrates that the settlement performs a clear functional role within the eastern Vale. In particular, the settlement benefits from strong bus connectivity to Cardiff and Barry together with established cycle and active travel links, and it sits within a ward where unmet affordable housing need has been clearly identified. When these factors are considered together, they reinforce the rationale for recognising Culverhouse Cross as a sustainable location capable of accommodating proportionate residential growth. This evidence confirms that the need for affordable housing is not confined to the authority's largest settlements but exists across the wider settlement network, including rural wards.
Affordable housing need is particularly acute for smaller one to three bedroom homes, reflecting the changing composition of households and the prevalence of single person and smaller family households. Waiting list data demonstrates significant unmet demand across the authority, particularly for social rented and intermediate homes that are accessible to lower and middle income households.
Within the Wenvoe ward specifically, housing register data identifies a clear need for affordable housing that cannot currently be met through existing supply. This indicates that households with a local connection to the area are unable to access suitable housing within their own community and must either remain in unsuitable accommodation or relocate to other settlements.
Despite this evidence, the RLDP does not allocate any sites capable of delivering affordable housing within Culverhouse Cross or Wenvoe. The absence of allocations means that the Plan does not clearly demonstrate how identified affordable housing needs arising within this part of the authority will be addressed. In spatial planning terms this raises concerns regarding the effectiveness of the Plan, as development plans are expected to respond directly to evidenced housing need and ensure that opportunities for affordable housing delivery are distributed across the settlement hierarchy rather than concentrated solely within a limited number of locations.
3.2 Role of Affordable Housing in the RLDP
The RLDP identifies a requirement to deliver a significant number of affordable homes during the plan period in order to respond to the substantial backlog of need identified within the Local Housing Market Assessment. In practice the Plan relies upon several delivery mechanisms to achieve this target, including:

• Affordable housing contributions secured through Section 106 agreements on market housing sites • Affordable housing-led allocations delivering a minimum proportion of affordable homes • Affordable housing exception sites outside settlement boundaries • Windfall development opportunities that may arise during the plan period
For the overall strategy to be effective, these mechanisms must operate across the settlement hierarchy so that affordable housing delivery is not overly concentrated in a small number of locations. However, in the case of Culverhouse Cross none of these mechanisms realistically provide delivery opportunities. There are no allocated housing sites within the settlement capable of generating affordable housing contributions, no affordable housing-led allocations within the settlement boundary, and the extensive Green Wedge designation surrounding the settlement significantly constrains the realistic operation of the affordable housing exception site policy. In practical terms this means that, despite clear evidence of unmet affordable housing need within the Wenvoe ward, the RLDP does not identify any credible mechanism through which that need could be addressed locally. This further reinforces the conclusion that the spatial strategy fails to respond effectively to evidenced housing need in this part of the authority.
4. Policy HG4 and HG5 – Practical Deliverability
4.1 Affordable Housing Led Sites (HG4)
Policy HG4 identifies affordable housing-led allocations delivering a minimum of 50% affordable housing.
However these sites are located within settlement boundaries.
At Culverhouse Cross there are no available sites within the settlement boundary capable of delivering such schemes.
As a result HG4 cannot operate as an effective delivery mechanism in this settlement.
4.2 Affordable Housing Exception Sites (HG5)
Policy HG5 allows small-scale affordable housing exception sites outside settlement boundaries where a clear local need is demonstrated.
Culverhouse Cross is specifically identified as a settlement where exception sites may be appropriate.
However the majority of land surrounding the settlement is designated as Green Wedge.
The RLDP does not clearly explain how Policy HG5 should operate where land is also designated as Green Wedge.
This creates a policy ambiguity.
If Green Wedge policy prevents the operation of HG5 entirely, then the policy mechanism identified by the Council for delivering affordable housing in these settlements cannot realistically function.
If HG5 is intended to operate within Green Wedges where the strategic function of the designation is not harmed, then the Plan should make this clear.
Without this clarification the Plan risks creating theoretical delivery mechanisms that cannot be implemented in practice.
5. Green Wedge Considerations
5.1 Purpose of Green Wedges
Green Wedge designations are local planning policy tools used to manage the form of settlements and prevent inappropriate expansion of built development into open countryside. Planning Policy Wales explains that Green Wedges perform a similar function to Green Belts at a local level and are primarily intended to protect the spatial separation between settlements and maintain the distinction between urban areas and the countryside.
Green Wedges are typically designated where there is demonstrable development pressure and where reliance solely on settlement boundaries would not be sufficient to maintain the desired urban form. Their purpose is therefore strategic rather than absolute: they are intended to guide the form and direction of development rather than impose a blanket prohibition on all development.
National policy identifies five principal purposes for Green Wedges:
• Preventing the coalescence of large towns or cities with neighbouring settlements. • Managing urban form through controlled expansion of urban areas. • Assisting in safeguarding the countryside from encroachment. • Protecting the setting of urban areas. • Assisting urban regeneration by encouraging the recycling of urban land.
Planning Policy Wales also makes clear that Green Wedges should be reviewed as part of the development plan process and should only be retained where there is a demonstrable need for their continued designation.
5.2 Evidence from the Green Wedge Assessment
The Council's own Green Wedge Background Paper (BP27) assesses the land surrounding Culverhouse Cross as part of Green Wedge MG18 (3) – North of Wenvoe. The study divides the designation into a number of parcels (NW1, NW2 and NW3) and assesses their contribution against the five Green Wedge purposes.
Importantly, the assessment demonstrates that land immediately adjoining the urban edge of Culverhouse Cross does not perform a uniformly strong Green Wedge function.
For example, Parcel NW1 – which lies adjacent to the commercial and highway infrastructure associated with Culverhouse Cross – is identified as making only a weak contribution to the purpose of preventing settlement coalescence and a weak contribution to protecting the setting of the urban area, with an overall contribution rating of Moderate.
Similarly, Parcel NW2 – which also lies adjacent to the settlement edge – is assessed as making only a moderate contribution to preventing settlement coalescence and managing urban form, while again making only a weak contribution to protecting the setting of the settlement.
The study explicitly notes that some parcels around Culverhouse Cross do not lie within a gap where coalescence between settlements would occur, and therefore make only a limited contribution to that purpose.
These findings are important because they demonstrate that the Green Wedge designation in this location performs a varied and nuanced role rather than representing land of uniformly high strategic importance.
5.3 Relationship of the Site to the Green Wedge
Candidate Site CS387 occupies a contained position immediately adjacent to the existing urban edge of Culverhouse Cross. In spatial terms the site sits within an area where the Green Wedge assessment identifies only a moderate contribution to the strategic purposes of the designation.
The Green Wedge study also recognises that the retail park, major highway infrastructure and recent residential

development at the former ITV studios site exert an urbanising influence on the surrounding land.
Against this context, the development of a small and contained residential scheme adjacent to the settlement boundary would represent a logical rounding-off of the urban edge rather than a significant extension of built form into the wider countryside.
The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge. Landscape buffers and retained open areas would ensure that the remaining Green Wedge continues to fulfil its strategic function.
Importantly, the Green Wedge assessment itself acknowledges that the area around Culverhouse Cross experiences development pressure due to its relatively sustainable location on the western edge of Cardiff and its strong highway accessibility.
In this context, it is necessary for the development plan to strike a balance between protecting the strategic purposes of the Green Wedge and responding to identified housing needs. The limited and carefully contained development proposed at Candidate Site CS387 would achieve this balance by delivering much needed affordable housing while maintaining the wider strategic function of the Green Wedge.
5.4 Implications for the Spatial Strategy
Candidate Site CS387 occupies a contained position adjacent to the existing urban edge of Culverhouse Cross. Green Wedge in this location has been defined as performing a low function in terms of preventing coalescence which is set out within the Councils' own Green Wedge study.
Development of the site would represent a logical rounding-off of the settlement rather than an incursion into open countryside.
The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge.
The development would therefore not undermine the strategic objective of preventing coalescence between Culverhouse Cross and Cardiff.
6. Sustainability of Culverhouse Cross
6.1 Functional Sustainability
Culverhouse Cross functions as a significant employment, retail and service centre within the eastern Vale of Glamorgan and forms one of the principal commercial hubs on the western edge of Cardiff. Although the settlement has historically been characterised primarily by commercial uses, recent residential development has strengthened its role as a mixed-use location where people can live, work and access services within close proximity.
The settlement benefits from a number of key sustainability characteristics which support its role within the settlement hierarchy, including:
• Major retail and employment areas including the Valegate and Culverhouse Cross retail parks which provide a substantial range of jobs and services. • Frequent bus services linking the settlement with Cardiff, Barry and surrounding communities. • Access to established active travel routes connecting the settlement with nearby residential areas and employment locations. • Immediate proximity to strategic highway infrastructure including the A48 and A4232, providing direct connectivity to Cardiff and the wider regional road network.
Taken together, these characteristics mean that Culverhouse Cross operates as a highly accessible location where residents are able to access employment, retail and service opportunities within walking distance or via short public transport journeys. The presence of significant employment uses within the settlement further reduces the need for long-distance commuting and supports the creation of a more self-contained and sustainable community.
Importantly, sustainability within national planning policy is not defined solely by the presence of rail infrastructure but rather by the ability of residents to access services, employment and facilities through a range of transport modes. In this respect Culverhouse Cross performs strongly due to the combination of employment opportunities, public transport connectivity and proximity to Cardiff.
6.2 Alignment with National Policy
National planning policy promotes development in locations where people are able to access jobs, services and community facilities without the need for excessive travel. Planning Policy Wales in particular emphasises the importance of locating new housing in places that support sustainable placemaking outcomes and reduce reliance on private car travel.
Culverhouse Cross clearly meets these criteria. The settlement provides immediate access to employment, retail, healthcare and service facilities together with strong public transport connections into Cardiff and other nearby settlements. This level of accessibility is entirely consistent with the principles of sustainable development promoted through national planning policy.
The absence of a rail station does not in itself render a location unsustainable. Many settlements across Wales function successfully as sustainable communities without direct rail connectivity where other transport options and local services are available.
An approach to spatial planning which places disproportionate emphasis on rail-based settlements risks overlooking locations such as Culverhouse Cross which already function as important employment and service centres within the wider settlement network. A transport strategy focused solely on rail connectivity fails to recognise the role of bus services, active travel and proximity to employment in supporting sustainable communities.
7. Site Suitability and Deliverability
7.1 Deliverability
The site is available, viable and capable of being delivered within the early years of the Plan period. Importantly, the site does not rely on complex land assembly, strategic infrastructure investment or long lead-in times that often delay the delivery of larger strategic allocations.
Key deliverability characteristics include:
• Single land ownership – The site is controlled by a single, motivated landowner working in partnership with an

experienced land promoter. This removes the risk of fragmented ownership which can frequently delay the delivery of allocated sites.
• No abnormal infrastructure requirements – The site does not require strategic highway works, major utility diversions or significant ground remediation. Development can therefore proceed without the need for substantial upfront infrastructure investment.
• Existing access arrangements – The site benefits from an established access point which currently serves the lawful dog-walking business operating on the land. This demonstrates that the site already functions as an accessible and serviced parcel of land and reduces the complexity of future development.
• Demonstrated viability – Preliminary development appraisal work indicates that the site can support a scheme delivering approximately 50 dwellings including a minimum of 50% affordable housing while remaining financially viable. This reflects realistic build costs and values within the local housing market.
Taken together, these factors demonstrate that the site represents a deliverable short-term opportunity capable of contributing to the Council's housing supply early in the plan period. This is particularly important given the well-recognised need for development plans to allocate sites that can deliver housing quickly rather than relying solely on longer-term strategic sites.
7.2 Development Capacity
The proposed site could deliver approximately 50 dwellings, including a minimum of 50% affordable housing, in accordance with the objectives of Policy HG4 and the wider affordable housing strategy within the RLDP.
This scale of development has been carefully considered to ensure that it reflects the role of Culverhouse Cross within the settlement hierarchy while remaining proportionate to the size and character of the settlement. As a Primary Settlement outside the Strategic Growth Area, Culverhouse Cross is identified as a location capable of accommodating limited but meaningful levels of growth that support local housing needs.
A scheme of around 50 homes represents an appropriate and sustainable level of development which would:
• Provide a meaningful contribution towards meeting local affordable housing need within the Wenvoe ward. • Integrate effectively with the existing built form at the edge of Culverhouse Cross. • Avoid the need for large-scale urban expansion or major infrastructure investment. • Maintain the wider strategic function of the surrounding Green Wedge through a contained and well-designed development footprint.
Importantly, the proposed capacity reflects a small-scale extension to the existing settlement, rather than a strategic urban expansion. This approach aligns with the spatial strategy for Primary Settlements outside the Strategic Growth Area, where proportionate growth is expected to occur through modest and deliverable sites capable of meeting local needs.
The proposed allocation would therefore represent a logical and sustainable opportunity for residential development that complements the role of Culverhouse Cross within the settlement hierarchy while supporting the delivery of much-needed affordable housing.
8. Soundness of the RLDP
For a development plan to be considered sound it must satisfy the key tests set out within the Development Plans Manual and national planning policy. In summary, a sound plan must be:
• Justified – founded on a robust and credible evidence base and representing the most appropriate strategy when considered against reasonable alternatives. • Effective – deliverable over the plan period with clear and realistic mechanisms for implementation. • Consistent with national policy – aligned with the principles and objectives of Planning Policy Wales and the wider framework for sustainable placemaking.
The current RLDP approach to Culverhouse Cross raises significant concerns in relation to each of these tests.
Justified
The Plan identifies Culverhouse Cross as a Primary Settlement outside the Strategic Growth Area, recognising its accessibility, employment function and role within the wider settlement network. However, despite this designation, the RLDP allocates no housing growth whatsoever within the settlement.
This creates a clear disconnect between the evidence underpinning the settlement hierarchy and the spatial strategy that flows from it. If the evidence base demonstrates that Culverhouse Cross is sufficiently sustainable to be classified as a Primary Settlement, it logically follows that the Plan should provide opportunities for proportionate residential growth within or adjoining the settlement.
The absence of any allocations therefore raises questions as to whether the spatial strategy represents the most appropriate approach when considered against reasonable alternatives. In particular, the Plan does not adequately explain why modest growth opportunities adjacent to the settlement boundary – such as the proposed allocation of Candidate Site CS387 – have been discounted despite their potential to deliver significant levels of affordable housing.
Effective
A development plan must demonstrate that its strategy can be realistically delivered over the plan period. In this case the RLDP relies heavily on a number of policy mechanisms to deliver affordable housing, including market-led allocations, affordable housing-led sites and rural exception sites.
However, these mechanisms are not capable of operating effectively within Culverhouse Cross. There are no allocated sites within the settlement capable of generating affordable housing contributions, no affordable housing-led allocations within the settlement boundary, and the extensive Green Wedge designation surrounding the settlement severely restricts the realistic operation of affordable housing exception sites.
As a result, although the Plan identifies a clear need for affordable housing within the Wenvoe ward, it fails to identify any credible delivery mechanism through which that need could be addressed locally. This creates a clear risk that the Plan will not deliver the spatial distribution of affordable housing that its evidence base identifies as necessary.
Consistent with National Policy
Planning Policy Wales places strong emphasis on sustainable placemaking and the creation of communities where people are able to access employment, services and facilities without the need for excessive travel. National policy also

promotes the efficient use of land and encourages development in locations that already benefit from strong transport connections and established infrastructure.
Culverhouse Cross performs strongly against these principles. The settlement functions as a major retail and employment hub on the western edge of Cardiff and benefits from frequent bus services, active travel links and immediate access to strategic road infrastructure.
The spatial strategy set out in the RLDP does not fully reflect these placemaking principles. By directing growth away from Culverhouse Cross despite its accessibility and service base, the Plan risks overlooking opportunities to deliver sustainable residential development in locations where people can live close to employment and services.
Taken together, these issues demonstrate that the current strategy for Culverhouse Cross is not fully justified by the evidence, cannot be shown to operate effectively in practice, and does not fully reflect the wider objectives of national planning policy. The allocation of Candidate Site CS387 would provide a practical and proportionate means of addressing these shortcomings while supporting the delivery of affordable housing within a sustainable settlement location.
9. Proposed Modification
To address the issues identified throughout this representation it is recommended that the RLDP be modified to allocate Candidate Site CS387, Land at Culverhouse Cross, for residential development. The allocation would represent a modest and proportionate extension to the existing settlement boundary and would provide a practical mechanism through which the Plan could respond to clearly identified affordable housing needs within the Wenvoe ward.
The modification would ensure that the spatial strategy properly reflects the role of Culverhouse Cross within the settlement hierarchy while maintaining the strategic purposes of the surrounding Green Wedge designation.
The allocation should provide for:
• Up to 50 dwellings delivered as a carefully planned settlement edge scheme which integrates with the existing built form at Culverhouse Cross.
• A minimum of 50% affordable housing, ensuring that the development makes a meaningful contribution towards meeting the substantial backlog of affordable housing need identified within the Local Housing Market Assessment and the housing register for the Wenvoe ward.
• Landscape buffers and retained open space, designed to maintain visual openness and ensure that the remaining Green Wedge continues to fulfil its strategic function in preventing the coalescence of settlements.
Incorporating this allocation within the RLDP would enable the Plan to:
• Address locally evidenced housing need by providing an opportunity to deliver affordable homes within the community where demand has been identified.
• Support the role of Culverhouse Cross as a Primary Settlement by allowing proportionate residential growth that reflects the settlement's accessibility, employment base and transport connectivity.
• Deliver affordable housing in a sustainable location, close to employment areas, retail services and public transport routes.
• Provide a deliverable short-term housing site capable of contributing to housing supply early in the plan period.
• Maintain the strategic function of the Green Wedge by focusing development on a contained parcel of land adjacent to the urban edge while retaining substantial areas of open land.
• Improve the effectiveness and soundness of the RLDP by ensuring that the spatial strategy properly aligns with the settlement hierarchy and that credible delivery mechanisms exist for affordable housing within this part of the authority.
Alternative Policy Approach
In the event that the Council is not minded to allocate Candidate Site CS387, an alternative and equally effective modification would be to introduce a policy mechanism that allows affordable housing-led windfall sites within Primary Settlements located in Green Wedge designations, where it can be clearly demonstrated that development would not undermine the strategic purpose of the Green Wedge.
Such a policy could allow modest residential schemes where:
• the development is affordable housing-led, providing a significant proportion of affordable homes; • the site is adjacent to the existing settlement boundary and represents a logical rounding-off of the urban edge; • it can be demonstrated that the development would not result in unacceptable coalescence between settlements; • the scheme retains sufficient open land and landscape buffers to maintain the wider openness of the Green Wedge.
Introducing such a mechanism would provide a practical means of ensuring that affordable housing needs in settlements such as Culverhouse Cross can be addressed without undermining the strategic purpose of the Green Wedge designation. It would also resolve the current policy ambiguity whereby the Plan identifies settlements such as Culverhouse Cross as suitable locations for affordable housing exception sites but does not clearly explain how such sites can come forward where surrounding land lies within the Green Wedge.
This approach would therefore improve the effectiveness, flexibility and soundness of the RLDP by ensuring that affordable housing delivery mechanisms can operate in practice across the full settlement hierarchy.
10. Conclusion
Culverhouse Cross represents a sustainable and appropriate location for small-scale residential growth when considered against the evidence base underpinning the RLDP and the wider objectives of national planning policy. The settlement functions as an established employment, retail and service hub on the western edge of Cardiff and benefits from strong public transport connections, active travel links and direct access to strategic highway infrastructure. These characteristics have already been recognised through the Council's decision to designate Culverhouse Cross as a Primary Settlement within the settlement hierarchy.
Despite this designation, the RLDP does not allocate any housing within the settlement and does not identify any credible mechanism through which locally arising housing needs can be addressed. This creates a clear inconsistency within the spatial strategy. A settlement which is recognised as sustainable and capable of accommodating proportionate levels of development cannot logically be treated as a location where no growth is expected to occur.

The absence of allocations also prevents the delivery of much-needed affordable housing within the Wenvoe ward, where the Council's own evidence identifies a clear and persistent backlog of need. Without opportunities for development within or adjoining Culverhouse Cross, households with a local connection to the area are likely to be displaced to other settlements, undermining the objective of creating balanced and inclusive communities across the Vale of Glamorgan. Candidate Site CS387 provides a deliverable and policy-compliant opportunity to address this issue. The site represents a modest and contained extension to the existing settlement boundary and is capable of delivering approximately 50 dwellings including a minimum of 50% affordable housing. The proposal has been carefully designed to integrate with the existing built form, maintain the wider function of the surrounding Green Wedge and provide a meaningful contribution towards meeting local housing needs.
Allocating the site would therefore provide a practical and proportionate means of improving the effectiveness of the RLDP. It would ensure that the spatial strategy properly reflects the role of Culverhouse Cross within the settlement hierarchy, provide a credible mechanism for delivering affordable housing within this part of the authority and support sustainable placemaking in accordance with national planning policy.
For these reasons it is considered that Candidate Site CS387 should be allocated within the RLDP. Doing so would help ensure that the Plan provides a coherent, deliverable and policy-compliant framework for guiding development across the Vale of Glamorgan over the plan period.

Attachments:
Email representation redacted - https://valeofglamorgan.oc2.uk/a/35v

5456 Support

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 393 Wenvoe Quarry / Chwarel Gwenfô

Respondent: Breedon Trading Limited (Mr Shaun Denny, Planner) [676]

Summary:

The Company feels that Wenvoe Quarry should be identified by the Plan as a suitable location for residues arising from the treatment of Construction and Demolition Waste (CDW) which has previously been subjected to recycling (according with national policy) or material not suitable for recycling such as clays would be imported. Such a facility would be a direct replacement for the closed Whitehall site in the Vale; indeed the Company believes there are no such facilities remaining in the greater Cardiff area and that the closest, Hendy Quarry in Rhondda Cynon Taf is close to closure. Such a development presents a significant opportunity to both improve biodiversity and health and safety through the restoration of the quarries void by importing suitable restoration materials and this should be specifically recognised by the Plan through designation. A drawing illustrating a potential restoration concept is submitted.

Full text:

The Company feels that Wenvoe Quarry should be identified by the Plan as a suitable location for residues arising from the treatment of Construction and Demolition Waste (CDW) which has previously been subjected to recycling (according with national policy) or material not suitable for recycling such as clays would be imported. Such a facility would be a direct replacement for the closed Whitehall site in the Vale; indeed the Company believes there are no such facilities remaining in the greater Cardiff area and that the closest, Hendy Quarry in Rhondda Cynon Taf is close to closure. Such a development presents a significant opportunity to both improve biodiversity and health and safety through the restoration of the quarries void by importing suitable restoration materials and this should be specifically recognised by the Plan through designation. A drawing illustrating a potential restoration concept is submitted.

Attachments:

6911 Support

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 437 Swn Y Coed, Wenvoe / Sŵn y Coed, Gwenfô

Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

The site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high
quality housing development in a sustainable location. It provides an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place. The site benefits from excellent accessibility the local public transport network, active travel routes and local services.

As set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available. Any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period.

Full text:

1. INTRODUCTION

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

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

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

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

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

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

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Settlement Pattern

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

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

2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Need

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

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

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

3. RLDP KEY THEMES, VISION, AND OBJECTIVES

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

Key Themes

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

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

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

Vision

3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance

of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the

proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

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

Policy SP2 – Settlement Hierarchy

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

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

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

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

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

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

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

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

Policy SP4 - Placemaking

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

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

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

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

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

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

Policy PGD1 – Creating Well Designed and Inclusive Places

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

Policy PGD2 – Residential Development Densities

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

5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable

space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe –

Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

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

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the

need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the

scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.

• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).

• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).

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

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

• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.

• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.

• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:

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

i. Space heating demand less than or equal to 40kWh/m2/year;

ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

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

introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
•

Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

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

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

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

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

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

5740 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 441 Land at The Downs / Tir yn The Downs

Respondent: Mrs Bethan Britton [3346]

Summary:

Unnecessary, impact on environment and to community. We do not have the infrastructure for this.

Full text:

Unnecessary, impact on environment and to community. We do not have the infrastructure for this.

Attachments: None

5035 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 454 Land at Peterston Super Ely Option 1 / Tir yn Llanbedr-y-fro, Opsiwn 1

Respondent: Kirsten Tedder [3091]

Summary:

Development in smaller villages that are only accessed via narrow lanes should really not be considered. Both Peterston Super Ely and Pendoylan regularly have lanes jammed up with traffic cutting through from A48 to M4 and additional development will only cause further chaos. There are also a few brownfields sites that are not considered why not? Taking over the green space in these Vale villages will change the character and attraction of these rural communities. Development priorities should be placed where extending existing town and urban areas in my view. Thank you.

Full text:

Development in smaller villages that are only accessed via narrow lanes should really not be considered. Both Peterston Super Ely and Pendoylan regularly have lanes jammed up with traffic cutting through from A48 to M4 and additional development will only cause further chaos. There are also a few brownfields sites that are not considered why not? Taking over the green space in these Vale villages will change the character and attraction of these rural communities. Development priorities should be placed where extending existing town and urban areas in my view. Thank you.

Attachments: None

6825 Support

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 460 Land adjoining The Spinney / Tir sy'n ffinio â The Spinney

Respondent: Mr Ian Fairweather [1225]

Agent: Boyer Planning

Summary:

Site 460 has not been allocated in the Deposit RLDP as 'The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area'. Whilst this is disputed and it is considered that the site should have progressed, it is important to highlight that of all the Candidate Sites within St Nicholas, The Spinney has the least issues raised.

Conservation Area - The development would have limited impact upon the Conservation Area. The majority of the site is already hidden from the A48 via mature vegetation and existing boundary features, and any proposed development would maintain this approach and minimise the visual appearance on the Conservation Area. Only part of the Candidate Site is located within the Conservation Area. Furthermore, the characteristics that give the Conservation Area its special interest, as identified in the Conservation Area Appraisal and Management Plan have been used as references for the design of the illustrative site layout.

Settlement Boundary - The current Settlement Boundary is illogical as the site is surrounded by development on 3 boundaries and the simple rounding off along the southern boundary would allow for an appropriate windfall infill development.

The site performs favourably in sustainability and deliverability terms, and that the matters previously cited as constraints are capable of mitigation through design.
A table comparing an updated site assessment prepared by Boyer against the Council's assessment has been provided.

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

Full text:

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

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

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

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

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

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

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

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

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

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

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As

drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to St Nicholas under Policy SP2 is not justified.

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

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

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

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

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

Policy SP6 should therefore be amended to increase the flexibility margin to up to 15%, with consequential allocation of additional small and medium-sized sites.
HG1: Housing Allocations Table 3 spatial distribution
Mr Fairweather does not comment on any of the proposed housing allocations, however, does highlight that the delivery in incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements. Only 161 units are proposed on smaller allocated sites, equating to approximately 7% of newly allocated supply.
In the context of the above, there remains significant concern that the spatial strategy continues to exclude allocations within Minor Rural Settlements, including St Nicholas.

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

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

This approach is inconsistent with the settlement's accessibility and functional role. St Nicholas is:
• Well connected to the A48 strategic highway network.

• Served by bus routes within close proximity to the site.
• Within commuting distance of Cardiff and Cowbridge.
• A sustainable and established residential community.

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

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

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

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

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

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

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

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

Conservation Area Impact
St Nicholas is described in the Conservation Area Appraisal and Management Plan as ‘a low density, linear village located on the A48’ and the candidate site is located towards the west of the village and lies partially within the current Conservation Area boundary. The Authority will be aware that the Conservation Area has been amended over the years to its current illogical designation regarding the Paddock area, similar to that of the Settlement Boundary.

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

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

Whilst only a part of the Candidate Site is located within the Conservation Area, it has to be seen in the context of an appropriate infill site that links the southern part of the village with the more modern suburban type of development at

Old Rectory Drive to the west. More significantly, the site provides an opportunity for a development to make a positive contribution to the character and appearance of the Conservation Area as well as respect or enhance the special architectural or historic interest.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7066 Support

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 486 Land to the South of the A48 at St Nicholas / Tir i'r de o'r A48 yn Sain Nicolas

Respondent: Barratt Redrow Homes [2669]

Agent: Highlight Planning

Summary:

Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area. A sustainable, mixed-tenure site at St Nicholas would assist in diversifying the supply portfolio and improving resilience.

A Heritage Appraisal concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner.
It is considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained.
There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern,

energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise

opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"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. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural

factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence,

the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery

assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability

evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable

allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency

across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."

That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.

Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.

However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.

We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.

Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be

applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.

Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part

Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.

Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.

There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.

The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.

Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Land at St Nicholas / omission from the Deposit Plan Position: Object to omission

Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.

The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.

Deposit Plan Conclusion

Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.

In particular:

• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;

• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;

• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;

• the Plan relies too heavily on key sites, rolled forward sites and windfalls;

• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and

• the omission of St Nicholas is not justified by the Council's own evidence base.

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.

For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.

Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site

Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7067 Comment

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 486 Land to the South of the A48 at St Nicholas / Tir i'r de o'r A48 yn Sain Nicolas

Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

We comment on the Council's Summary of Assessment as follows:
Developer Interest – should be amended from red to green.
Historic Environment – should be amended from red to green.
Special Landscape Area and Glamorgan Heritage Coast Designations – should be amended from red to green.
Environmental & Physical Constraints Conclusions – should be amended from red to green.
Access/proximity to services and facilities conclusions – should be amended from amber to green.
Connectivity and Capacity – should be amended from red to green.
Climate Change – should be amended from red to green.
Placemaking Character and Place – should be amended from red to green.
Suitable for Further Consideration – should be amended from red to green.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of

onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider

employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"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. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP

on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply

base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest

needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites

suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to

provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain

cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;

• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO_2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.

Suitability for Allocation and Key Benefits

For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW.

In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.

The proposed development of the site would deliver the following key benefits:

• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;

• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

5031 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Mr Paul Waite [3089]

Summary:

I object to Site 490 Land to the north of Pendoylan due to the sheer size and the consequences of potentially doubling the size of a rural community. I ask the council whether the size of this proposal meets all environmental and rural objectives to protect our habitat.

I would not object to a proposed site in proportion to progressive growth of a rural village, but this is just too large!

Full text:

I object to Site 490 Land to the north of Pendoylan due to the sheer size and the consequences of potentially doubling the size of a rural community. I ask the council whether the size of this proposal meets all environmental and rual objectives to protect our habitat.

I would not object to a proposed site in proportion to progressive growth of a rural village, but this is just too large!

Attachments: None

5034 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Hannah Elward [3090]

Summary:

The site is already highly contested and local infrastructure is overstretched, with existing congestion and limited capacity in roads, schools and healthcare. The proposal includes Green Belt land, undermining its purpose to prevent urban sprawl and protect the countryside. The adjacent historic village, established for hundreds of years, would suffer irreversible harm to its character and setting. Access is inadequate and increased traffic would urbanise and damage this picturesque rural area. This location is unsuitable and should not be allocated for development.

Full text:

1. Significant Existing Local Opposition
This site is already highly contested. Proceeding with inclusion despite strong and sustained community opposition demonstrates a disregard for local residents and the principles of meaningful public consultation.

2. Impact on Overstretched Infrastructure
Local infrastructure is already under considerable strain. Roads around the motorway junction experience congestion, particularly at peak times. Additional development would exacerbate traffic pressures, increase pollution, and heighten safety risks. There is no clear evidence that supporting infrastructure—roads, schools, healthcare, drainage, and utilities—can accommodate further demand without significant and disruptive upgrades.

3. Loss of Green Belt Land
The proposal includes designated Green Belt land. The purpose of Green Belt policy is to prevent urban sprawl, safeguard the countryside from encroachment, and preserve the setting of historic settlements. Development in this location directly undermines these objectives. There are no demonstrated “exceptional circumstances” that justify such loss.

4. Harm to a Historic and Picturesque Village
The adjacent village has been established for hundreds of years and retains a distinct rural character. Its historic setting, landscape views, and identity would be irreparably harmed by large-scale development at its boundary. Once lost, this character cannot be restored.

5. Inadequate Access and Unsuitable Location
The village itself lacks suitable access to accommodate the scale of development proposed. The surrounding road network was never designed for significant expansion. Increased traffic would fundamentally alter the quiet, rural nature of the area.

6. Environmental and Landscape Impact
The site forms part of a valued landscape that contributes to the character and amenity of the area. Development at a motorway junction in such a sensitive rural setting would introduce urbanisation, noise, light pollution, and visual intrusion.

For the reasons outlined above, this site is neither sustainable nor appropriate for allocation. I strongly urge the Council to reject its inclusion and instead prioritise brownfield sites or more suitable locations that do not compromise Green Belt land, historic villages, or already pressured infrastructure.

Attachments: None

5036 Support

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Mrs Kate James [3092]

Summary:

Would be fantastic to see new development in pendoylan

Full text:

Would be fantastic to see new development in pendoylan

Attachments: None

5051 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Mr Rhodri Hanmer [3098]

Summary:

Having looked into planning details in great detail for the proposed road, I would suggest before considering this site that the Council consider.
-The village in a Conservation area and there is policy and planning protection provided, including the views in and out of the area.

-The Ely Valley is a Site of Special Scientific Interest with protection provided for the area.

-From a traffic and environmental reason, brown field sites and sites along regular transit routes should be considered first..

These aspects were not considered for the road and a huge amount of money was spent.

Full text:

Having looked into planning details in great detail for the proposed road, I would suggest before considering this site that the Council consider the fact the village is in a Conservation area and there is a huge amount of protection provided in policy for the area, and importantly in this case, the views in and out of the area.

From the Conservation Area Appraisal for Pendoylan
(http://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Conservation/Appraisals/Pendoylan_CA_AMP_2009.pdf)
"The Council will seek to ensure that all development respects the important views within, into and from the Conservation Area, as identified in the appraisal. The Council will seek to ensure that these views remain protected from inappropriate forms of development."

Secondly, The Ely Valley is a Site of Special Scientific Interest (SSSI) so there is a huge amount of protection provided here for the area.
"The Ely Valley and ridge slopes are designated by the Vale of Glamorgan Council as a Special Landscape Area (SLA): Within the special landscape areas identified above, development proposals will be permitted where it is demonstrated they would cause no unacceptable harm to the important landscape character of the area". (Policy MG 17, Vale of Glamorgan LDP (2011-2026)).

These aspects were not considered for the road and therefore a huge amount of money was spent, and these aspects would have likely halted the road development.

I am happy to provide further detail if required:

Finally, I would hope from a traffic and environmental reason, the council would consider firstly brown field sites, and secondly prioritise sites along regular bus and train routes rather than country roads.

Attachments: None

5056 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Mrs Marilyn Roe [3103]

Summary:

Rural and farming community.
The infrastructure of only one road namely Pendoylan Road cannot cope with the volume of traffic passing through Clawdd Coch, Tredoridge and Pendoylan village. It is currently a 'rat run' for all commercial and non residents cutting through from Llantrisant (A4119?) and M4 to the A48. A bypass is needed.

Full text:

Site ID 490
Rural and farming community.
The infrastructure of only one road namely Pendoylan Road cannot cope with the volume of traffic passing through Clawdd Coch, Tredoridge and Pendoylan village. It is currently a 'rat run' for all commercial and non residents cutting through from Llantrisant (4119 ?) and M4 to the A48
A by pass is needed.

Attachments: None

5057 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Mrs Glynis Lloyd [3104]

Summary:

The Ely Valley at Pendoylan is now flooding on a regular basis with flood water frequently covering the land in question. The land around the village cannot absorb any more run off caused by new buildings or hard landscaping

Full text:

The Ely Valley at Pendoylan is now flooding on a regular basis with flood water frequently covering the land in question. The land around the village cannot absorb any more run off caused by new buildings or hard landscaping

Attachments: None

5058 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Ms Norma Greene [3106]

Summary:

I believe developing this agricultural land would harm Pendoylan and its residents, who value the village’s small size and rural setting. The village lacks amenities and has limited public transport, so extra housing would increase traffic on already busy country lanes. The land surrounds the primary school, and development could prevent school expansion and reduce places for local children, leading to increased travel distances.

Full text:

I believe that any development of this agricultural land would be detrimental to the village of Pendoylan and the residents who have chosen to live in a small village in outstanding countryside because it is small. There are no amenities in the village such as shops, very limited public transport so any additional housing would increase the already over saturated country lanes with additional traffic. The area indicated totally surrounds the village primary school and any development on the land would affect the children at the school. The school would not be able to expand if needed and if the land was used for housing it would be doubtful if there would be any places available for children to attend the school, hence more travel.

Attachments: None

5088 Comment

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Joanna Huddart [3122]

Summary:

Land borders the Ely flood plain
If built on drainage shall decrease increasing flood risk as well as from flood plain
Very few essential services available in area especially public transport therefore road traffic shall increase along a busy road . Gas and mains sewage not available for a lot of village currently. Shall decrease available green space that council says is important for wellbeing
Maybe one suggestion for the land is to build a car park for parents at the school to ease congestion at school times

Full text:

Land borders the Ely flood plain
If built on drainage shall decrease increasing flood risk as well as from flood plain
Very few essential services available in area especially public transport therefore road traffic shall increase along a busy road . Gas and mains sewage not available for a lot of village currently. Shall decrease available green space that council says is important for wellbeing
Maybe one suggestion for the land is to build a car park for parents at the school to ease congestion at school times

Attachments: None

5333 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Mr David Metcalf [3234]

Summary:

The land earmarked to the North of the Pendoylan school is outside of the village boundary with no nearby houses. It is greenfield land and should be left as such. The area around the school is already heavily congested and should be left as such.

Full text:

The land earmarked to the North of the Pendoylan school is outside of the village boundary with no nearby houses. It is greenfield land and should be left as such. The area around the school is already heavily congested and should be left as such.

Attachments: None

5521 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Mr William Wigley [3284]

Summary:

Existing agricultural land use and total lack of suitable infrastructure for housing development.

Full text:

Existing agricultural land use and total lack of suitable infrastructure for housing development.

Attachments: None

6198 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 490 Land to the north of Pendoylan / Tir i'r gogledd o Bendeulwyn

Respondent: Mrs Laura Williams [3491]

Summary:

I understand that the site is not suitable for new housing as it is BMV land, and the Local Planning Authority (LPA) is advised to prioritise brownfield and lower-quality agricultural land. Pendoylan has limited services, and residents depend on private transport for essentials. New development should be in sustainable, well-connected locations prioritising active travel and reducing car reliance. Major development in Pendoylan would conflict with national planning policies, and new homes should be situated where existing or potential services, active travel, and access to employment are available.

Full text:

As concluded in the RLDP Stage 2 Candidate Site Register, this site is not a sustainable or suitable location for new housing development. It reports that the land is BMV land (in part Grade 2). PPW expects LPAs to avoid allocating BMV land for development and take sequential approach to site allocation so that brownfield and lower-quality agricultural land is preferred to BMV land. Fundamentally, the VOGC has also previously, accurately concluded that Pendoylan, as a settlement, contains few services (only a primary school, and Church) and residents rely on private transport to access all other essential services and facilities. PPW requires that all new development is located in sustainable, well-connected places and designed to priortise active travel, reducing the reliance on private cars. Clearly any new, major development in Pendoylan would conflict with national planning policy. Whilst it is acknowledged that there is a need for new homes in the VoGC, not least affordable homes, this should be located in, or on the edge of, those settlements that have or could sustain the essential services and facilities, active travel and good access to jobs, that any new residents demand.

Attachments: None

5641 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 549 Land at Peterston Super Ely, Option 2 / Tir yn Llanbedr-y-fro, Opsiwn 2

Respondent: Kirsten Tedder [3091]

Summary:

This piece of land is in the flood plain for the river Ely which has flooded regularly every year in recent history. Building in this area would undoubtedly mean the river has no option than to flood further back across the main road through the village as well as Wyndham Park way.

Land being considered for development in Peterston Super Ely is far too big an area in proportion to the size of the village itself with limited lane access and would ruin the character of the rural Vale.

Please stop building houses on green fields especially in flood area.

Full text:

This piece of land is in the flood plain for the river Ely which has flooded regularly every year in recent history. Building in this area would undoubtedly mean the river has no option than to flood further back across the main road through the village as well as Wyndham Park way.

Land being considered for development in Peterston Super Ely is far too big an area in proportion to the size of the village itself with limited lane access and would ruin the character of the rural Vale.

Please stop building houses on green fields especially in flood area.

Attachments: None

5741 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 3836 Land at Culverhouse Cross /Tir yng Nghroes Cwrlwys

Respondent: Mrs Bethan Britton [3346]

Summary:

Do not have the infrastructure the roads are already constantly busy. Don’t have the public transport links

Full text:

Do not have the infrastructure the roads are already constantly busy. Don’t have the public transport links

Attachments: None

5038 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 3854 Land at Bonvilston /Tir yn Nhresimwn

Respondent: Mrs Helen Kingman [3093]

Summary:

The Vale rural communities not only preserve our cultural heritage but provide a ‘green lung’ in the face of ever increasing development. Peterston super Ely where I have lived for 22 years already suffers from lane traffic issues and has managed to keep its strong community character due to its unique rural setting appreciated by its residents. It is also a thriving area for wildlife and birds and a regular site for ramblers. Housing developments need to be on brown sites and the vale’s green rural communities need to be valued and preserved.

Full text:

The Vale rural communities not only preserve our cultural heritage but provide a ‘green lung’ in the face of ever increasing development. Peterston super Ely where I have lived for 22 years already suffers from lane traffic issues and has managed to keep its strong community character due to its unique rural setting appreciated by its residents. It is also a thriving area for wildlife and birds and a regular site for ramblers. Housing developments need to be on brown sites and the vale’s green rural communities need to be valued and preserved.

Attachments: None

7150 Support

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 3857 Land South of the A48, Bonvilston /Tir i'r de o'r A48, Tresimwn

Respondent: Peter Stone Properties Ltd [1182]

Agent: Geraint John Planning Ltd

Summary:

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan.
Notwithstanding any potential allocation at Wick or Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.
In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site’s classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.
There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.
There are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

It is considered that the site represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardi, which comprise all key services.
Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.
To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Full text:

ANNEX 1
Preface

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

The representations are structured into the following sections:

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

SECTION 1. Response to the Deposit Plan

Distribution of Growth

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

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

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

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

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

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

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

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

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet

this objective, nor are its provisions and allocations adequate.

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

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

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

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

Housing Supply

RLDP Allocations - Key Sites

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

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

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

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

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months

• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

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

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

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

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

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

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

Windfall Sites

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

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

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

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

St Athan Train Station

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

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

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

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

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

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

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

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

Rolled forward LDP Sites

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

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

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

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should

be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

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

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

Housing Delivery Rate Assumptions

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

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

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

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

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

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

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

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the

first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

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

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

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

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area

(which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

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

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

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

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

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

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

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

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

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

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

Deliverability of the Site

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

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

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

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

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

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

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's

assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.
Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.
The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order

to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

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

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

Preface

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

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

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

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

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

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

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

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

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

Timing Assumptions underpinning the Trajectory

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

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

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

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

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

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

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

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

Housing Delivery Rate Assumptions

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

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

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

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how

this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

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

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

Status & Standing of Sites included in the Trajectory

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

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required

that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

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

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

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

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

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

Key Sites

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

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

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

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

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

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

St Athan Train Station

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

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

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

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust"

and “unsound”.

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

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

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

“A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth.”

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the ‘Rectory Field, St Brides Road’ site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

‘Land West of Maendy Road’ has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the ‘Candidate Assessment at Preferred Strategy Stage’ (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the “soundness” of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;

• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

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

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

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

5037 Object

Document Element: EAST VALE (PETERSTON-SUPER-ELY & WENVOE) / DWYRAIN Y FRO (LLANBEDR A GWENFÔ), 4073 Land North East of Primary School, Peterston Super Ely/Tir gogledd/ddwyrain or ysgol gynradd, Llanbedry-fro

Respondent: Mrs Helen Kingman [3093]

Summary:

The Vale rural communities not only preserve our cultural heritage but provide a 'green lung' in the face of ever increasing development. Peterston super Ely where I have lived for 22 years already suffers from lane traffic issues and has managed to keep its strong community character due to its unique rural setting appreciated by its residents. It is also a thriving area for wildlife and birds and a regular site for ramblers. Housing developments need to be on brown sites and the vale's green rural communities need to be valued and preserved.

Full text:

The Vale rural communities not only preserve our cultural heritage but provide a 'green lung' in the face of ever increasing development. Peterston super Ely where I have lived for 22 years already suffers from lane traffic issues and has managed to keep its strong community character due to its unique rural setting appreciated by its residents. It is also a thriving area for wildlife and birds and a regular site for ramblers. Housing developments need to be on brown sites and the vale's green rural communities need to be valued and preserved.

Attachments: None

4520 Support

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 353 Land on the West Side of Cardiff Road, Dinas Powis / Tir ar ochr orllewinol Cardiff Road, Dinas Powys

Respondent: Mr Karl Watkins [2830]

Summary:

Perfect

Full text:

Perfect

Attachments: None

6199 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 353 Land on the West Side of Cardiff Road, Dinas Powis / Tir ar ochr orllewinol Cardiff Road, Dinas Powys

Respondent: Mrs Kathryn Baines [3493]

Summary:

The site is not suitable for multiple reasons
Flood risk
Damage to wildlife , areas locally already developed have not had the protection that was promised eg dormice habitat destroyed at Scholars Park with no provision as planned
Area is already choc a bloc with traffic, Cardiff Rd can't take anymore cars
Expanding population, no provision of extra school places or extra medical places planned
Continued erosion of green space that is already seriously depleted

Full text:

The site is not suitable for multiple reasons
Flood risk
Damage to wildlife , areas locally already developed have not had the protection that was promised eg dormice habitat destroyed at Scholars Park with no provision as planned
Area is already choc a bloc with traffic, Cardiff Rd can't take anymore cars
Expanding population, no provision of extra school places or extra medical places planned
Continued erosion of green space that is already seriously depleted

Attachments: None

6432 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 353 Land on the West Side of Cardiff Road, Dinas Powis / Tir ar ochr orllewinol Cardiff Road, Dinas Powys

Respondent: Chirag Metha [2123]

Summary:

strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.

Conclusion

The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.

Approving these sites would result in:

• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment

For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.

Full text:

I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.

Conclusion

The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.

Approving these sites would result in:

• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment

For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.

Attachments: None

6437 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 353 Land on the West Side of Cardiff Road, Dinas Powis / Tir ar ochr orllewinol Cardiff Road, Dinas Powys

Respondent: Mrs Sweta Mehta [2120]

Summary:

Previously Rejected Candidate Sites
I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.
Conclusion
The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.
Approving these sites would result in:
• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment
For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.
I trust that these concerns will be fully considered as part of the consultation process

Full text:

Previously Rejected Candidate Sites
I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.
Conclusion
The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.
Approving these sites would result in:
• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment
For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.
I trust that these concerns will be fully considered as part of the consultation process

Attachments: None

4532 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 354 Brynawel Garden Centre / Canolfan Arddio Brynawel

Respondent: Mr Leon Duke [2841]

Summary:

Garden centre was a fundamental pillar of the community in the heart of the countryside, it shouldn't have been sold to buyers with every intention of replacing it for housing.

Infrastructure no sufficient to accommodate multiple homes in the area.

Full text:

Garden centre was a fundamental pillar of the community in the heart of the countryside, it shouldn't have been sold to buyers with every intention of replacing it for housing.

Infrastructure no sufficient to accommodate multiple homes in the area.

Attachments: None

4556 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 354 Brynawel Garden Centre / Canolfan Arddio Brynawel

Respondent: Mr Rob Sydenham [2862]

Summary:

Not more houses in the country side !! Not acceptable.

Full text:

Not more houses in the country side !! Not acceptable.

Attachments: None

5554 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 354 Brynawel Garden Centre / Canolfan Arddio Brynawel

Respondent: Mr Corrado Ruta [2774]

Summary:

I oppose the development of this site for housing because it conflicts with key RLDP objectives, including climate change mitigation, health and well-being, and promoting sustainable travel, due to inadequate public transport and active travel infrastructure. Additionally, the site's location in a natural, tranquil, heritage rural setting used by hikers and horse riders means the development would harm the environment and local character.

Full text:

I oppose the development of this site for housing because it conflicts with key RLDP objectives, including climate change mitigation, health and well-being, and promoting sustainable travel, due to inadequate public transport and active travel infrastructure. Additionally, the site's location in a natural, tranquil, heritage rural setting used by hikers and horse riders means the development would harm the environment and local character.

Attachments: None

6055 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 354 Brynawel Garden Centre / Canolfan Arddio Brynawel

Respondent: Miss Ceri Baines [3461]

Summary:

Sully Road has been completely overwhelmed with traffic. It's impossible to get out of the road at rush hour. Access along the whole road is also poor especially in this area, verging on dangerous with the speed of traffic. Wildlife is also a real concern. We run a hedgehog rescue and continue to see a chronic decline in the Vale after significant habitat loss. There are many release sites near this area, it is a vital spot to make sure wildlife thrives.

Full text:

Sully Road has been completely overwhelmed with traffic. It's impossible to get out of the road at rush hour. Access along the whole road is also poor especially in this area, verging on dangerous with the speed of traffic. Wildlife is also a real concern. We run a hedgehog rescue and continue to see a chronic decline in the Vale after significant habitat loss. There are many release sites near this area, it is a vital spot to make sure wildlife thrives.

Attachments: None

4741 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 356 Land east of Pen-Y-Turnpike Road, Dinas Powys, / Tir i'r dwyrain o Pen-Y-Turnpike Road, Dinas Powys

Respondent: Mrs Sarah Magee [2908]

Summary:

Traffic in and around Penyturnpike & Dinas in general is horrific. These are beautiful fields surrounding our village. Please do not allow development on these fields

Full text:

Traffic in and around Penyturnpike & Dinas in general is horrific. These are beautiful fields surrounding our village. Please do not allow development on these fields

Attachments: None

4743 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 356 Land east of Pen-Y-Turnpike Road, Dinas Powys, / Tir i'r dwyrain o Pen-Y-Turnpike Road, Dinas Powys

Respondent: Dr Camilla Phillips [2910]

Summary:

Building on this land would destroy valuable wildlife habitat and strain existing systems that are not designed for increased demand. The power supply, sewage, and water systems are already under stress, with recent failures and the need for major upgrades. Pen y Turnpike Road is narrow, poorly maintained, and unsafe for heavier traffic, which would increase with new housing, causing accidents and pollution. I believe all infrastructure issues must be fully addressed before approval and request evidence that alternative brownfield sites have been considered, rather than prioritising greenfield development for profit.

Full text:

Building on this land will not only destroy a habitat that is abundant in wildlife that can never be restored, but it will also put pressure on many man made systems that through lack of foresight, poor planning and poor maintenance/management would be unable to cope with an increased number of houses, residents and cars. Firstly, the power supply. Even with updated transformers the supply to the area and Dinas powys as a whole regularly cuts out due to demand, more houses without significant investment on a wide scale would cause more outages. The sewage system and water supply that goes up and down pen y turnpike hill into the village was never built to service as many houses as it does now (evidenced by a major burst of a water pipe at the base of the hill last year), building more houses would require a complete overhaul of the entire sewage and water supply system. Pen y turnpike road itself is a country lane not meant for the amount of traffic it currently has. It is not maintained with uneven road surfaces, narrowings (that can't be changed, nor would I want them to be), rarely salted in the winter months, pot holes that are poorly patched and so reopen constantly during wet and cold weather causing tyre blowouts on a regular basis, the bottom of the road that turns out right onto leckwith road is an unsafe hairpin turn onto a blind bend and the cause of many an accident every year… an increase of cars needing to use this road and the amount of heavy goods vehicles that would have to be driven along it to build any number of houses would be unsustainable and cause a huge number of problems, not withstanding the traffic jams that would be caused which would increase the pollution in the area. If I was to ignore the blatant lack of care and respect shown to the flora and fauna of the local environment (that should be allowed to thrive by itself and contributes to the health and wellbeing of the local population) by the planning of its destruction for profit, I would suggest that it would only be basic logic and sensible planning that all of the other factors must be proven to be adequately invested in, improved and/or resolved before any planning be approved, not approving planning with "assurances that these issues will be addressed". I would also like evidence that there are no other brown field sites that would work just as well, albeit more complicated and at a slightly higher expense - I would trust that the building of houses on a green field site to the objection of almost everyone would not be approved simply for a matter of ease and profit.

Attachments: None

5557 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 356 Land east of Pen-Y-Turnpike Road, Dinas Powys, / Tir i'r dwyrain o Pen-Y-Turnpike Road, Dinas Powys

Respondent: Mr Corrado Ruta [2774]

Summary:

I oppose developing this site for housing as it conflicts with key RLDP objectives, including climate change mitigation, health and well-being, and promoting sustainable travel, due to inadequate public transport and active travel infrastructure. Previous developments in nearby areas have increased traffic without corresponding improvements in transport. I believe significant enhancements should be made before any new housing is approved. Additionally, the site's location in a natural, tranquil, heritage rural area crossed by a public right of way makes development inappropriate and detrimental to the environment and local character.

Full text:

I strongly object to development of this site for housing as it goes against some key objectives of the RLDP. I object because it goes against "Objective 1 - Mitigating and Adapting to Climate Change" and "Objective 2 - Improving Mental and Physical Health and Well-being" and "Objective 8 - Promoting Active and Sustainable Travel Choices" because the area hasn't got adequate public transport nor active travel infrastructure, so all new residents will be forced to move by car for virtually any needs. The recent housing developments in Dinas, Barry and Sully have already created enormous traffic pressure on the poor road network and were not accompanied by any improvement in public transport nor active travel infrastructure. Significant improvements in public transport and active travel infrastructure should be planned and undertaken prior to any further housing development. I object as the proposed use goes against the RLDP Objective 5 – Protecting and Enhancing the Natural Environment, Objective 4 – Placemaking and Objective 2 - Improving Mental and Physical Health and Well-being. The site is located in an area of natural beauty and tranquillity, heritage rural setting and crossed by a public right of way for local walkers.

Attachments: None

5839 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 356 Land east of Pen-Y-Turnpike Road, Dinas Powys, / Tir i'r dwyrain o Pen-Y-Turnpike Road, Dinas Powys

Respondent: Mr Simon Tomlinson [3396]

Summary:

Poor choice for housing. No travel access. Significant flooding risk. Ruining village of Dinas powys.

Full text:

Poor choice for housing. No travel access. Significant flooding risk. Ruining village of Dinas powys.

Attachments: None

5832 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 368 Former Cogan Reservoir Site / Hen Safle Cronfa Ddŵr Cogan

Respondent: Mrs Helen Kant [3392]

Summary:

This piece of land is only accessed via a single track road which could not be widened due to existing housing.

Full text:

This piece of land is only accessed via a single track road which could not be widened due to existing housing.

Attachments: None

6433 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 368 Former Cogan Reservoir Site / Hen Safle Cronfa Ddŵr Cogan

Respondent: Chirag Metha [2123]

Summary:

strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.

Conclusion

The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.

Approving these sites would result in:

• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment

For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.

Full text:

strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.

Conclusion

The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.

Approving these sites would result in:

• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment

For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3f6

6438 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 368 Former Cogan Reservoir Site / Hen Safle Cronfa Ddŵr Cogan

Respondent: Mrs Sweta Mehta [2120]

Summary:

Previously Rejected Candidate Sites
I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.
Conclusion
The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.
Approving these sites would result in:
• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment
For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.
I trust that these concerns will be fully considered as part of the consultation process

Full text:

Previously Rejected Candidate Sites
I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.
Conclusion
The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.
Approving these sites would result in:
• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment
For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.
I trust that these concerns will be fully considered as part of the consultation process

Attachments:

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

4722 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 369 Land South of Cross Common Road, Dinas Powys / Tir i'r de o Cross Common Road, Dinas Powys

Respondent: Mr Luke Bellamy [2298]

Summary:

Flooding risk.

Full text:

Flooding risk.

Attachments: None

5553 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 369 Land South of Cross Common Road, Dinas Powys / Tir i'r de o Cross Common Road, Dinas Powys

Respondent: Mr Corrado Ruta [2774]

Summary:

I oppose the development of this site for housing because it conflicts with key RLDP objectives, including climate change mitigation, health and well-being, and promoting sustainable travel, due to inadequate public transport and active travel infrastructure. Past developments have increased traffic without improving infrastructure. I believe significant improvements should be made first. Additionally, the site's location in a natural, tranquil, heritage rural setting crossed by a public right of way means the development would harm the environment and local character.

Full text:

I strongly object to development of this site for housing as it goes against some key objectives of the RLDP. I object because it goes against "Objective 1 - Mitigating and Adapting to Climate Change" and "Objective 2 - Improving Mental and Physical Health and Well-being" and "Objective 8 - Promoting Active and Sustainable Travel Choices" because the area hasn't got adequate public transport nor active travel infrastructure, so all new residents will be forced to move by car for virtually any needs. The recent housing developments in Dinas, Barry and Sully have already created enormous traffic pressure on the poor road network and were not accompanied by any improvement in public transport nor active travel infrastructure. Significant improvements in public transport and active travel infrastructure should be planned and undertaken prior to any further housing development.
I object as the proposed use goes against the RLDP Objective 5 – Protecting and Enhancing the Natural Environment, Objective 4 – Placemaking and Objective 2 - Improving Mental and Physical Health and Well-being. The site is located in an area of natural beauty and tranquillity, heritage rural setting and crossed by a public right of way for local walkers.

Attachments: None

6201 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 369 Land South of Cross Common Road, Dinas Powys / Tir i'r de o Cross Common Road, Dinas Powys

Respondent: Mrs Kathryn Baines [3493]

Summary:

This area is not suitable for housing development
The roads around are too narrow and over used
There is no forward planning to make adequate provision for increasing population eg school or medical places
There is absolutely no public transport to support this area adequately

Full text:

This area is not suitable for housing development
The roads around are too narrow and over used
There is no forward planning to make adequate provision for increasing population eg school or medical places
There is absolutely no public transport to support this area adequately

Attachments: None

4534 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 376 Land West of Swanbridge Road (Phase 3), Sully / Tir i'r gorllewin o Swanbridge Road (Cam 3), Sili

Respondent: Mr Leon Duke [2841]

Summary:

This is heritage coastline and should not be considered for housing.

Zero infrastructure to accommodate multiple homes! Sort roads, schooling and shopping facilities before considering more residential housing!

Full text:

This is heritage coastline and should not be considered for housing.

Zero infrastructure to accommodate multiple homes! Sort roads, schooling and shopping facilities before considering more residential housing!

Attachments: None

4652 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 376 Land West of Swanbridge Road (Phase 3), Sully / Tir i'r gorllewin o Swanbridge Road (Cam 3), Sili

Respondent: Mrs Alison Maher [2426]

Summary:

There are not enough transport services, school places, or doctors surgery to accomodate this. It is not possible to achieve biodiversity net gain with this development.

Full text:

There are not enough transport services, school places, or doctors surgery to accomodate this. It is not possible to achieve biodiversity net gain with this development.

Attachments: None

5531 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 376 Land West of Swanbridge Road (Phase 3), Sully / Tir i'r gorllewin o Swanbridge Road (Cam 3), Sili

Respondent: Mr Corrado Ruta [2774]

Summary:

I strongly oppose this site development for housing, as it conflicts with key RLDP objectives. It undermines efforts to mitigate climate change, improve health and well-being, and promote sustainable travel, given Sully's lack of public transport and active travel infrastructure. The existing Phase 1 housing has increased traffic without infrastructure improvements, and a Phase 2 and potential Phase 3 would worsen this. Additionally, it worsens placemaking by adding housing to a village already lacking sufficient retail, health, education, and community facilities.

Full text:

I strongly object to development of this site for housing as it goes against some key objectives of the RLDP.
I object because it goes against "Objective 1 - Mitigating and Adapting to Climate Change" and "Objective 2 - Improving Mental and Physical Health and Well-being" and "Objective 8 - Promoting Active and Sustainable Travel Choices" because Sully hasn't got decent public transport nor active travel infrastructure, so all new residents will be forced to move by car for virtually any needs. The Taylor Wimpey housing Phase 1 has already created enormous traffic pressure on the poor road network and was not accompanied by any improvement in public transport nor active travel infrastructure; a Phase 2 will soon be built, an additional Phase 3 would be really catastrophic for Sully residents. not a single cycling path is present in Sully and Swanbridge Road does not have even a footway!
I object because it goes against Objective 4 – Placemaking because it adds more housing to a village like Sully that has already a disproportionate housing extent with shocking insufficiency of retail, health, education, training, cultural, social, recreation, and community facilities and spaces.

Attachments: None

5614 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 376 Land West of Swanbridge Road (Phase 3), Sully / Tir i'r gorllewin o Swanbridge Road (Cam 3), Sili

Respondent: Mrs Kaarina Ruta [845]

Summary:

I believe continuing with a third phase of development in Sully would be disastrous for the village and reckless by the Council. The current Phase 1 and 2 developments have already strained transport, education, and leisure services. Such expansion contradicts the RLDP, its sustainability and health guidance, and the Vale of Glamorgan Wellbeing Plan, which promote a greener, healthier, and more connected community. The area lacks proper public transport and active travel links, and existing infrastructure cannot support more residents without significant improvements. Development should only proceed when sustainable transport and infrastructure are in place.

Full text:

To propose to continue building in Sully with a third phase would be catastrophic for the village and quite frankly reckless from the Council. Already the current situation with Phase 1 and 2 of the Taylor Wimpey development is untenable and has created pressure on the already poor transport, school and leisure infrastructure. The first thing to note is that allowing a third phase would be contrary to the RLDP itself and in particular contrary to its integrated sustainability appraisal and the draft healthy placemaking supplementary planning guidance and hence national legislation and guidance too, which it supposedly aligns with. It is also contrary to the Vale of Glamorgan Wellbeing Plan 2023-2028 and its three key objectives of 'a more resilient and greener Vale', 'a more active and healthier Vale' and 'a more equitable and connected Vale'.

To continue building in Sully goes against in particular, "Objective 1 - Mitigating and Adapting to Climate Change", "Objective 2 - Improving Mental and Physical Health and Well-being" and "Objective 8 - Promoting Active and Sustainable Travel Choices" of the RLDP. Sully does lacks public transport options and does not have links to active travel networks. The proposed footpath and cycle path along Swanbridge Road and along Cog Road have not been built, as was promised. People who have moved into the new development are totally relying on private cars to go anywhere. The current new development is not even well connected with the existing village. One of the only walking paths connecting the new estate to the older part does not have accessible access for wheelchair users or people with pushchairs. The current road network is not coping with the current traffic flows, so how can it accommodate more housing, if public transport and active travel infrastructure is not improved first. New development should only be allowed where the infrastructure is in place to allow for people moving in to create sustainable habits of walking, wheeling, cycling and connecting to public transport and not locking them into private car use.

Attachments: None

6889 Support

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 376 Land West of Swanbridge Road (Phase 3), Sully / Tir i'r gorllewin o Swanbridge Road (Cam 3), Sili

Respondent: Taylor Wimpey [386]

Agent: Savills

Summary:

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 then sites that the Deposit RLDP proposes to instead allocate.

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.

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.

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.

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 Backgropund 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 then 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 then 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 PWW 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 to 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 Pencoedtre 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 (≤800m) 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 Wimepy 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

5062 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 400 Land off Penlan Road, Llandough / Tir oddi ar Penlan Road, Llandochau

Respondent: Sarah Teagle [3110]

Summary:

The local road network is already at capacity. The site suffers from a lack of adequate travel infrastructure. This development will remain car-dependent, further exacerbating the congestion.
The proposed development of Site 400 (Penlan Hill) and the sites in and around Llandough would result in the irreversible destruction of the local Green Belt. Furthermore, I am concerned about the impact on local sites of woodland interest that provide essential ecological buffers and are vital for local biodiversity.
The cumulative impacts of sites around Dinas and Llandough represents an overdevelopment of the area and a burden on the community.

Full text:

I am writing to formally submit my objections regarding the proposed Local Development Plan (LDP) candidate sites in Llandough and Dinas Powys. Specifically, I am objecting to Site 444 (Eastbrook/Cardiff Road), Site 400 (Penlan Hill), and Site HG1 KS2.
My grounds for objection are outlined below:
1. Pressure on Local Infrastructure and Roads
The local road network, particularly the primary routes through Dinas Powys and Llandough, is already at absolute capacity. Increasing the volume of housing via sites such as 444 and HG1 KS2 will lead to further gridlock on the Cardiff Road. The existing infrastructure is insufficient to support the resulting increase in traffic, posing risks to both road safety and local air quality.
2. Lack of Sustainable Travel Options
Despite the proximity to existing settlements, these sites suffer from a lack of adequate travel infrastructure. Without significant improvements to public transport and safe pedestrian/cycle links, these developments will remain car-dependent, further exacerbating the congestion issues mentioned above.
3. Destruction of Green Belt and Woodland
The proposed development of Site 400 (Penlan Hill) and the sites in and around Llandough would result in the irreversible destruction of the local Green Belt. Furthermore, I am deeply concerned about the impact on local sites of woodland interest. These areas provide essential ecological buffers and are vital for local biodiversity; their removal for housing is environmentally unjustifiable.
4. Cumulative Impact
The inclusion of multiple sites, including the "small" section off Cardiff Road (Site 444) and the developments in Llandough, represents an over-development of the area. While I note that Site 429 (Pen-y-Turnpike Road) was not accepted, the remaining proposed sites still place an unsustainable burden on the community.
I trust that these points will be fully considered during the evaluation process.

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/skq

5133 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 400 Land off Penlan Road, Llandough / Tir oddi ar Penlan Road, Llandochau

Respondent: Dr Sara Collins [3139]

Summary:

Traffic levels are already too high, the result is poor air quality for residents in the area.

Full text:

Traffic levels are already too high, the result is poor air quality for residents in the area.

Attachments: None

6431 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 400 Land off Penlan Road, Llandough / Tir oddi ar Penlan Road, Llandochau

Respondent: Chirag Metha [2123]

Summary:

. Candidate Site 400 – Land off Penlan Road

Candidate Site 400 should not be taken forward for development for the following critical reasons:

Existing Road Safety and Congestion Issues
The site is located very close to the Merrie Harrier junction, which is already a known accident hotspot and congestion point. Additional residential development would place unsustainable pressure on this junction and surrounding road network.

Insufficient Local Infrastructure
Llandough already faces significant pressure on essential services. Local GP practices and schools are at or near capacity. There is no clear evidence within the Deposit Plan demonstrating how these services could realistically accommodate substantial population growth.

Public Transport Limitations
Public transport provision in the area remains limited and does not offer a viable alternative to car use for many residents. Without significant transport investment, additional development will inevitably lead to increased private vehicle usage.

Parking Pressures Near Llandough Hospital
Parking demand associated with Llandough Hospital already places heavy pressure on surrounding residential streets. Development of this site would further worsen parking congestion and negatively impact existing residents.

Flood Risk and Wildlife Impact
There are documented flood concerns in Llandough. Developing additional land will increase hard surfaces and drainage pressure, heightening flood risk. The loss of greenfield land will also damage local biodiversity and wildlife corridors.

Full text:

. Candidate Site 400 – Land off Penlan Road

Candidate Site 400 should not be taken forward for development for the following critical reasons:

Existing Road Safety and Congestion Issues
The site is located very close to the Merrie Harrier junction, which is already a known accident hotspot and congestion point. Additional residential development would place unsustainable pressure on this junction and surrounding road network.

Insufficient Local Infrastructure
Llandough already faces significant pressure on essential services. Local GP practices and schools are at or near capacity. There is no clear evidence within the Deposit Plan demonstrating how these services could realistically accommodate substantial population growth.

Public Transport Limitations
Public transport provision in the area remains limited and does not offer a viable alternative to car use for many residents. Without significant transport investment, additional development will inevitably lead to increased private vehicle usage.

Parking Pressures Near Llandough Hospital
Parking demand associated with Llandough Hospital already places heavy pressure on surrounding residential streets. Development of this site would further worsen parking congestion and negatively impact existing residents.

Flood Risk and Wildlife Impact
There are documented flood concerns in Llandough. Developing additional land will increase hard surfaces and drainage pressure, heightening flood risk. The loss of greenfield land will also damage local biodiversity and wildlife corridors.

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3f3

6436 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 400 Land off Penlan Road, Llandough / Tir oddi ar Penlan Road, Llandochau

Respondent: Mrs Sweta Mehta [2120]

Summary:

2. Candidate Site 400 – Land off Penlan Road
Candidate Site 400 should not be taken forward for development for the following critical reasons:
Existing Road Safety and Congestion Issues
The site is located very close to the Merrie Harrier junction, which is already a known accident hotspot and congestion point. Additional residential development would place unsustainable pressure on this junction and surrounding road network.
Insufficient Local Infrastructure
Llandough already faces significant pressure on essential services. Local GP practices and schools are at or near capacity. There is no clear evidence within the Deposit Plan demonstrating how these services could realistically accommodate substantial population growth.
Public Transport Limitations
Public transport provision in the area remains limited and does not offer a viable alternative to car use for many residents. Without significant transport investment, additional development will inevitably lead to increased private vehicle usage.
Parking Pressures Near Llandough Hospital
Parking demand associated with Llandough Hospital already places heavy pressure on surrounding residential streets. Development of this site would further worsen parking congestion and negatively impact existing residents.
Flood Risk and Wildlife Impact
There are documented flood concerns in Llandough. Developing additional land will increase hard surfaces and drainage pressure, heightening flood risk. The loss of greenfield land will also damage local biodiversity and wildlife corridors.

Full text:

2. Candidate Site 400 – Land off Penlan Road
Candidate Site 400 should not be taken forward for development for the following critical reasons:
Existing Road Safety and Congestion Issues
The site is located very close to the Merrie Harrier junction, which is already a known accident hotspot and congestion point. Additional residential development would place unsustainable pressure on this junction and surrounding road network.
Insufficient Local Infrastructure
Llandough already faces significant pressure on essential services. Local GP practices and schools are at or near capacity. There is no clear evidence within the Deposit Plan demonstrating how these services could realistically accommodate substantial population growth.
Public Transport Limitations
Public transport provision in the area remains limited and does not offer a viable alternative to car use for many residents. Without significant transport investment, additional development will inevitably lead to increased private vehicle usage.
Parking Pressures Near Llandough Hospital
Parking demand associated with Llandough Hospital already places heavy pressure on surrounding residential streets. Development of this site would further worsen parking congestion and negatively impact existing residents.
Flood Risk and Wildlife Impact
There are documented flood concerns in Llandough. Developing additional land will increase hard surfaces and drainage pressure, heightening flood risk. The loss of greenfield land will also damage local biodiversity and wildlife corridors.

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3f9

4742 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 419 Land at The Grange, Pen-Y-Turnpike Road, Dinas Powys / Tir yn The Grange, Pen-Y-Turnpike Road, Dinas Powys

Respondent: Mrs Beauly Graham [2909]

Summary:

The candidate site includes a number of oaks and other mature trees which is home to important wildlife including bats and owls. The site also contains important hedgerow supporting other wildlife in the area. This site is part of a property which has an agricultural covenant and therefore should not be built on for residential development purposes. Development here would take away a large amount of the little green space left in Dina Powys.

Full text:

The candidate site includes a number of oaks and other mature trees which is home to important wildlife including bats and owls. The site also contains important hedgerow supporting other wildlife in the area. This site is part of a property which has an agricultural covenant and therefore should not be built on for residential development purposes. Development here would take away a large amount of the little green space left in Dina Powys.

Attachments: None

4744 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 419 Land at The Grange, Pen-Y-Turnpike Road, Dinas Powys / Tir yn The Grange, Pen-Y-Turnpike Road, Dinas Powys

Respondent: Dr Camilla Phillips [2910]

Summary:

Building on this land would destroy a wildlife habitat that cannot be restored and strain existing man-made systems such as power, sewage, and water supply, which are already under pressure. The current infrastructure, including Pen y Turnpike Road, cannot support increased traffic, especially heavy goods vehicles, leading to safety issues and pollution. I believe all necessary investments and improvements should be proven before any planning approval, and I question why brownfield sites are not considered, as building on greenfield land prioritises profit over environmental and community wellbeing.

Full text:

Building on this land will not only destroy a habitat that is abundant in wildlife that can never be restored, but it will also put pressure on many man made systems that through lack of foresight, poor planning and poor maintenance/management would be unable to cope with an increased number of houses, residents and cars. Firstly, the power supply. Even with updated transformers the supply to the area and Dinas powys as a whole regularly cuts out due to demand, more houses without significant investment on a wide scale would cause more outages. The sewage system and water supply that goes up and down pen y turnpike hill into the village was never built to service as many houses as it does now (evidenced by a major burst of a water pipe at the base of the hill last year), building more houses would require a complete overhaul of the entire sewage and water supply system. Pen y turnpike road itself is a country lane not meant for the amount of traffic it currently has. It is not maintained with uneven road surfaces, narrowings (that can't be changed, nor would I want them to be), rarely salted in the winter months, pot holes that are poorly patched and so reopen constantly during wet and cold weather causing tyre blowouts on a regular basis, the bottom of the road that turns out right onto leckwith road is an unsafe hairpin turn onto a blind bend and the cause of many an accident every year… an increase of cars needing to use this road and the amount of heavy goods vehicles that would have to be driven along it to build any number of houses would be unsustainable and cause a huge number of problems, not withstanding the traffic jams that would be caused which would increase the pollution in the area. If I was to ignore the blatant lack of care and respect shown to the flora and fauna of the local environment (that should be allowed to thrive by itself and contributes to the health and wellbeing of the local population) by the planning of its destruction for profit, I would suggest that it would only be basic logic and sensible planning that all of the other factors must be proven to be adequately invested in, improved and/or resolved before any planning be approved, not approving planning with "assurances that these issues will be addressed". I would also like evidence that there are no other brown field sites that would work just as well, albeit more complicated and at a slightly higher expense - I would trust that the building of houses on a green field site to the objection of almost everyone would not be approved simply for a matter of ease and profit.

Attachments: None

4739 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 423 Land North Dinas Powys / Tir yn ngogledd Dinas Powys

Respondent: Mrs Debbie Totterdell [1547]

Summary:

Flooding

Full text:

Flooding

Attachments: None

4834 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 423 Land North Dinas Powys / Tir yn ngogledd Dinas Powys

Respondent: Mrs Amy Harding [2977]

Summary:

Increased traffic
Increased demands on local healthcare
Damage to environment/wildlife

Full text:

Increased traffic
Increased demands on local healthcare
Damage to environment/wildlife

Attachments: None

5840 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 423 Land North Dinas Powys / Tir yn ngogledd Dinas Powys

Respondent: Mr Simon Tomlinson [3396]

Summary:

No transport links. Massive flooding risk

Full text:

No transport links. Massive flooding risk

Attachments: None

5518 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 425 Land at St Andrews Quarry, Dinas Powys / Tir yn Chwarel Saint Andras, Dinas Powys

Respondent: Mr Corrado Ruta [2774]

Summary:

I object to the proposal to allocate this site to housing as it goes against key objectives of the RLDP: 2. Improving Mental and Physical Health and Well-being, and 4. Placemaking. It is an area of outstanding natural beauty and allowing housing there would significantly limit the opportunity to develop it in future to achieve those RLDP objectives. It should rather be preserved and taken over for public use to achieve those two objectives.

Full text:

I object to the proposal to allocate this site to housing as it goes against key objectives of the RLDP: 2. Improving Mental and Physical Health and Well-being, and 4. Placemaking. It is an area of outstanding natural beauty and allowing housing there would significantly limit the opportunity to develop it in future to achieve those RLDP objectives. It should rather be preserved and taken over for public use to achieve those two objectives.

Attachments: None

5560 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 428 Land at North East Barry / Tir yng ngogledd-ddwyrain y Barri

Respondent: Mr Corrado Ruta [2774]

Summary:

I oppose the development of this site for housing because it conflicts with key RLDP objectives, including mitigating climate change, improving health and well-being, and promoting sustainable travel. The area lacks adequate public transport and active travel infrastructure, forcing residents to rely on cars. Past developments have increased traffic without improving transportation. I believe significant infrastructure improvements should be made before any new housing. Additionally, the site's natural beauty, tranquillity, and heritage value are threatened, contradicting objectives to protect the environment and enhance placemaking.

Full text:

I strongly object to development of this site for housing as it goes against some key objectives of the RLDP. I object because it goes against "Objective 1 - Mitigating and Adapting to Climate Change" and "Objective 2 - Improving Mental and Physical Health and Well-being" and "Objective 8 - Promoting Active and Sustainable Travel Choices" because the area hasn't got adequate public transport nor active travel infrastructure, so all new residents will be forced to move by car for virtually any needs. The recent housing developments in Dinas, Barry and Sully have already created enormous traffic pressure on the poor road network and were not accompanied by any improvement in public transport nor active travel infrastructure. Significant improvements in public transport and active travel infrastructure should be planned and undertaken prior to any further housing development. I object as the proposed use goes against the RLDP Objective 5 – Protecting and Enhancing the Natural Environment, Objective 4 – Placemaking and Objective 2 - Improving Mental and Physical Health and Well-being. The site is located in an area of natural beauty and tranquillity, heritage rural setting and crossed by paths used by hikers and horse riders.

Attachments: None

4745 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 429 Land at Pen y Turnpike Road, NW of Llandough Hospital / Tir yn Pen y Turnpike Road, i'r gogledd-orllewin o Ysbyty Llandochau

Respondent: Dr Camilla Phillips [2910]

Summary:

Building on this land would destroy a vital wildlife habitat and strain local infrastructure. The power supply frequently outages due to demand; more houses would worsen this. The sewage and water systems are inadequate for current usage and would require complete upgrades. Pen y Turnpike Road is a narrow, poorly maintained country lane unsuitable for increased traffic, including heavy goods vehicles, which would cause accidents and pollution. I believe development should only proceed if all infrastructure issues are addressed and alternative brownfield sites are considered, not solely for profit.

Full text:

Building on this land will not only destroy a habitat that is abundant in wildlife that can never be restored, but it will also put pressure on many man made systems that through lack of foresight, poor planning and poor maintenance/management would be unable to cope with an increased number of houses, residents and cars. Firstly, the power supply. Even with updated transformers the supply to the area and Dinas powys as a whole regularly cuts out due to demand, more houses without significant investment on a wide scale would cause more outages. The sewage system and water supply that goes up and down pen y turnpike hill into the village was never built to service as many houses as it does now (evidenced by a major burst of a water pipe at the base of the hill last year), building more houses would require a complete overhaul of the entire sewage and water supply system. Pen y turnpike road itself is a country lane not meant for the amount of traffic it currently has. It is not maintained with uneven road surfaces, narrowings (that can't be changed, nor would I want them to be), rarely salted in the winter months, pot holes that are poorly patched and so reopen constantly during wet and cold weather causing tyre blowouts on a regular basis, the bottom of the road that turns out right onto leckwith road is an unsafe hairpin turn onto a blind bend and the cause of many an accident every year… an increase of cars needing to use this road and the amount of heavy goods vehicles that would have to be driven along it to build any number of houses would be unsustainable and cause a huge number of problems, not withstanding the traffic jams that would be caused which would increase the pollution in the area. If I was to ignore the blatant lack of care and respect shown to the flora and fauna of the local environment (that should be allowed to thrive by itself and contributes to the health and wellbeing of the local population) by the planning of its destruction for profit, I would suggest that it would only be basic logic and sensible planning that all of the other factors must be proven to be adequately invested in, improved and/or resolved before any planning be approved, not approving planning with "assurances that these issues will be addressed". I would also like evidence that there are no other brown field sites that would work just as well, albeit more complicated and at a slightly higher expense - I would trust that the building of houses on a green field site to the objection of almost everyone would not be approved simply for a matter of ease and profit.

Attachments: None

5134 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 429 Land at Pen y Turnpike Road, NW of Llandough Hospital / Tir yn Pen y Turnpike Road, i'r gogledd-orllewin o Ysbyty Llandochau

Respondent: Dr Sara Collins [3139]

Summary:

Traffic levels are already too high, leading to cars speeding along country roads gradually wearing the road edges away as they pass each other too fast. The road system is not fit for the existing traffic levels, there is a knock on effect in Dinas Powys as traffic attempts to make short cuts to Cardiff.

Full text:

Traffic levels are already too high, leading to cars speeding along country roads gradually wearing the road edges away as they pass each other too fast. The road system is not fit for the existing traffic levels, there is a knock on effect in Dinas Powys as traffic attempts to make short cuts to Cardiff.

Attachments: None

5834 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 429 Land at Pen y Turnpike Road, NW of Llandough Hospital / Tir yn Pen y Turnpike Road, i'r gogledd-orllewin o Ysbyty Llandochau

Respondent: Mrs Helen Kant [3392]

Summary:

This is an important green space in Llandough. This land is surrounded by ancient woodland including mature oaks and ash. The land is crisscrossed with public foot paths and a public right of way.
The Pen y Turn Pike Road is too narrow to serve additional housing; it would need to be widened.
If houses were built, residents would only be able to reach schools and other services by car as it is in a rural position and the area is not served by any bus route.

Full text:

This is an important green space in Llandough. This land is surrounded by ancient woodland including mature oaks and ash. The land is crisscrossed with public foot paths and a public right of way.
The Pen y Turn Pike Road is too narrow to serve additional housing; it would need to be widened.
If houses were built, residents would only be able to reach schools and other services by car as it is in a rural position and the area is not served by any bus route.

Attachments: None

6434 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 429 Land at Pen y Turnpike Road, NW of Llandough Hospital / Tir yn Pen y Turnpike Road, i'r gogledd-orllewin o Ysbyty Llandochau

Respondent: Chirag Metha [2123]

Summary:

strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.

Conclusion

The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.

Approving these sites would result in:

• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment

For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.

Full text:

strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.

Conclusion

The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.

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• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment

For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.

Attachments:

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

6439 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 429 Land at Pen y Turnpike Road, NW of Llandough Hospital / Tir yn Pen y Turnpike Road, i'r gogledd-orllewin o Ysbyty Llandochau

Respondent: Mrs Sweta Mehta [2120]

Summary:

Previously Rejected Candidate Sites
I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.
Conclusion
The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.
Approving these sites would result in:
• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment
For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.
I trust that these concerns will be fully considered as part of the consultation process

Full text:

Previously Rejected Candidate Sites
I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.
Conclusion
The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.
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• Loss of green buffer land between communities
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• Damage to local wildlife and the natural environment
For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.
I trust that these concerns will be fully considered as part of the consultation process

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4rj

4467 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 431 Land off Caerleon Road, Dinas Powys / Tir oddi ar Caerleon Road, Dinas Powys

Respondent: Mr Christopher Scutt [2798]

Summary:

Proposed land at Carlton Road. Additional Housing in this area will cause significant further traffic loading on the area and in particular the only road into and out of the area, Castle Drive. This road has only one way in and is frequently busy.

Full text:

Proposed land at Carlton Road. Additional Housing in this area will cause significant further traffic loading on the area and in particular the only road into and out of the area, Castle Drive. This road has only one way in and is frequently busy.

Attachments: None

6108 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 431 Land off Caerleon Road, Dinas Powys / Tir oddi ar Caerleon Road, Dinas Powys

Respondent: Mr Julian Baines MBE [3477]

Summary:

So much unacceptable traffic around Sully Rd. Three schools on Sully Rd puts the road at maximum capacity with constant traffic jams and cars travelling at dangerous speeds. So where is the entrance going to be? Same comments re: schools and doctors

Full text:

So much unacceptable traffic around Sully Rd. Three schools on Sully Rd puts the road at maximum capacity with constant traffic jams and cars travelling at dangerous speeds. So where is the entrance going to be? Same comments re: schools and doctors

Attachments: None

6204 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 431 Land off Caerleon Road, Dinas Powys / Tir oddi ar Caerleon Road, Dinas Powys

Respondent: Mrs Kathryn Baines [3493]

Summary:

Unsuitable for development
Area already over saturated with cars and people
No forward planning to adequately deal with expanding population eg school and medical places
Erosion of habitat for wildlife, green spaces are being developed when other sites that are more industrial or brownfield should be utilised

Full text:

Unsuitable for development
Area already over saturated with cars and people
No forward planning to adequately deal with expanding population eg school and medical places
Erosion of habitat for wildlife, green spaces are being developed when other sites that are more industrial or brownfield should be utilised

Attachments: None

6435 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 434 Land at Pen y Turnpike Road, SW of Llandough Hospital / Tir yn Pen y Turnpike Road, i'r de-orllewin o Ysbyty Llandochau

Respondent: Chirag Metha [2123]

Summary:

strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.

Conclusion

The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.

Approving these sites would result in:

• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment

For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.

Full text:

strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.

Conclusion

The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.

Approving these sites would result in:

• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment

For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.

Attachments:

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

6440 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 434 Land at Pen y Turnpike Road, SW of Llandough Hospital / Tir yn Pen y Turnpike Road, i'r de-orllewin o Ysbyty Llandochau

Respondent: Mrs Sweta Mehta [2120]

Summary:

Previously Rejected Candidate Sites
I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.
Conclusion
The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.
Approving these sites would result in:
• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment
For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.
I trust that these concerns will be fully considered as part of the consultation process

Full text:

Previously Rejected Candidate Sites
I strongly support the Council's earlier decision to deem Candidate Sites 353, 368, 429 and 434 unsuitable for development. These sites must not be reconsidered or brought forward at any stage of the plan.
Conclusion
The proposals affecting Llandough fail to demonstrate that the necessary infrastructure, transport capacity, environmental protections, and community facilities are in place to support the scale of development proposed.
Approving these sites would result in:
• Significant deterioration in traffic conditions and road safety
• Loss of green buffer land between communities
• Increased flooding risk
• Further strain on already stretched public services
• Damage to local wildlife and the natural environment
For these reasons, I respectfully request that these sites be removed from the RLDP Deposit Plan and not taken forward for allocation.
I trust that these concerns will be fully considered as part of the consultation process

Attachments: None

4928 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 443 Land at Caerleon Road, Dinas Powys / Tir yn Caerleon Road, Dinas Powys

Respondent: Mr Jamie Swain [3023]

Summary:

Localised flooding already experienced on two occasions in the past 5 years. Concerned for wildlife in large hedgerows to the rear of properties on Caerwent Close, foxes, bats, dormice and various species of birds including owls. Roads on entry to the proposed area and existing housing are already treacherous, blind corners, parked vehicles and children playing often in the streets, alterations would need to be made to the present access road of Conway Close.

Full text:

Localised flooding already experienced on two occasions in the past 5 years. Concerned for wildlife in large hedgerows to the rear of properties on Caerwent Close, foxes, bats, dormice and various species of birds including owls. Roads on entry to the proposed area and existing housing are already treacherous, blind corners, parked vehicles and children playing often in the streets, alterations would need to be made to the present access road of Conway Close.

Attachments: None

5362 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 443 Land at Caerleon Road, Dinas Powys / Tir yn Caerleon Road, Dinas Powys

Respondent: Mr Kevin Totterdell [3243]

Summary:

Congestion

Full text:

Congestion

Attachments: None

4738 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 444 Land north of Dinas Powys / Tir i'r gogledd o Ddinas Powys

Respondent: Mrs Debbie Totterdell [1547]

Summary:

Flooding and 1000 more cars blocking cardiff road

Full text:

Flooding and 1000 more cars blocking cardiff road

Attachments: None

5063 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 444 Land north of Dinas Powys / Tir i'r gogledd o Ddinas Powys

Respondent: Sarah Teagle [3110]

Summary:

The local road network is already at capacity. Increasing the volume of housing via sites such as 444 and HG1 KS2 will lead to further gridlock on Cardiff Road. The existing infrastructure is insufficient to support the resulting increase in traffic, posing risks to road safety and local air quality.
Furthermore, the site suffers from lack of adequate travel infrastructure and impacts local sites of woodland interest that provide essential ecological buffers and are vital for local biodiversity.
The cumulative impacts of sites around Dinas and Llandough represents an overdevelopment of the area and a burden on the community.

Full text:

I am writing to formally submit my objections regarding the proposed Local Development Plan (LDP) candidate sites in Llandough and Dinas Powys. Specifically, I am objecting to Site 444 (Eastbrook/Cardiff Road), Site 400 (Penlan Hill), and Site HG1 KS2.
My grounds for objection are outlined below:
1. Pressure on Local Infrastructure and Roads
The local road network, particularly the primary routes through Dinas Powys and Llandough, is already at absolute capacity. Increasing the volume of housing via sites such as 444 and HG1 KS2 will lead to further gridlock on the Cardiff Road. The existing infrastructure is insufficient to support the resulting increase in traffic, posing risks to both road safety and local air quality.
2. Lack of Sustainable Travel Options
Despite the proximity to existing settlements, these sites suffer from a lack of adequate travel infrastructure. Without significant improvements to public transport and safe pedestrian/cycle links, these developments will remain car-dependent, further exacerbating the congestion issues mentioned above.
3. Destruction of Green Belt and Woodland
The proposed development of Site 400 (Penlan Hill) and the sites in and around Llandough would result in the irreversible destruction of the local Green Belt. Furthermore, I am deeply concerned about the impact on local sites of woodland interest. These areas provide essential ecological buffers and are vital for local biodiversity; their removal for housing is environmentally unjustifiable.
4. Cumulative Impact
The inclusion of multiple sites, including the "small" section off Cardiff Road (Site 444) and the developments in Llandough, represents an over-development of the area. While I note that Site 429 (Pen-y-Turnpike Road) was not accepted, the remaining proposed sites still place an unsustainable burden on the community.
I trust that these points will be fully considered during the evaluation process.

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/skq

6856 Support

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 444 Land north of Dinas Powys / Tir i'r gogledd o Ddinas Powys

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

Persimmon fully supports Site Ref KS2 – Land to the North of Dinas Powys as a proposed allocation within the RLDP but also considers that this can be further extended to strengthen the Council's position on housing numbers in the interest of ensuring the plan is soundly prepared. the extended site is capable of not only accommodating the additional housing need generated by an increased flexibility allowance, but also of delivering a larger mixed-use development and further enhancing the role and function of Dinas Powys. The extended site option presents a significant opportunity to enhance local facilities and green infrastructure provision within a highly accessible and sustainable location. This could include additional education provision, public open space, playing fields, community orchard and/or allotments, dedicated active travel links via pedestrian footpaths and cycleways.
Although the extended site is also identified within the Cwrt-yr-Ala basin Special Landscape Area, the site is naturally well screen from viewpoints further afield due to vegetation and topography.
The Tir Collective Landscape Assessment, as submitted with the Candidate Site, concluded that any development proposals would not result in the coalescence of settlement areas. It is reiterated that the next nearest settlement area is circa 370m from the site and an area of undeveloped land would be maintained between settlement areas. Furthermore, a landscape-led approach to potential development on the site could also control the extent of development, mange the urban form, and prevent more sensitive areas from encroachment. This could be achieved by retaining key features such as vegetated field boundaries and small woodland blocks and exclude most sensitive areas from development. This approach would also help to retain features that contribute towards the character of open countryside.

Full text:

Boyer are pleased to submit this representation on behalf of our client, Persimmon Homes Ltd (Persimmon), in response to the current consultation regarding the Vale of Glamorgan's (VoG) Replacement Local Development Plan (RLDP) Deposit Plan.

This submission relates to the extended c31ha site known as 'Land North of Dinas Powys' and builds upon the previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.

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

As you will be aware Persimmon have also provided representations for support of the smaller development Key Site KS2 –North of Dinas Powys, off Cardiff Road and forming part of Candidate Site Ref. No 444.

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

The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

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

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

The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

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

Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect extended site at Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.

In principle, Persimmon support the 'Placemaking' theme and consider that development in Dinas Powys would ensure a

strong sense of identity and that the extended scheme is capable of providing a wider range of services including education and leisure/open space.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the extended residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

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

The provision of the extended Candidate Site Ref: 444 is capable of providing a comprehensive residential-led mixed use development. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional facilities/services to further enhances Dinas Powys role as a Primary Settlement thereby supporting both existing and future residents.

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

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

Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

The extended option at Dinas Powys aligns with such principles whilst also providing an opportunity to facilitate a wider range of uses which are designed to respond to local need. The latter could include enhanced education provision, public open space, playing fields, community orchard/ allotments, active travel links via dedicated pedestrian footpaths and cycleways, SuDS features and other community facilities.

Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

The extended Candidate Site as part of a wider allocation in Dinal Powys would seek to increase both on-site and off-site measures to further enhance the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance.

Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.

Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year

average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.

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

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

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

Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidenced by the proposed smaller allocation Site Ref KS2 – Land to the North of Dinas Powys, the site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period. These same principles can be applied to the larger extended site forming part of Candidate Site Ref. No. 444. Moreover, the extended site is capable of not only accommodating the additional housing need generated by an increased flexibility allowance, but also of delivering a larger mixed-use development and further enhancing the role and function of Dinas Powys. The extended site can provide services and facilities, including education, leisure/recreation and open space for both proposed and existing residents.
Persimmon therefore fully supports Site Ref KS2 – Land to the North of Dinas Powys as a proposed allocation within the RLDP. Although also considers that this can be further extended to strengthen the Council's position on housing numbers in the interest of ensuring the plan is soundly prepared.

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

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

Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.

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

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

In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys.

This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.

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

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

Moreover, the extended site option presents a significant opportunity to enhance local facilities and green infrastructure provision within a highly accessible and sustainable location. This could include additional education provision, public open space, playing fields, community orchard and/or allotments, dedicated active travel links via pedestrian footpaths and cycleways,
Sustainable Drainage Systems (SuDS) features, and other community facilities. Integrating these elements at the heart of the site would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.

In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.

Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP.

This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

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

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

Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

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

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the

Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.

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

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

However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.

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

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

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

The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

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

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

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

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

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes

annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

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

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further.

Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

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

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

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as the extended option at Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

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

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

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

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

that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

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

Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement. Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. In this regard, it has the capacity to accommodate a greater level of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions to supports local services and facilities, and reduces reliance on private vehicle travel.

However, it is equally important that the policy allows sufficient flexibility to accommodate appropriate extensions to settlement boundaries where necessary to support long-term growth over the emerging plan period. In some circumstances, limited and well-planned edge-of-settlement expansion may represent the most sustainable option, particularly where brownfield opportunities are constrained or insufficient to meet local housing requirements. The extended site at Dinas Powys would provide an opportunity for comprehensive masterplanning, improved infrastructure provision, and enhanced green infrastructure, delivering benefits that incremental infill alone may not achieve.

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

The extended site at Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of Planning Policy Wales 12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

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

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality

architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

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

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

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.

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

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

The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments

The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist

and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

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

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.

Whilst we agree that delivering up to 250 homes in this location makes effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, Persimmon also consider that the current allocation could be extended to accommodate the wider Candidate Site Ref No. 444 to help increase the delivery of both full market and affordable homes. This approach would remain consistent with the overarching spatial strategy of the Deposit Plan and better accord with regional growth aspirations.

A particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.

Further to the above, the allocation shall also facilitate key enhancements in respect of environmental and community infrastructure measures. That said, the extended sites option also provides opportunities for further improvements by facilitating a wider range of uses which are designed to respond to local need. The latter could include enhanced education provision, public open space, playing fields, community orchard/ allotments, additional active travel links, SuDS features and other community facilities. Thereby reinforcing a strong and sustainable neighbourhood core at the centre of the site for both existing and further residents to utilise.

Moreover, the provision of a linear park along the northern boundary of the extend option, would help naturally integrate the site within the surrounding landscape framework to mitigate any visual impact and deliver further enhancements with regards to biodiversity net gain. Sustainable Drainage Systems are also able to be integrated within this green infrastructure network that extends through the centre of the site, ensuring compliance with flood risk requirements while providing a space of recreational activities. Lastly, Persimmon remain committed to ensuring that, where necessary, the requisite contributions are made towards local infrastructure provision.

In light of the above the proposed allocation represents a sustainable extension to the existing settlement of Dinas Powys. Whilst this position is fully supported Persimmon Homes, we simply wish to highlight the additional benefits the extended site option could facilitate in terms of delivering much-needed full market and affordable housing, alongside key social, environmental and economic improvements.

Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:

Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in

nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.

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

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

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

Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures.

The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

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

By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys. Page 22 of 31

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

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

On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The extended option at Dinas Powys represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

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

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

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

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

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

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

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

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

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

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

Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. The extended site in Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

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

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

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

Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications.

There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency.

As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System,

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

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

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently.

The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

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

Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness both the proposed allocation (Land at north Dinas Powys) and extend option have been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site option have been comprehensively planned in a manner consistent with the objectives of Policy SP19. While the extended site technically lies within a locally designated Green Wedge between Dinas Powys, Penarth and Llandough, this designation does not necessarily preclude development. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that development in this location is unlikely to result in settlement coalescence and does not make a significant contribution to the overall integrity of the designation, thereby confirming that the site is capable of accommodating proportionate development.

The emerging masterplans have both adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. In the case of the extended option development has been excluded from the elevated south-western portion of the site, identified as the most visually sensitive area, which will instead be retained as public open space to reduce visual impact and integrate the scheme within the wider landscape. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to provide strong landscape containment.

Although the extended site is also identified within the Cwrt-yr-Ala basin Special Landscape Area, the site is naturally well screen from viewpoints further afield due to vegetation and topography. These principles mean the potential impact of future development would be limited to the immediate locality adjacent to the existing built-up edge of Dinas Powys. The proposed green infrastructure strategy will reinforce landscape features and enhance habitat provision, ensuring the proposal remains in keeping with the wider landscape framework. This is achieved whilst simultaneously maintaining the function of the Green Wedge and aligns with the objectives of Policy SP19.

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

policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas

Whilst Persimmon fully support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1, they maintain an objection to the continued inclusion of the wider proposed site.

A detailed landscape analysis was undertaken as part of the Candidate Site submission by Tir Collective and outlined that the wider development proposals would be contained to a small area in the south of the SLA, immediately to the north of Dinas Powys, where it has been identified that areas of least and lower sensitivity have attributes capable of absorbing some degree of change without affecting the overall character of the SLA.

This assessment still remains relevant and furthermore, the proposed layout reduces development in the southwest and seeks to retain important landscape features. Other key features of the SLA such as woodland, vegetated field boundaries, and steep sided valleys would be retained and remain unaltered, which contributes to the High overall evaluation for LANDMAP Landscape Habitats aspect area.

It is therefore considered that the wider proposed allocation beyond key site (HG1KS2 North of Dinas Powys off Cardiff Road) should be removed from the Cwrt-yr-Ala Basin Special Landscape Area (SLA).

Policy DNP2 – Green Wedges
Whilst Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys, they maintain an objection to the continued inclusion of the wider proposed site.

Planning Policy Wales sets out purpose of green belt, which also applies to local green wedge designation. The Tir Collective Landscape Assessment, as submitted with the Candidate Site, concluded that any development proposals would not result in the coalescence of settlement areas. It is reiterated that the next nearest settlement area is circa 370m from the site and an area of undeveloped land would be maintained between settlement areas. Furthermore, a landscape-led approach to potential development on the site could also control the extent of development, mange the urban form, and prevent more sensitive areas from encroachment. This could be achieved by retaining key features such as vegetated field boundaries and small woodland blocks and exclude most sensitive areas from development. This approach would also help to retain features that contribute towards the character of open countryside.

Overall, potential development of the site and some additional site areas would be contained immediately to the north of Dinas Powys. Potential development would not be located in the narrowest part of the green wedge or result in any settlements from merging. Characteristics of open countryside could be maintained and more sensitive areas to development safeguarded.

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

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this
• strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. As the proposed developer Persimmon Homes remain committed to promoting their land interests for residential development and delivering homes to meet the Vale of Glamorgan's needs.
• That said, from a planning perspective it is also important to recognise the additional benefits the extended option (Candidate Site Ref No. 444) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance and further enhance local facilities within a highly sustainable location. The latter could include additional education provision, public open space, playing fields, community orchard and/or allotments, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other community facilities. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.

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

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3v4

5548 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 450 Hayes Road, Sully / Hayes Road, Sili

Respondent: Mr Corrado Ruta [2774]

Summary:

I object as the proposed use goes against the RLDP Objective 5 – Protecting and Enhancing the Natural Environment, Objective 4 – Placemaking and Objective 2 - Improving Mental and Physical Health and Well-being.
The site is located in an area of natural beauty and tranquillity, by the coastal path and a green area where many locals go walking (including my family) and between Ty Hafan and Beechwood College.

Full text:

I object as the proposed use goes against the RLDP Objective 5 – Protecting and Enhancing the Natural Environment, Objective 4 – Placemaking and Objective 2 - Improving Mental and Physical Health and Well-being.
The site is located in an area of natural beauty and tranquillity, by the coastal path and a green area where many locals go walking (including my family) and between Ty Hafan and Beechwood College.

Attachments: None

4554 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 484 Land at Hayes Road, Barry / Tir yn Hayes Road, y Barri

Respondent: Hayley Graham [2852]

Summary:

Development, housing or business, proposed for Hayes road should not be considered due to the proximity to the established Ty Hafan estate. The very nature of Ty Hafan, which is home to dying children, requires zero disturbance from building works, increased traffic and footfall. Vale communities and beyond have already expressed deep concern about development in this area.

Full text:

Development, housing or business, proposed for Hayes road should not be considered due to the proximity to the established Ty Hafan estate. The very nature of Ty Hafan, which is home to dying children, requires zero disturbance from building works, increased traffic and footfall. Vale communities and beyond have already expressed deep concern about development in this area.

Attachments: None

5549 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 484 Land at Hayes Road, Barry / Tir yn Hayes Road, y Barri

Respondent: Mr Corrado Ruta [2774]

Summary:

I object as the proposed use goes against the RLDP Objective 5 – Protecting and Enhancing the Natural Environment, Objective 4 – Placemaking and Objective 2 - Improving Mental and Physical Health and Well-being.
The site is located in an area of natural beauty and tranquillity, by the coastal path and a green area where many locals go walking (including my family) and between Ty Hafan and Beechwood College.

Full text:

I object as the proposed use goes against the RLDP Objective 5 – Protecting and Enhancing the Natural Environment, Objective 4 – Placemaking and Objective 2 - Improving Mental and Physical Health and Well-being.
The site is located in an area of natural beauty and tranquillity, by the coastal path and a green area where many locals go walking (including my family) and between Ty Hafan and Beechwood College.

Attachments: None

4746 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 2524 The Knole, Pen-Y-Turnpike Road/Y Knole, Pen-y-Turnpike Road

Respondent: Dr Camilla Phillips [2910]

Summary:

Building on this land would destroy vital wildlife habitat and strain existing infrastructure, which is already under pressure. The power supply, sewage, and water systems are inadequate for current needs and would require significant upgrades. The narrow, poorly maintained Pen y Turnpike Road is unsafe and unsuitable for increased traffic, particularly heavy goods vehicles, which would cause accidents and pollution. I believe planning should only proceed if proven that infrastructure issues are addressed and alternative brownfield sites have been considered, as greenfield development should not be approved purely for profit.

Full text:

Building on this land will not only destroy a habitat that is abundant in wildlife that can never be restored, but it will also put pressure on many man made systems that through lack of foresight, poor planning and poor maintenance/management would be unable to cope with an increased number of houses, residents and cars. Firstly, the power supply. Even with updated transformers the supply to the area and Dinas powys as a whole regularly cuts out due to demand, more houses without significant investment on a wide scale would cause more outages. The sewage system and water supply that goes up and down pen y turnpike hill into the village was never built to service as many houses as it does now (evidenced by a major burst of a water pipe at the base of the hill last year), building more houses would require a complete overhaul of the entire sewage and water supply system. Pen y turnpike road itself is a country lane not meant for the amount of traffic it currently has. It is not maintained with uneven road surfaces, narrowings (that can't be changed, nor would I want them to be), rarely salted in the winter months, pot holes that are poorly patched and so reopen constantly during wet and cold weather causing tyre blowouts on a regular basis, the bottom of the road that turns out right onto leckwith road is an unsafe hairpin turn onto a blind bend and the cause of many an accident every year… an increase of cars needing to use this road and the amount of heavy goods vehicles that would have to be driven along it to build any number of houses would be unsustainable and cause a huge number of problems, not withstanding the traffic jams that would be caused which would increase the pollution in the area. If I was to ignore the blatant lack of care and respect shown to the flora and fauna of the local environment (that should be allowed to thrive by itself and contributes to the health and wellbeing of the local population) by the planning of its destruction for profit, I would suggest that it would only be basic logic and sensible planning that all of the other factors must be proven to be adequately invested in, improved and/or resolved before any planning be approved, not approving planning with "assurances that these issues will be addressed". I would also like evidence that there are no other brown field sites that would work just as well, albeit more complicated and at a slightly higher expense - I would trust that the building of houses on a green field site to the objection of almost everyone would not be approved simply for a matter of ease and profit.

Attachments: None

5559 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 3840 Holms Farm, Pen-Y-Turnpike Road/Fferm Holms, Pen-Y-Turnpike Road

Respondent: Mr Corrado Ruta [2774]

Summary:

I oppose developing this site for housing because it conflicts with key RLDP objectives. It undermines efforts to mitigate climate change, improve health and wellbeing, and promote active and sustainable travel, due to inadequate public transport and active travel infrastructure. Previous developments have increased traffic without corresponding infrastructure improvements. I believe plans should prioritise enhancing transport and infrastructure before further housing. The site's location in a natural, tranquil, heritage rural area crossed by a public right of way also makes the development unsuitable, as it threatens the environment and local character.

Full text:

I strongly object to development of this site for housing as it goes against some key objectives of the RLDP. I object because it goes against "Objective 1 - Mitigating and Adapting to Climate Change" and "Objective 2 - Improving Mental and Physical Health and Well-being" and "Objective 8 - Promoting Active and Sustainable Travel Choices" because the area hasn't got adequate public transport nor active travel infrastructure, so all new residents will be forced to move by car for virtually any needs. The recent housing developments in Dinas, Barry and Sully have already created enormous traffic pressure on the poor road network and were not accompanied by any improvement in public transport nor active travel infrastructure. Significant improvements in public transport and active travel infrastructure should be planned and undertaken prior to any further housing development. I object as the proposed use goes against the RLDP Objective 5 – Protecting and Enhancing the Natural Environment, Objective 4 – Placemaking and Objective 2 - Improving Mental and Physical Health and Well-being. The site is located in an area of natural beauty and tranquillity, heritage rural setting and crossed by a public right of way for local walkers.

Attachments: None

4747 Object

Document Element: PENARTH AND AREA / PENARTH A'R CYLCH, 4067 Land at Pen y Turnpike Road, northwest of Llandough Hospital /Tir yn Pen y Turnpike Road, i'r gogledd-orllewin o Ysbyty Llandochau

Respondent: Dr Camilla Phillips [2910]

Summary:

Building on this land would destroy a vital wildlife habitat and strain local systems lacking sufficient investment. The current power, sewage, and water supplies are inadequate for increased demand, risking outages and system failures. Pen y Turnpike Road is unsafe and poorly maintained; more traffic and heavy vehicles would cause accidents and pollution. I believe development should only proceed if these infrastructure issues are fully addressed and investments made. Evidence should be provided that no suitable brownfield sites exist, as greenfield development prioritises profit over environmental and community well-being.

Full text:

Building on this land will not only destroy a habitat that is abundant in wildlife that can never be restored, but it will also put pressure on many man made systems that through lack of foresight, poor planning and poor maintenance/management would be unable to cope with an increased number of houses, residents and cars. Firstly, the power supply. Even with updated transformers the supply to the area and Dinas powys as a whole regularly cuts out due to demand, more houses without significant investment on a wide scale would cause more outages. The sewage system and water supply that goes up and down pen y turnpike hill into the village was never built to service as many houses as it does now (evidenced by a major burst of a water pipe at the base of the hill last year), building more houses would require a complete overhaul of the entire sewage and water supply system. Pen y turnpike road itself is a country lane not meant for the amount of traffic it currently has. It is not maintained with uneven road surfaces, narrowings (that can't be changed, nor would I want them to be), rarely salted in the winter months, pot holes that are poorly patched and so reopen constantly during wet and cold weather causing tyre blowouts on a regular basis, the bottom of the road that turns out right onto leckwith road is an unsafe hairpin turn onto a blind bend and the cause of many an accident every year… an increase of cars needing to use this road and the amount of heavy goods vehicles that would have to be driven along it to build any number of houses would be unsustainable and cause a huge number of problems, not withstanding the traffic jams that would be caused which would increase the pollution in the area. If I was to ignore the blatant lack of care and respect shown to the flora and fauna of the local environment (that should be allowed to thrive by itself and contributes to the health and wellbeing of the local population) by the planning of its destruction for profit, I would suggest that it would only be basic logic and sensible planning that all of the other factors must be proven to be adequately invested in, improved and/or resolved before any planning be approved, not approving planning with "assurances that these issues will be addressed". I would also like evidence that there are no other brown field sites that would work just as well, albeit more complicated and at a slightly higher expense - I would trust that the building of houses on a green field site to the objection of almost everyone would not be approved simply for a matter of ease and profit.

Attachments: None

5009 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 355 Land West of St Brides Road, Wick / Tir i'r gorllewin o St. Brides Road, y Wig

Respondent: Mr Robert Davies [3074]

Summary:

The site conflicts with national planning policy and the RLDP's spatial strategy, promoting unsustainable and disproportionate growth that would harm Wick's rural character and setting. Development should prioritise brownfield or well-located sites near existing urban areas with suitable infrastructure. This proposal would damage Green Wedges and Green Infrastructure and represents unnecessary countryside development. It extends the settlement into open countryside, eroding its form and rural approach. Wick lacks the services, transport and infrastructure to support such growth, and local roads are constrained. The site would also create significant landscape and visual harm. It therefore fails key RLDP soundness tests.

Full text:

The site conflicts with national planning policy and the RLDP's spatial strategy, promoting unsustainable and disproportionate growth that would harm Wick's rural character and setting. Development should prioritise brownfield or well-located sites near existing urban areas with suitable infrastructure. This proposal would damage Green Wedges and Green Infrastructure and represents unnecessary countryside development. It extends the settlement into open countryside, eroding its form and rural approach. Wick lacks the services, transport and infrastructure to support such growth, and local roads are constrained. The site would also create significant landscape and visual harm. It therefore fails key RLDP soundness tests.

Attachments: None

5167 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 355 Land West of St Brides Road, Wick / Tir i'r gorllewin o St. Brides Road, y Wig

Respondent: Miss Lynn Goward [820]

Summary:

The proposed inclusion of land in Wick for development is not sufficiently justified by local evidence. While the VOG has a recognised need for additional housing, no Wick specific housing needs assessment has been presented to demonstrate that development of this scale is proportionate to the villages size, character and infrastructure capacity. Affordable housing need does not automatically justify this oversized development of Wick. Wicks status as a minor rural settlement, countryside protection and creeping village expansion have to be considered. It should be more suited to towns and strategic growth areas. Existing drainage and sewage infrastructure is limited.

Full text:

The proposed inclusion of land in Wick for development is not sufficiently justified by local evidence. While the VOG has a recognised need for additional housing, no Wick specific housing needs assessment has been presented to demonstrate that development of this scale is proportionate to the villages size, character and infrastructure capacity. Affordable housing need does not automatically justify this oversized development of Wick. Wicks status as a minor rural settlement, countryside protection and creeping village expansion have to be considered. It should be more suited to towns and strategic growth areas. Existing drainage and sewage infrastructure is limited.

Attachments: None

5373 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 355 Land West of St Brides Road, Wick / Tir i'r gorllewin o St. Brides Road, y Wig

Respondent: Mr Gareth Thomas [2975]

Summary:

I object to the potential development of Site ID 355 Wick, within the RDLP process. While the Council has not taken this site forward for allocation in the Deposit Plan, I wish to record my objection should it be reconsidered at any later stage. Wick is a small rural settlement that has already experienced significant recent housing growth without corresponding expansion in services or infrastructure. Additional development on further greenfield sites would risk disproportionate expansion of the village and incremental erosion of its rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy.

Full text:

I formally object to the potential development of Site ID 355 Wick, identified during the RLDP candidate site process. Although this site has not been taken forward for allocation in the Deposit Plan, I wish to register this objection for the record should the site be reconsidered at any stage during the examination or future revisions to the Plan. For avoidance of doubt, I have recorded this as a 'Comment' rather than an 'Objection', as I do not object to the current decision not to take this site forward for further consideration.

Wick is a small rural settlement that has already experienced notable housing growth in recent years. While the provision of housing is recognised as important, development within smaller settlements must remain proportionate to the scale, function, and infrastructure capacity of the community. Wick has a limited service base and relies heavily on nearby towns for employment, healthcare, secondary education and many everyday services. Continued housing growth in such circumstances risks reinforcing unsustainable travel patterns and increasing reliance on private car journeys.

In this context, further development on additional greenfield sites around the village would represent incremental outward expansion of the settlement. Such expansion has the potential to erode the rural character of Wick and alter its historic form and relationship with the surrounding countryside. Development pressures on multiple edge-of-settlement sites, outside of the strategic growth area, would cumulatively change the scale and character of the village in a way that is disproportionate to its role within the settlement hierarchy.

Evidence prepared for the RLDP has already identified a range of sustainability and infrastructure considerations affecting development within the village. Where candidate sites have been assessed in detail, a number of environmental and infrastructure constraints have been identified. It is therefore reasonable to expect that similar issues would arise for other sites around the settlement unless robust evidence demonstrates otherwise.

For these reasons, further expansion of Wick through development on additional candidate sites would not represent proportionate or sustainable growth. Any reconsideration of Site ID 355 should therefore be resisted unless clear and robust evidence demonstrates that development would be consistent with the Plan's spatial strategy, infrastructure capacity, and national sustainability objectives.

Attachments: None

5391 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 355 Land West of St Brides Road, Wick / Tir i'r gorllewin o St. Brides Road, y Wig

Respondent: Mrs Clair Thomas [3069]

Summary:

I object to the potential development of Site ID 355 Wick, within the RDLP process. While the Council has not taken this site forward for allocation in the Deposit Plan, I wish to record my objection should it be reconsidered at any later stage. Wick is a small rural settlement that has already experienced significant recent housing growth without corresponding expansion in services or infrastructure. Additional development on further greenfield sites would risk disproportionate expansion of the village and incremental erosion of its rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy.

Full text:

I formally object to the potential development of Site ID 355 Wick, identified during the RLDP candidate site process. Although this site has not been taken forward for allocation in the Deposit Plan, I wish to register this objection for the record should the site be reconsidered at any stage during the examination or future revisions to the Plan. For avoidance of doubt, I have recorded this as a 'Comment' rather than an 'Objection', as I do not object to the current decision not to take this site forward for further consideration.

Wick is a small rural settlement that has already experienced notable housing growth in recent years. While the provision of housing is recognised as important, development within smaller settlements must remain proportionate to the scale, function, and infrastructure capacity of the community. Wick has a limited service base and relies heavily on nearby towns for employment, healthcare, secondary education and many everyday services. Continued housing growth in such circumstances risks reinforcing unsustainable travel patterns and increasing reliance on private car journeys.

In this context, further development on additional greenfield sites around the village would represent incremental outward expansion of the settlement. Such expansion has the potential to erode the rural character of Wick and alter its historic form and relationship with the surrounding countryside. Development pressures on multiple edge-of-settlement sites, outside of the strategic growth area, would cumulatively change the scale and character of the village in a way that is disproportionate to its role within the settlement hierarchy.

Evidence prepared for the RLDP has already identified a range of sustainability and infrastructure considerations affecting development within the village. Where candidate sites have been assessed in detail, a number of environmental and infrastructure constraints have been identified. It is therefore reasonable to expect that similar issues would arise for other sites around the settlement unless robust evidence demonstrates otherwise.

For these reasons, further expansion of Wick through development on additional candidate sites would not represent proportionate or sustainable growth. Any reconsideration of Site ID 355 should therefore be resisted unless clear and robust evidence demonstrates that development would be consistent with the Plan's spatial strategy, infrastructure capacity, and national sustainability objectives.

Attachments: None

4727 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 362 Land at Moat Farm / Tir ar Fferm y Moat

Respondent: Mr Dylan Williams [2901]

Summary:

I object as this would development in a Conservation area. The highway infrastructure is not suitable. There is no public transport. It would spoil outstanding views. There is a medieval moat and mound in the field. It would be disproportionate.

Full text:

I object as this would development in a Conservation area. The highway infrastructure is not suitable. There is no public transport. It would spoil outstanding views. There is a medieval moat and mound in the field. It would be disproportionate.

Attachments:

IMG_0081.jpeg - https://valeofglamorgan.oc2.uk/a/sc4

5337 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 363 Land forming part of The Beaupre Estate, St Hilary/ /Tir sy'n ffurfio rhan o Ystâd y Bewpyr, Saint Hilari

Respondent: Mr David Metcalf [3234]

Summary:

This area of the Vale is completely unsuited to housing development - it is not near any existing village or town and is rural greenbelt. It should be protected at all costs. The Vale should focus on brownfield sites and infill in existing towns and villages rather than build on virgin land.

Full text:

This area of the Vale is completely unsuited to housing development - it is not near any existing village or town and is rural greenbelt. It should be protected at all costs. The Vale should focus on brownfield sites and infill in existing towns and villages rather than build on virgin land.

Attachments: None

4454 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Laura Fletcher [2787]

Summary:

Previous assessment ruled it unsuitable for further development due to negative impact of on the setting of the Schedule Ancient Monument and potential significant loss of protected trees.
Neither factor has changed so there is not rationale to reverse this previous decision.

Full text:

Previous assessment ruled it unsuitable for further development due to negative impact of on the setting of the Schedule Ancient Monument and potential significant loss of protected trees.
Neither factor has changed so there is not rationale to reverse this previous decision.

Attachments: None

4513 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Cowbridge and Llanblethian Residents Group (Dr Christopher Pearce, Cowbridge and Llanblethian Residents Group - Committee Member) [1105]

Summary:

Land South of Llantwit Major Road, Cowbridge should not be allocated for housing because of its special historical setting for the Cear Dynaf iron age hill fort immediately above it.

Full text:

Land South of Llantwit Major Road, Cowbridge should not be allocated for housing because of its special historical setting for the Cear Dynaf iron age hill fort immediately above it.

Attachments: None

4521 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Miss Jane Brown [1309]

Summary:

I am objecting to this site's inclusion in the RLDP. The use of these fields has been for centuries agricultural. The fields adjoin Llanblethian Hill (locally known as Mount Ida). Llanblethian Hill is significant as it is a site of historical importance. Houses should be built on brownfield sites not green fields. The Clare Garden Village development still has unbuilt and unsold houses.
Cowbridge doesn't have the infrastructure to cope with the existing houses and will not cope with more, eg appointments with doctors and dentists, car parking, schools.

Full text:

I am objecting to this site's inclusion in the RLDP. The use of these fields has been for centuries agricultural. The fields adjoin Llanblethian Hill (locally known as Mount Ida). Llanblethian Hill is significant as it is a site of historical importance. Houses should be built on brownfield sites not green fields. The Clare Garden Village development still has unbuilt and unsold houses.
Cowbridge doesn't have the infrastructure to cope with the existing houses and will not cope with more, eg appointments with doctors and dentists, car parking, schools.

Attachments: None

5022 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mrs Suzanna Browning [700]

Summary:

This is an area of outstanding natural beauty protected by CADW as it houses an old fortress. This land should never be considered for development- the estate Clare Garden Village us more than enough together with a WELSH school (to be built in the very near future)

CADW will be involved to protect at all costs. This land should never be built on

Full text:

This is an area of outstanding natural beauty protected by CADW as it houses an old fortress. This land should never be considered for development- the estate Clare Garden Village us more than enough together with a WELSH school (to he built in the very near future)

CADW will be involved to protect at all costs. This land should never be built on

Attachments: None

5120 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Llywelyn Lehnert [3133]

Summary:

Potential development of this site ignores the importance of preserving the nearby, ancient schedule monument, as well as representing an unacceptable intrusion into the local countryside, in particular the wildlife these fields, hedges and nearby forests support. Previously (Nov 2025), Vale Council planners identified sites such as this as not being appropriate for development for these reasons, plus their isolated nature with extremely limited walking, cycling or public transport accessibility. These reasons, plus the large number of houses still to be built and sold in CG Village, should mean this site is not developed but instead preserved as it is.

Full text:

Potential development of this site ignores the importance of preserving the nearby, ancient schedule monument, as well as representing an unacceptable intrusion into the local countryside, in particular the wildlife these fields, hedges and nearby forests support. Previously (Nov 2025), Vale Council planners identified sites such as this as not being appropriate for development for these reasons, plus their isolated nature with extremely limited walking, cycling or public transport accessibility. These reasons, plus the large number of houses still to be built and sold in CG Village, should mean this site is not developed but instead preserved as it is.

Attachments: None

5234 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mr Christopher Holt [3183]

Summary:

Proposed development here ignores the importance of the nearby ancient monument and represents a major threat to local wildlife and rural character. In late 2025, the Council rightly identified this area as unsuitable due to its isolation and poor accessibility. With a large volume of housing already being delivered in CG Village, there is no justification for building on this site; it should remain protected green space

Full text:

Proposed development here ignores the importance of the nearby ancient monument and represents a major threat to local wildlife and rural character. In late 2025, the Council rightly identified this area as unsuitable due to its isolation and poor accessibility. With a large volume of housing already being delivered in CG Village, there is no justification for building on this site; it should remain protected green space

Attachments: None

5505 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Tony Marshall [3278]

Summary:

This site lies within the Upper & Lower Thaw Valley Special Landscape Area, per the existing Vale of Glamorgan Local Development Plan. This indicates that this location is of high landscape and setting value and would be of low suitability for development. The visual impact is likely to be particularly great given the elevated location of this site. The woodland bordering the site is listed in the AWI as being ancient, and would be highly sensitive to adjacent development (e.g. from airborne pollution, increased recreational pressure, ground compression, changes to hydrology). It is 3a Good-Moderate agricultural land.

Full text:

This site lies within the Upper & Lower Thaw Valley Special Landscape Area, per the existing Vale of Glamorgan Local Development Plan. This indicates that this location is of high landscape and setting value and would be of low suitability for development. The visual impact is likely to be particularly great given the elevated location of this site. The woodland bordering the site is listed in the AWI as being ancient, and would be highly sensitive to adjacent development (e.g. from airborne pollution, increased recreational pressure, ground compression, changes to hydrology). It is 3a Good-Moderate agricultural land.

Attachments: None

5781 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mr MICHAEL FLETCHER [3369]

Summary:

There's significantly reduced green space in the surrounded area which would be compounded by further development.

Full text:

Theres significantlly reduced green space in the surrounded area which would be compounded by further development.

Attachments: None

5797 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mrs Nicola Massie [3378]

Summary:

This portion of land is of historic note as it leads up to the iron age hill fort which is one of the important areas of Cowbridge and of particular historical interest and value to CADW. It provides a rural backdrop to the town and as there is a footpath through it provides green open space with public access and is regularly used as such. Additionally the development at Clare Garden Village is not complete and therefore adequate housing in the locality is going to be available in addition to the other areas already being developed in Cowbridge.

Full text:

This portion of land is of historic note as it leads up to the iron age hill fort which is one of the important areas of Cowbridge and of particular historical interest and value to CADW. It provides a rural backdrop to the town and as there is a footpath through it provides green open space with public access and is regularly used as such. Additionally the development at Clare Garden Village is not complete and therefore adequate housing in the locality is going to be available in addition to the other areas already being developed in Cowbridge.

Attachments: None

5930 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Lindsey Bulleid [2240]

Summary:

I believe this site is better suited to development as these areas are already partially suburbanised and do not have the unspoilt rural views/space/character that the bryn melin and associated sites do. There is already some development within the area of this site. It is well connected with safe easy walking routes into the town centre, and better developed access to public transport and local amenities.

Full text:

I would like to express my objection to development of the proposed Bryn Melin site 370.

Environmentally I feel this is an inappropriate area to develop. The site (and adjoining sites 475/514) are within the Thaw valley designated special landscape area which should be protected.
Development here would destroy the character of the area and significantly impact negatively on the biodiversity and the natural lived experience of the people within Cowbridge. This is against the vale of Glamorgan's goals to respect landscape a resource, respect scenic quality of an area, respect unspoilt character and integrity, respect the sense of place created by landscape and to conserve these attributes. The valley and the fields, the view, the sense of open space, the footpaths that people can use to walk and enjoy being in nature right next the Cowbridge town are all integral to the sense of character and place of Cowbridge. This section of the valley currently stands alone as a natural vista, and does not have encroachment of suburban development. It is enjoyed by so many. You stand in it and look out, you walk through it, and you can be entirely in the countryside. This is a significant characteristic of a rural town such as Cowbridge and losing this here will represent suburban creep and destruction of this natural character. These attributes would be ruined by development here. I believe other proposed sites such as sites 455 and 367 are better suited to development as these areas are already partially suburbanised and do not have the unspoilt rural views/space/character that the bryn melin and associated sites do.

Ultimately, there is no development currently on the Bryn Melin site, whereas there is already some development within the area of the sites 455 and 367.

Functionally I also have significant concerns about development of Bryn Melin site 370 and the adjoining sites 475 and 514. The transport infrastructure is not supportive of housing here. The St Athan road is small, windy, dangerous with no footpath. There is no public transport within easy walking distance. Amenities are also not within safe or easy walking distance and will necessitate people driving into Cowbridge. This is completely against the Vale's own goals and ideation when it comes to sustainable and appropriate development. Conversely sites 455 and 367 are well connected with safe easy walking routes into the town centre, and access to public transport.

The site at Bryn Melin is also very steep which environmentally and socially is not a good characteristic for development. The slope is 12% and there is poor access. Again, the sites proposed at 455 and 367 appear more suitable for development with better developed access to the local amenities.

Cowbridge Town Council unanimously rejected the inclusion of Site 370 in the RLDP on 24/02/2026
As outlined in the Cowbridge Placemaking Plan, local identity, sustainable growth, and protection/enhancement of town character, public spaces and the town-edge environment is incredibly important.
Building on these sites in this unspoilt valley is contrary to these principles and undermines local placemaking desires. There must be sites that are more coherent with the ideals and values of the area?

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t8n

5966 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Michael Lewis [3443]

Summary:

With site 367 my concern is this site is on the side of a hill where water run-off if a large housing development went ahead could adversely affect the road below.
Also, my understanding is that it would be close vicinity to an iron age fort, which is a significance.

Full text:

I have concerns over the inclusion of certain candidate sites:

367-my concern is this site is on the side of a hill where water run-off if a large housing development went ahead could adversely affect the road below.
Also, my understanding is that it would be close vicinity to an iron age fort, which is a significance.

Sites 438 and 440 would put tremendous pressure onto the barely adequate road infrastructure in that area and also create a hazard for traffic pulling out onto the B4270 at the cross Inn. It would also my view be an unnecessary intrusion into the open countryside.

Site 455, again I think would put a lot of pressure on the road infrastructure and traffic lights at Cowbridge and again be an unnecessary intrusion into the open countryside. And would adversely affect the aesthetics of the gateway to Cowbridge which partly gives the town so much of its charm!

I think a very sensible inclusion is 448 the airfield and brownfield site at Llandow. My understanding is that with a little effort a new rail link could be established for this site which would be very sensible with regard to taking pressure from the road network.

Please let me know if it is not acceptable for me to comment on a number of sites in one email and I will gladly send other emails for each site individually.

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/tv8

5989 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Felicity Michaelides [3449]

Summary:

This is near a historically significant site, again putting extra strain on the infrastructure of Cowbridge. It is also an unnecessary intrusion into the countryside.

This attractive, small, rural market town is rapidly morphing into a larger more suburban dormitory community for Cardiff, effectively detracting from its' rich historical and traditionally agricultural identity. To add further housing developments on the periphery of the town will add unacceptable strain to the already congested high street and parking facilities.

Cowbridge has always been considered an attractive tourist destination, as well as a thriving agricultural centre. It is significant that agriculture which has been key to the economy of the area, has been pushed to the margins of the community with the Market Place being turned into a car park to cater for the influx of people on the recent development of Claire Gardens. Even this is inadequate with people parking in inappropriate places, and with it more congestion in the High Street and raised pollution. This is now; before new developments are added.

Full text:

Candidate Site 367

This is near a historically significant site, again putting extra strain on the infrastructure of Cowbridge. It is also an unnecessary intrusion
into the countryside.
This attractive, small, rural market town is rapidly morphing into a larger more suburban dormitory community for Cardiff, effectively
detracting from its' rich historical and traditionally agricultural identity. To add further housing developments on the periphery of the town will
add unacceptable strain to the already congested high street and parking facilities.
Cowbridge has always been considered an attractive tourist destination, as well as a thriving agricultural centre. It is significant that agriculture
which has been key to the economy of the area, has been pushed to the margins of the community with the Market Place being turned into a car park
to cater for the influx of people on the recent development of Claire Gardens. Even this is inadequate with people parking in inappropriate places, and with
it more congestion in the High Street and raised pollution. This is now; before new developments are added.

In consideration of the facts which I have outlined above, I would urge the Planning Department to reconsider where these developments should be situated,
and preferably place them on the more appropriate outlying brown field sites.

Attachments:

Redacted Email Rep - https://valeofglamorgan.oc2.uk/a/3xj

6035 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mrs Susannah Thomas [3454]

Summary:

Access too dangerous. Do not put in LDP.

Full text:

Access too dangerous. Do not put in LDP.

Attachments: None

6103 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mr Richard Norris [3249]

Summary:

Re. Site no 367

We object to the above candidate sites as
they represent unacceptable intrusion into the local countryside as stated in the LDP in 2025, and have a
severe impact on the setting of a very ancient Celtic-Romano fortification. Furthermore the previous LDP 2021-2036
rejected these sites in 2015 at the Deposit Plan Stage. Site 438 and 440 would both be difficult for cycling and walking
into Cowbridge which is a mile away, and there is no bus service

Full text:

Re. Site nos 367, 438, 440

We object to the above candidate sites as
they represent unacceptable intrusion into the local countryside as stated in the LDP in 2025, and have a
severe impact on the setting of a very ancient Celtic-Romano fortification. Furthermore the previous LDP 2021-2036
rejected these sites in 2015 at the Deposit Plan Stage. Site 438 and 440 would both be difficult for cycling and walking
into Cowbridge which is a mile away, and there is no bus service
..

Attachments: None

6166 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Ms Louise Milton [3485]

Summary:

I oppose the proposed housing development in the Vale of Glamorgan because I am concerned about the pressure it could place on local infrastructure and services. Roads in the area are already busy, and additional housing is likely to increase traffic and congestion. I am also worried about the loss of green space and the impact this could have on local wildlife and the rural character of the area. Schools, GP surgeries, and other services are already stretched, and without clear investment in infrastructure to support growth, this development risks reducing the quality of life for existing residents.

Full text:

I oppose the proposed housing development in the Vale of Glamorgan because I am concerned about the pressure it could place on local infrastructure and services. Roads in the area are already busy, and additional housing is likely to increase traffic and congestion. I am also worried about the loss of green space and the impact this could have on local wildlife and the rural character of the area. Schools, GP surgeries, and other services are already stretched, and without clear investment in infrastructure to support growth, this development risks reducing the quality of life for existing residents.

Attachments: None

6395 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mrs Claire Goulden [3569]
Petition: 2 petitioners

Summary:

We object to the following proposals in the ldp replacement plan. The first is no 367 south of Llantwit Major Road, Cowbridge and no 440 north of Church Road, Llanblethian on land of considerable historical importance encompassing the site of a large iron age settlement. No 367 overlooks a new estate of nearly 500 houses (still under construction) with no added amenities provided to the town of Cowbridge.

Full text:

We object to the following proposals in the ldp replacement plan. The first is no 367 south of Llantwit Major Road, Cowbridge and no 440 north of Church Road, Llanblethian on land of considerable historical importance encompassing the site of a large iron age settlement. No 367 overlooks a new estate of nearly 500 houses (still under construction) with no added amenities provided to the town of Cowbridge.

We object to developments nos 438 south of Church Road, Llanblethian and 440 north of Church Road, Llanblethian between the Cross Inn and the village. This small road is already a busy route used by vehicles avoiding Cowbridge High Street, it is no more than a country lane and has no pavements or lightning. Added development would also make the dangerous junction between Church Road and the B4270 at the Cross Inn even worse.

Attachments:

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

6407 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mrs Pamela Kay [3572]

Summary:

I would like to object to the development of the Bryn Melin field. Other sites (e.g 455 and 367) seem better suited to development as they have better access/transport links and already have adjacent suburban sprawl.

Full text:

I would like to object to the development of the Bryn Melin field (site 370, and adjoining sites 475 and 514)
This site is not as well suited as alternative sites (such as 455 and 367), and directly contravenes the placemaking goals and priorities of the area.
The site is within the thaw valley designated special landscape area and has uninterrupted views and access to nature. There is currently no development/suburban creep in this vicinity and developing here would destroy that. Other alternative sites (eg 455 and 367) appear better suited as they are already adjacent to suburban sprawl.
I am also particularly interested in astronomy. This area of Cowbridge, as it is a valley with no development, has significantly less light pollution than other more suburbanised areas. This is a valuable and a relatively rare resource so close to a town. Development here would destroy this.
I also do not feel the site is appropriate for a housing development. The site itself is very steep and the St Athan road is steep, narrow, with blind bends and no footpaths and no public transport. There is no easily accessible local access to jobs/amenities. Other sites (e.g 455 and 367) seem better suited to development as they have better access/transport links and already have adjacent suburban sprawl.
Please retain this site within open countryside and protect it for people to enjoy, for the wildlife and diversity that currently lives there, and to maintain the character of the area.

Attachments:

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

7219 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 367 Land South of Llantwit Major Road, Cowbridge / Tir i'r de o Llantwit Major Road, Y Bont-faen

Respondent: Mr Thomas Lewis [3743]

Summary:

I am writing regarding the current consultation for the Replacement Local Development Plan (RLDP), specifically the candidate sites proposed for housing development in the Rural Vale area near Cowbridge.

I would like to formally express my strong concern about the inclusion of several greenfield sites for large-scale housing development. In particular, I am referring to candidate sites 367 (land on the bank approaching Cowbridge), 438 and 440 (between Cross Inn and Llanblethian), and 455 (Primrose Hill).

These locations form part of the rural landscape that defines the character of the Vale of Glamorgan and the setting of Cowbridge. Large housing estates on these greenfield sites would risk causing permanent damage to the countryside, the natural environment, and the historic rural character that makes this area unique.

The Rural Vale is valued for its open farmland, biodiversity, and scenic views. Development on this scale would place significant pressure on local infrastructure, increase traffic on already limited rural roads, and contribute to the gradual erosion of the countryside surrounding the town.

Where housing development is required, priority should instead be given to brownfield sites and previously developed land. For this reason, I believe that the potential redevelopment of site 448 at Llandow Airfield is a far more appropriate option, as it makes use of existing developed land rather than sacrificing valuable greenfield countryside.

I respectfully urge the Council to reconsider the inclusion of these greenfield sites in the RLDP and to prioritise sustainable development that protects the Rural Vale's landscape, environment, and heritage.

Thank you for taking the time to consider this representation as part of the consultation process.

Full text:

I am writing regarding the current consultation for the Replacement Local Development Plan (RLDP), specifically the candidate sites proposed for housing development in the Rural Vale area near Cowbridge.

I would like to formally express my strong concern about the inclusion of several greenfield sites for large-scale housing development. In particular, I am referring to candidate sites 367 (land on the bank approaching Cowbridge), 438 and 440 (between Cross Inn and Llanblethian), and 455 (Primrose Hill).

These locations form part of the rural landscape that defines the character of the Vale of Glamorgan and the setting of Cowbridge. Large housing estates on these greenfield sites would risk causing permanent damage to the countryside, the natural environment, and the historic rural character that makes this area unique.

The Rural Vale is valued for its open farmland, biodiversity, and scenic views. Development on this scale would place significant pressure on local infrastructure, increase traffic on already limited rural roads, and contribute to the gradual erosion of the countryside surrounding the town.

Where housing development is required, priority should instead be given to brownfield sites and previously developed land. For this reason, I believe that the potential redevelopment of site 448 at Llandow Airfield is a far more appropriate option, as it makes use of existing developed land rather than sacrificing valuable greenfield countryside.

I respectfully urge the Council to reconsider the inclusion of these greenfield sites in the RLDP and to prioritise sustainable development that protects the Rural Vale's landscape, environment, and heritage.

Thank you for taking the time to consider this representation as part of the consultation process.

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4r5

5358 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 372 Meurig's Camping and Glamping / Meurig's Camping and Glamping

Respondent: Mr Thomas George [3242]

Summary:

The proposed use of this land as a glamping site raises serious concerns about both access and residential impact. The existing access is narrow and unsuitable for the increased traffic likely to be generated by visitors, service vehicles, and deliveries, creating potential safety and congestion issues. In addition, the site is located very close to established residential properties. Introducing short-term holiday accommodation in such proximity would likely lead to increased noise, disturbance, and loss of privacy, negatively affecting the amenity and character of the surrounding residential area.

Full text:

The proposed use of this land as a glamping site raises serious concerns about both access and residential impact. The existing access is narrow and unsuitable for the increased traffic likely to be generated by visitors, service vehicles, and deliveries, creating potential safety and congestion issues. In addition, the site is located very close to established residential properties. Introducing short-term holiday accommodation in such proximity would likely lead to increased noise, disturbance, and loss of privacy, negatively affecting the amenity and character of the surrounding residential area.

Attachments: None

5376 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 373 Cae Efail, Land off Llantwit Rd / Cae Efail, tir oddi ar Llantwit Rd

Respondent: Mr Gareth Thomas [2975]

Summary:

I object to the potential development of Site ID 373 Wick, within the RDLP process. While the Council has not taken this site forward for allocation in the Deposit Plan, I wish to record my objection should it be reconsidered at any later stage. Wick is a small rural settlement that has already experienced significant recent housing growth without corresponding expansion in services or infrastructure. Additional development on further greenfield sites would risk disproportionate expansion of the village and incremental erosion of its rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy.

Full text:

I formally object to the potential development of Site ID 373 Wick, identified during the RLDP candidate site process. Although this site has not been taken forward for allocation in the Deposit Plan, I wish to register this objection for the record should the site be reconsidered at any stage during the examination or future revisions to the Plan. For avoidance of doubt, I have recorded this as a ‘Comment’ rather than an ‘Objection’, as I do not object to the current decision not to take this site forward for further consideration.

Wick is a small rural settlement that has already experienced notable housing growth in recent years. While the provision of housing is recognised as important, development within smaller settlements must remain proportionate to the scale, function, and infrastructure capacity of the community. Wick has a limited service base and relies heavily on nearby towns for employment, healthcare, secondary education and many everyday services. Continued housing growth in such circumstances risks reinforcing unsustainable travel patterns and increasing reliance on private car journeys.

In this context, further development on additional greenfield sites around the village would represent incremental outward expansion of the settlement. Such expansion has the potential to erode the rural character of Wick and alter its historic form and relationship with the surrounding countryside. Development pressures on multiple edge-of-settlement sites, outside of the strategic growth area, would cumulatively change the scale and character of the village in a way that is disproportionate to its role within the settlement hierarchy.

Evidence prepared for the RLDP has already identified a range of sustainability and infrastructure considerations affecting development within the village. Where candidate sites have been assessed in detail, a number of environmental and infrastructure constraints have been identified. It is therefore reasonable to expect that similar issues would arise for other sites around the settlement unless robust evidence demonstrates otherwise.

For these reasons, further expansion of Wick through development on additional candidate sites would not represent proportionate or sustainable growth. Any reconsideration of Site ID 373 should therefore be resisted unless clear and robust evidence demonstrates that development would be consistent with the Plan’s spatial strategy, infrastructure capacity, and national sustainability objectives.

Attachments: None

5392 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 373 Cae Efail, Land off Llantwit Rd / Cae Efail, tir oddi ar Llantwit Rd

Respondent: Mrs Clair Thomas [3069]

Summary:

I object to the potential development of Site ID 355 Wick, within the RDLP process. While the Council has not taken this site forward for allocation in the Deposit Plan, I wish to record my objection should it be reconsidered at any later stage. Wick is a small rural settlement that has already experienced significant recent housing growth without corresponding expansion in services or infrastructure. Additional development on further greenfield sites would risk disproportionate expansion of the village and incremental erosion of its rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy.

Full text:

I formally object to the potential development of Site ID 355 Wick, identified during the RLDP candidate site process. Although this site has not been taken forward for allocation in the Deposit Plan, I wish to register this objection for the record should the site be reconsidered at any stage during the examination or future revisions to the Plan. For avoidance of doubt, I have recorded this as a 'Comment' rather than an 'Objection', as I do not object to the current decision not to take this site forward for further consideration.

Wick is a small rural settlement that has already experienced notable housing growth in recent years. While the provision of housing is recognised as important, development within smaller settlements must remain proportionate to the scale, function, and infrastructure capacity of the community. Wick has a limited service base and relies heavily on nearby towns for employment, healthcare, secondary education and many everyday services. Continued housing growth in such circumstances risks reinforcing unsustainable travel patterns and increasing reliance on private car journeys.

In this context, further development on additional greenfield sites around the village would represent incremental outward expansion of the settlement. Such expansion has the potential to erode the rural character of Wick and alter its historic form and relationship with the surrounding countryside. Development pressures on multiple edge-of-settlement sites, outside of the strategic growth area, would cumulatively change the scale and character of the village in a way that is disproportionate to its role within the settlement hierarchy.

Evidence prepared for the RLDP has already identified a range of sustainability and infrastructure considerations affecting development within the village. Where candidate sites have been assessed in detail, a number of environmental and infrastructure constraints have been identified. It is therefore reasonable to expect that similar issues would arise for other sites around the settlement unless robust evidence demonstrates otherwise.

For these reasons, further expansion of Wick through development on additional candidate sites would not represent proportionate or sustainable growth. Any reconsideration of Site ID 355 should therefore be resisted unless clear and robust evidence demonstrates that development would be consistent with the Plan's spatial strategy, infrastructure capacity, and national sustainability objectives.

Attachments: None

5359 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 375 Land at Pentre Meyrick / Tir ym Mhentremeurig

Respondent: Mr Thomas George [3242]

Summary:

The proposed use of this land as a glamping site raises serious concerns about both access and residential impact. The existing access is narrow and unsuitable for the increased traffic likely to be generated by visitors, service vehicles, and deliveries, creating potential safety and congestion issues. In addition, the site is located very close to established residential properties. Introducing short-term holiday accommodation in such proximity would likely lead to increased noise, disturbance, and loss of privacy, negatively affecting the amenity and character of the surrounding residential area.

Full text:

The proposed use of this land as a glamping site raises serious concerns about both access and residential impact. The existing access is narrow and unsuitable for the increased traffic likely to be generated by visitors, service vehicles, and deliveries, creating potential safety and congestion issues. In addition, the site is located very close to established residential properties. Introducing short-term holiday accommodation in such proximity would likely lead to increased noise, disturbance, and loss of privacy, negatively affecting the amenity and character of the surrounding residential area.

Attachments: None

4407 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 380 Land at Trepit Road, Wick / Tir yn Trepit Road, Y Wig

Respondent: Mr tim Blanch [1368]

Summary:

The development proposed is outside the existing settlement of wick and would represent an unacceptable incursion into the countryside. The only access to the proposed site is via Trepit rd, which is a single track road with passing places to the west, and to the north is effectively a single track rd because of parked cars, leading into either David St or Church st, both of which are narrow and already overloaded with traffic

Full text:

The development proposed is outside the existing settlement of wick and would represent an unacceptable incursion into the countryside. The only access to the proposed site is via Trepit rd, which is a single track road with passing places to the west, and to the north is effectively a single track rd because of parked cars, leading into either David St or Church st, both of which are narrow and already overloaded with traffic

Attachments: None

4445 Comment

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 380 Land at Trepit Road, Wick / Tir yn Trepit Road, Y Wig

Respondent: Mrs Jennifer Adams [2779]

Summary:

This is often underwater after heavy rain and is largely flood plain. Where would that water go instead?

Full text:

This is often underwater after heavy rain and is largely flood plain. Where would that water go instead?

Attachments: None

4845 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 380 Land at Trepit Road, Wick / Tir yn Trepit Road, Y Wig

Respondent: Mr Stuart Archer [2985]

Summary:

Object on the basis of access in and out of the proposed site and the poor links in to the rest of the existing housing adjacent to the site.

Full text:

Object on the basis of access in and out of the proposed site and the poor links in to the rest of the existing housing adjacent to the site.

Attachments: None

5012 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 380 Land at Trepit Road, Wick / Tir yn Trepit Road, Y Wig

Respondent: Mr Robert Davies [3074]

Summary:

The site conflicts with national planning policy and the RLDP's spatial strategy, promoting unsustainable and disproportionate growth that would harm Wick's rural character and setting. Development should prioritise brownfield or well-located sites near existing urban areas with suitable infrastructure. This proposal would damage Green Wedges and Green Infrastructure and represents unnecessary countryside development. It extends the settlement into open countryside, eroding its form and rural approach. Wick lacks the services, transport and infrastructure to support such growth, and local roads are constrained. The site would also create significant landscape and visual harm. It therefore fails key RLDP soundness tests.

Full text:

The site conflicts with national planning policy and the RLDP's spatial strategy, promoting unsustainable and disproportionate growth that would harm Wick's rural character and setting. Development should prioritise brownfield or well-located sites near existing urban areas with suitable infrastructure. This proposal would damage Green Wedges and Green Infrastructure and represents unnecessary countryside development. It extends the settlement into open countryside, eroding its form and rural approach. Wick lacks the services, transport and infrastructure to support such growth, and local roads are constrained. The site would also create significant landscape and visual harm. It therefore fails key RLDP soundness tests.

Attachments: None

5377 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 380 Land at Trepit Road, Wick / Tir yn Trepit Road, Y Wig

Respondent: Mr Gareth Thomas [2975]

Summary:

I object to the potential development of Site ID 380 Wick, within the RDLP process. While the Council has not taken this site forward for allocation in the Deposit Plan, I wish to record my objection should it be reconsidered at any later stage. Wick is a small rural settlement that has already experienced significant recent housing growth without corresponding expansion in services or infrastructure. Additional development on further greenfield sites would risk disproportionate expansion of the village and incremental erosion of its rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy.

Full text:

I formally object to the potential development of Site ID 380 Wick, identified during the RLDP candidate site process. Although this site has not been taken forward for allocation in the Deposit Plan, I wish to register this objection for the record should the site be reconsidered at any stage during the examination or future revisions to the Plan. For avoidance of doubt, I have recorded this as a 'Comment' rather than an 'Objection', as I do not object to the current decision not to take this site forward for further consideration.

Wick is a small rural settlement that has already experienced notable housing growth in recent years. While the provision of housing is recognised as important, development within smaller settlements must remain proportionate to the scale, function, and infrastructure capacity of the community. Wick has a limited service base and relies heavily on nearby towns for employment, healthcare, secondary education and many everyday services. Continued housing growth in such circumstances risks reinforcing unsustainable travel patterns and increasing reliance on private car journeys.

In this context, further development on additional greenfield sites around the village would represent incremental outward expansion of the settlement. Such expansion has the potential to erode the rural character of Wick and alter its historic form and relationship with the surrounding countryside. Development pressures on multiple edge-of-settlement sites, outside of the strategic growth area, would cumulatively change the scale and character of the village in a way that is disproportionate to its role within the settlement hierarchy.

Evidence prepared for the RLDP has already identified a range of sustainability and infrastructure considerations affecting development within the village. Where candidate sites have been assessed in detail, a number of environmental and infrastructure constraints have been identified. It is therefore reasonable to expect that similar issues would arise for other sites around the settlement unless robust evidence demonstrates otherwise.

For these reasons, further expansion of Wick through development on additional candidate sites would not represent proportionate or sustainable growth. Any reconsideration of Site ID 380 should therefore be resisted unless clear and robust evidence demonstrates that development would be consistent with the Plan's spatial strategy, infrastructure capacity, and national sustainability objectives.

Attachments: None

5388 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 380 Land at Trepit Road, Wick / Tir yn Trepit Road, Y Wig

Respondent: Mrs Clair Thomas [3069]

Summary:

I object to the potential development of Site ID 380 Wick, within the RDLP process. While the Council has not taken this site forward for allocation in the Deposit Plan, I wish to record my objection should it be reconsidered at any later stage. Wick is a small rural settlement that has already experienced significant recent housing growth without corresponding expansion in services or infrastructure. Additional development on further greenfield sites would risk disproportionate expansion of the village and incremental erosion of its rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy.

Full text:

I formally object to the potential development of Site ID 380 Wick, identified during the RLDP candidate site process. Although this site has not been taken forward for allocation in the Deposit Plan, I wish to register this objection for the record should the site be reconsidered at any stage during the examination or future revisions to the Plan. For avoidance of doubt, I have recorded this as a 'Comment' rather than an 'Objection', as I do not object to the current decision not to take this site forward for further consideration.

Wick is a small rural settlement that has already experienced notable housing growth in recent years. While the provision of housing is recognised as important, development within smaller settlements must remain proportionate to the scale, function, and infrastructure capacity of the community. Wick has a limited service base and relies heavily on nearby towns for employment, healthcare, secondary education and many everyday services. Continued housing growth in such circumstances risks reinforcing unsustainable travel patterns and increasing reliance on private car journeys.

In this context, further development on additional greenfield sites around the village would represent incremental outward expansion of the settlement. Such expansion has the potential to erode the rural character of Wick and alter its historic form and relationship with the surrounding countryside. Development pressures on multiple edge-of-settlement sites, outside of the strategic growth area, would cumulatively change the scale and character of the village in a way that is disproportionate to its role within the settlement hierarchy.

Evidence prepared for the RLDP has already identified a range of sustainability and infrastructure considerations affecting development within the village. Where candidate sites have been assessed in detail, a number of environmental and infrastructure constraints have been identified. It is therefore reasonable to expect that similar issues would arise for other sites around the settlement unless robust evidence demonstrates otherwise.

For these reasons, further expansion of Wick through development on additional candidate sites would not represent proportionate or sustainable growth. Any reconsideration of Site ID 380 should therefore be resisted unless clear and robust evidence demonstrates that development would be consistent with the Plan's spatial strategy, infrastructure capacity, and national sustainability objectives.

Attachments: None

4430 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Mrs Emily Ham [2769]

Summary:

I don't agree with any housing development sites to be built in our small rural village. There is no need for additional housing in this area at all. This would cause far more traffic through the village where we already have serious issues with traffic speeding, the safety of children and using our village as a short cut.

Full text:

I don't agree with any housing development sites to be built in our small rural village. There is no need for additional housing in this area at all. This would cause far more traffic through the village where we already have serious issues with traffic speeding, the safety of children and using our village as a short cut.

Attachments: None

4432 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Ms Beverley Peatling [2770]

Summary:

This is a small semi rural village with poor infrastructure and facilities that could not support additional growth. The access roads are narrow and already busy supporting the traffic that already uses them for access and for other journeys.
The planned development site would reduce the buffer between the existing housing and the new data centre which is being built which would be hugely detrimental and would undoubtedly increase noise, light and other pollution.
Any further development would severely impact on the quality of life of existing residents.

Full text:

This is a small semi rural village with poor infrastructure and facilities that could not support additional growth. The access roads are narrow and already busy supporting the traffic that already uses them for access and for other journeys.
The planned development site would reduce the buffer between the existing housing and the new data centre which is being built which would be hugely detrimental and would undoubtedly increase noise, light and other pollution.
Any further development would severely impact on the quality of life of existing residents.

Attachments: None

5516 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Mrs Francesca Dixon [3275]

Summary:

The scale of the proposed area to be allowed for development will overwhelm the small rural village community of Treoes. It is also in an area that is prone to flooding and all access into the village is along narrow rural roads. The Village of Treoes has few footpaths and the village narrows at several points which forces single file traffic and is dangerous to both pedestrians and cyclists.

Full text:

The scale of the proposed area to be allowed for development will overwhelm the small rural village community of Treoes. It is also in an area that is prone to flooding and all access into the village is along narrow rural roads. The Village of Treoes has few footpaths and the village narrows at several points which forces single file traffic and is dangerous to both pedestrians and cyclists.

Attachments: None

5578 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Mr Ian Richards [3301]

Summary:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Full text:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Attachments: None

5612 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Ms Ceindeg King [3308]

Summary:

Treoes is a lovely rural village but the traffic levels are already out of control with people using the village as a cut through. The roads are a mess and the constant flooding over winter causes widespread issues with the road for pedestrians. Adding more houses in the nant cana area will increase traffic. In addition the local schools are already oversubscribed and there are no local GP services or NHS dentists. There's also no walkable amenities so every additional house causes increased road traffic and environmental pollution.

Full text:

Treoes is a lovely rural village but the traffic levels are already out of control with people using the village as a cut through. The roads are a mess and the constant flooding over winter causes widespread issues with the road for pedestrians. Adding more houses in the nant cana area will increase traffic. In addition the local schools are already oversubscribed and there are no local GP services or NHS dentists. There's also no walkable amenities so every additional house causes increased road traffic and environmental pollution.

Attachments: None

5908 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Mr Howard Pearson [3423]

Summary:

I believe the small village with narrow roads cannot support more housing near Nant Canna due to frequent flooding of fields and the lane passing the proposed site, which worsens with heavy rain and climate change. The sewage system often floods after heavy rain, and the road infrastructure is unsuitable for increased traffic, with many roads lacking pavements, posing safety risks. The village has poor transport links, and the council refuses to litter pick on unpaved roads. I ask my objections be taken seriously.

Full text:

Our small village with its very narrow roads is not suitable for more houses to be built near Nant Canna. The field regularly floods, I have pics to support this, also the tiny lane that runs past your plan site also regularly floods and becomes in passable after heavy rain, something we can only expect more of with global warming. After heart rain the sewage system cannot cop and often floods on the roads in other parts of our village. The road structure around the village is not suitable for more vehicles, we don’t have a bus so poor transport links. Lots of areas of road are without pavements, this needs to be considered as it’s a safety risk. Even the council has told me they will not litter pick on roads without pavements due to the risks involved. I’d ask you take my objection very seriously. Thanks you for your time.

Attachments: None

5955 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Llangan Community Council (Clerk) [239]

Summary:

The sites are situated in the rural Vale, 7 miles from Cowbridge and 8 miles from Bridgend, surrounded by open countryside. The site's scale is uncharacteristic of the area, and residents would primarily rely on private cars to access work, shops, and schools, as public transport is unavailable to the nearest small shop in Pencoed. Access is via narrow single-lane country roads, unsuitable for high traffic volumes or emergency vehicles.

Full text:

The site are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops primary school in Llangan. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

6216 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Mrs Helen Hammond [3490]

Summary:

The scale of the site is completely out of character with the local area. there are limited facilities, no public transport or safe walking routes. the road through Treoes is already of concern for traffic and speeding and additional housing will make that worse. the lane has flooded many times in the winter.

Full text:

The site are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops primary school in Llangan. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.the road through Treoes is already of concern for traffic and speeding and additional housing will make that worse. the lane has flooded many times in the winter which is the main route to school and flooding is common right next to this site.

Attachments: None

6248 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 383 Land at Nant Canna, Treoes, Option 1 / Tir yn Nant Canna, Tre- os, Opsiwn 1

Respondent: Mrs Juliana Wines [3503]

Summary:

I note that the site is in rural Vale, far from towns and amenities, with a scale that is out of character with the area. Residents would need private cars for work, shopping, and school, as public transport is unavailable. The nearest shop is in Pencoed, requiring driving to Cowbridge or Bridgend for larger supermarkets. Access is via small single-lane country roads unsuitable for high traffic or emergency vehicles.

Full text:

The site is located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops primary school in Llangan. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

4449 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 386 Land at Hazelwood, Ogmore By Sea / Tir yn Hazelwood, Aberogwr

Respondent: Mr Rhys Jones [2782]

Summary:

The proposed housing development will fundamentally damage the village character of our community. We lack the necessary infrastructure and facilities to support such expansion, and the increased population will place unsustainable pressure on local services—particularly the school, which is already stretched beyond capacity

Full text:

The proposed housing development will fundamentally damage the village character of our community. We lack the necessary infrastructure and facilities to support such expansion, and the increased population will place unsustainable pressure on local services—particularly the school, which is already stretched beyond capacity

Attachments: None

4451 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 386 Land at Hazelwood, Ogmore By Sea / Tir yn Hazelwood, Aberogwr

Respondent: Mr Kevin Williams [2783]

Summary:

The likely access road off main road, onto Hazlewood / Crompton way is totally inadequate and a safety issue already at present, and parking along main road and around the junction is already dangerous.
The increase in traffic would add further safety issues.
The affordable/ social housing in the area has a great negative impact and increasing that element would further harm the exclusivity of the area.

Full text:

The likely access road off main road, onto Hazlewood / Crompton way is totally inadequate and a safety issue already at present, and parking along main road and around the junction is already dangerous.
The increase in traffic would add further safety issues.
The affordable/ social housing in the area has a great negative impact and increasing that element would further harm the exclusivity of the area.

Attachments:

4452 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 386 Land at Hazelwood, Ogmore By Sea / Tir yn Hazelwood, Aberogwr

Respondent: Miss Joanna Prescott [2784]

Summary:

The proposed development of more housing in of Ogmore-by-sea would be detrimental to the area and the community.The roads are already in poor condition and Ogmore lacks the infrastructure to support more residents.It would also put pressure on the local school which is already at capacity. An increase in the local services needed to support this development would also surely lead to further increases in council tax.We don’t need more of our green spaces destroyed. Residents choose to live here because of its location & size. We don’t need to turn the village into a town with no supporting infrastructure.

Full text:

The proposed development of more housing in of Ogmore-by-sea would be detrimental to the area and the community.The roads are already in poor condition and Ogmore lacks the infrastructure to support more residents.It would also put pressure on the local school which is already at capacity. An increase in the local services needed to support this development would also surely lead to further increases in council tax.We don’t need more of our green spaces destroyed. Residents choose to live here because of its location & size. We don’t need to turn the village into a town with no supporting infrastructure.

Attachments: None

4456 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 386 Land at Hazelwood, Ogmore By Sea / Tir yn Hazelwood, Aberogwr

Respondent: Mr Paul Rescott [2788]

Summary:

The proposed housing development will fundamentally damage our village. We lack the necessary infrastructure and facilities to support the expansion. The roads are in a terrible state, the schools are full. There would be unsustainable pressure on already under-delivered local services by the council.

Full text:

The proposed housing development will fundamentally damage our village. We lack the necessary infrastructure and facilities to support the expansion. The roads are in a terrible state, the schools are full. There would be unsustainable pressure on already under-delivered local services by the council.

Attachments: None

4450 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 389 Land at Three Golden Cups / Tir yn Three Golden Cups

Respondent: Mr Rhys Jones [2782]

Summary:

The proposed housing development will fundamentally damage the village character of our community. We lack the necessary infrastructure and facilities to support such expansion, and the increased population will place unsustainable pressure on local services—particularly the school, which is already stretched beyond capacity

Full text:

The proposed housing development will fundamentally damage the village character of our community. We lack the necessary infrastructure and facilities to support such expansion, and the increased population will place unsustainable pressure on local services—particularly the school, which is already stretched beyond capacity

Attachments: None

4455 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 389 Land at Three Golden Cups / Tir yn Three Golden Cups

Respondent: Laura Fletcher [2787]

Summary:

Development such as this in a rural hamlet would not be appropriate or in line with regional development plan strategy. The campsite is an important local facility, supporting tourism in the area. There are no other similar campsites available. There is already a problem with illegal wild camping that would worsen.

Full text:

Development such as this in a rural hamlet would not be appropriate or in line with regional development plan strategy. The campsite is an important local facility, supporting tourism in the area. There are no other similar campsites available. There is already a problem with illegal wild camping that would worsen.

Attachments: None

4548 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 389 Land at Three Golden Cups / Tir yn Three Golden Cups

Respondent: Ms Kim Fitzpatrick [2849]

Summary:

I believe that increasing housing in Southerndown would harm its status as an area of outstanding natural beauty, turning it into overpopulated and degraded like Ogmore by Sea. The existing campsite fosters community spirit, especially in summer, and benefits local businesses. It provides a valuable, affordable outdoor experience for visitors exploring the coast. The area is peaceful, and the upcoming development of the 'Old Blind Home' will be nearby. I oppose further housing due to concerns over sewage, flooding, increased noise, traffic, and litter, and believe the appeal should be rejected.

Full text:

Providing more housing to an area of outstanding beauty and no amenities would turn Southerndown into another overpopulated ruined area that happened to Ogmore by Sea. Having the existing camp site builds a community feel, especially throughout the summer months and adds a lot of business to our local restaurant and pubs. Having a campsite in a beautiful picturesque place like Southerndown is important for people and families from all over the UK to camp at reasonable rates and explore the coastline, the beaches and fields around. This is a peaceful hamlet. We already have the pending forthcoming development of the 'Old Blind Home', which will happen at some point and will be directly opposite the proposed campsite development. It will be a nightmare to add even more housing to this area. Where will the sewage go? The land behind the pub appears to be on a flood plain. This appeal must be stopped. More noise and traffic and litter to the community is not welcome.

Attachments: None

4549 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 389 Land at Three Golden Cups / Tir yn Three Golden Cups

Respondent: Mr Paul Hartmann [2848]

Summary:

This is a popular holiday destination, to build houses on a tourist attraction and campsite is not appropriate.
The campsite is unsafe for development as it is on a water course.
There is a development opposite this site in the old Blind Home which is suitable. The building of houses is not in keeping with the nature of the area, and is not "infill" land, it is spoiling an area of outstanding natural beauty, and a busy holiday destination.
To build in these rare areas of outstanding beauty is depriving future generations. Once gone it is lost forever.

Full text:

This is a popular holiday destination, to build houses on a tourist attraction and campsite is not appropriate.
The campsite is unsafe for development as it is on a water course.
There is a development opposite this site in the old Blind Home which is suitable. The building of houses is not in keeping with the nature of the area, and is not "infill" land, it is spoiling an area of outstanding natural beauty, and a busy holiday destination.
To build in these rare areas of outstanding beauty is depriving future generations. Once gone it is lost forever.

Attachments: None

4446 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 391 Land off Wick Road, Ewenny, Option 1 / Tir oddi ar Wick Road, Ewenni, Opsiwn 1

Respondent: Mrs Jennifer Adams [2779]

Summary:

This steep field which is visible for miles is unsuitable for a housing development. There is inadequate roads connecting this site to a main route and it would require further destruction of habitat to upgrade the road network, with parts unable to be widened due to adjoining property.

Full text:

This steep field which is visible for miles is unsuitable for a housing development. There is inadequate roads connecting this site to a main route and it would require further destruction of habitat to upgrade the road network, with parts unable to be widened due to adjoining property.

Attachments: None

4457 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 391 Land off Wick Road, Ewenny, Option 1 / Tir oddi ar Wick Road, Ewenni, Opsiwn 1

Respondent: Mr Paul Rescott [2788]

Summary:

The proposed housing development will fundamentally damage the village character of our community. The roads are far too narrow to cope with increased traffic. The local schools are full . The council are already under-delivering their services despite extortionate increases in council tax

Full text:

The proposed housing development will fundamentally damage the village character of our community. The roads are far too narrow to cope with increased traffic. The local schools are full . The council are already under-delivering their services despite extortionate increases in council tax

Attachments: None

4936 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 398 Land to north and west of westwinds business park, Llangan / Tir i'r gogledd ac i'r gorllewin o barc busnes Westwinds, Llan- gan

Respondent: Mrs Karen Jacobs [2746]

Summary:

Good use of brownfield

Full text:

Good use of brownfield

Attachments: None

6221 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 398 Land to north and west of westwinds business park, Llangan / Tir i'r gogledd ac i'r gorllewin o barc busnes Westwinds, Llan- gan

Respondent: Mrs Helen Hammond [3490]

Summary:

The scale of the site is out of character with the local area and very close to the houses Cherryacre & Westwind. It would surround these properties and block any rear views across open countryside. increased traffic is a concern where there is already speeding. there are no facilities, no public transport or safe walking routes.

Full text:

The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is out of character with the local area and very close to the houses Cherryacre & Westwind. It would surround these properties and block any rear views across open countryside. Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. The addition of more properties could also overload the small local school.

Attachments: None

6249 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 398 Land to north and west of westwinds business park, Llangan / Tir i'r gogledd ac i'r gorllewin o barc busnes Westwinds, Llan- gan

Respondent: Mrs Juliana Wines [3503]

Summary:

The site are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops etc. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Full text:

The site are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops etc. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

7090 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 398 Land to north and west of westwinds business park, Llangan / Tir i'r gogledd ac i'r gorllewin o barc busnes Westwinds, Llan- gan

Respondent: Mr Phil John [1119]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

We object to parts of this site being excluded from the settlement boundary as it appears incongruous when viewed in the context of the rest of the Fferm Goch settlement. It is deemed suitable for inclusion as it lies immediately to developed areas, local amenities and the adopted highway and therefore would round off the settlement in a logical manner. It would not propose back land development and is considered to be in line with the RLDP strategy and methodology of BP46 that ensure that settlements are drawn to logical defensible boundaries. Photo evidence provided shows the parcel displays characteristics that are not necessarily associated with open countryside and is regularly maintained. Designation as part of the SLA does not preclude its inclusion. It would allow for a small windfall opportunity in the future that is critical in sustaining the vitality of minor rural settlements.

Full text:

In summary the current settlement boundary of Fferm Goch is questioned under Policy SP2 Settlement Strategy. A revision to the minor rural settlement boundary of Fferm Goch is therefore proposed to allow the settlement boundary to follow criterion as set out in BP46; Settlement Boundary Review. The proposed change would allow the plan and meet the tests of soundness.

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our responses and include:

- Fit: Ensuring the plan is consistent with other plans, national policy, and relevant objectives.
- Appropriateness: Confirming that the plan is appropriate for the area based on evidence.
- Deliverability: Ensuring the plan is likely to be effective. The soundness of the LDP is assessed through a selfassessment by the Local Planning Authority (LPA) and then by an independent inspector.

SP2 Settlement Strategy and BP46 Settlement boundary Review Within BP 46 it is stated that the settlement boundaries separate the defined built up areas from the open countryside and are essential for managing development. The LDP aims to focus development within existing urban areas and restrict the scope of development in the countryside. The settlement boundaries are drawn to indicate where development is and is not considered acceptable albeit other material considerations will need to be considered. Planning Policy Wales (Edition 12 February 2024) (PPW) states: 'Planning authorities must prioritise the use of suitable and sustainable underutilised land and/or underutilised sites for all types of development and that when identifying sites in development plans, planning authorities should consider previously developed land and/or underutilised sites located within existing settlements in the first instance with sites on the edge of settlements considered at the next stage (para 3.43). The document goes on to state: 'Settlement boundaries play an important role in ensuring the delivery of sustainable development by encouraging development within the sustainable settlements. They also assist in protecting the surrounding undeveloped countryside from inappropriate development, in

line with national planning policy by delineating the extent of built development. With regard to the settlement boundaries BP46 states : 'The delineation of settlement boundaries therefore helps to support and reinforce the delivery of the Plan's objectives and strategy and provides a key policy mechanism for managing growth within the Vale of Glamorgan'. The purpose of settlement boundaries is to protect the countryside beyond and to delineate the extent of built developments. It is understood land located to the outside of the settlement boundaries will then be considered as countryside for planning purposes and treated as such in decision making. PPW confirms the national position on development outside of settlements and states: 'Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.' (Paragraph 3.60) BP46 Settlement Boundary Review, paragraph 3.5 and 3.6 sets out a methodology as follows: 3.6 Using these methods, the following methodology was followed:
• 1A Review the existing settlement boundaries for any anomalies.
• 1B Review the existing settlement boundaries to ensure that they logically follow building curtilages, where these have a functional relationship with existing dwellings.
• 1C Identify development completed since the 2016 Review adjacent to settlement boundaries.
• 1D Identify extant planning permission for housing or other appropriate built development adjacent to settlement boundaries.
• 1E Examine land uses immediately adjacent to the existing settlement boundaries and consider whether they lend themselves to being included within the settlement.
• 1F Ensure that the settlement boundary is drawn to logical defensible boundaries It is noted that the Fferm Goch settlement boundary has been amended from the position in the adopted LDP. The settlement boundary now includes:
• the parcel of land allocated for the affordable housing led site (HG4(4), Supported.
• the existing employment site of West Winds Business Park, Supported.
• the new housing to the south (Cwrt Canna), Supported.
• Llangan Primary school, Supported. Support is given to the changes to the settlement boundary to accommodate the RLDP allocation for rural led affordable housing (HG4(4), also for the inclusion of Westwinds business park and the immediate area to the south, some of which comprises brown field land. Support is also given to the inclusion of Cwrt Canna and Llangan Primary school all within the settlement boundary. Objection however is made, with particular reference to stated methodology 1 E and 1F of BP46 Settlement Boundary Review, in regard to the settlement boundary for the west of Fferm Goch where a parcel of circa 0.16 ha has been excluded from what would appear a logical inclusion in the settlement boundary. The reasons for the objection are stated below. The parcel of land that sits to the west of Cherry Acre should also brought in to the settlement boundary (Policy SP2 Settlement Strategy) for the following reasons: The inclusion is Logical in respect of the existing linear settlement pattern to both the north and south of the parcel in question. The exclusion of the parcel appears incongruous when viewed in the context of the rest of the Fferm Goch Settlement (see Plan below of blue line of proposed settlement boundary), particularly in view of the north western edge of the proposed settlement limit.
VOG RLDP proposed settlement boundary at Fferm Goch The 1.6 ha plot is deemed suitable for inclusion as it lies immediately adjacent to developed areas including a domestic dwelling to the east, West Winds Business Park to the north and a stable development to the west. Furthermore an adopted highway sits immediately to the south of the site together with the recently developed Cwrt Canna housing development (this recent development overlooks the parcel of land see photos below) on the other side of the road and Llangan Primary school located immediately south of Cwrt Canna.

Six images.
Given the surrounding development, comprising residential, B1/B2 Employment, on 3 sides of the parcel, it clearly represents an infill site that lends itself to round off the Fferm Goch settlement in a logical manner. The inclusion of the parcel within the settlement boundary would follow the defensible boundaries of the historic field pattern and consistent hedgeline to the west, and the adopted highway to the south and therefore would not propose back land development. The inclusion of the parcel is considered in line with the RLDP strategy and the methodology of BP46 criterion 1F, ensuing that the settlement boundary is drawn to logical defensible boundaries.
As drawn the exclusion of the parcel in question appears arbitrary as it follows the wooden fence to the north, the domestic curtilage of Cherry Acre to the east (a residential house developed in the 1980s), rather than the historic field boundary to the west and adopted highway to the south. The photos attached show the parcel to display characteristics that are not necessarily associated with open countryside and are clearly longstanding in terms of regular maintenance of the improved grassland and semi mature non native tree planting that is regimented rather than sporadic or organic in nature.
It is acknowledged that the parcel sits within the SLA however it is not widely visible given the existing development on 3 sides of the parcel (plus that of the allocation HG4(4) to the north). Designation as SLA does not preclude its inclusion within the settlement boundary and should development be sought in the future then it would need to be clearly proven that any development permitted would have no unacceptable harm on the important landscape characteristics of the area (BP 28 Special Landscape Areas: Upper and Lower Thaw Valley).
It is therefore proposed that the Fferm Goch settlement boundary is revised to include the small parcel to the west (located between the stable and Cherry Acre) that is currently shown outside of the settlement boundary. This proposal is a logical and consistent inclusion, especially when viewed in the context of the linear settlement of Fferm Goch and would allow for a small windfall opportunity in the future of a commensurate scale to the settlement. Small windfall sites

are critical in sustaining the vitality of minor rural settlements and supporting community cohesion and infrastructure such as the Community hall, sport pitch, equipped play area and Llangan primary school.
The minor adjustment to the settlement boundary would allow all the methodology of BP46Settlement Boundary Review to be applied and Test 2 of the Test of Soundness to be met in terms of 'appropriateness' and confirmation that the plan is appropriate for the area based on evidence.

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3h9

4422 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Mrs Louise Reed [2764]

Summary:
This is a rural area, and the proposed site is agricultural land that has been used as a green space for many years. There is no public transport locally, the primary school is at full capacity and there are few facilities nearby. Children will want to cross the road to access the park in Fferm Goch but the road is already particularly trouble with very few cars sticking to the 20mph limit - making it often a dangerous place for children.
All this considered, I feel there isn't the capacity or need for housing in such a rural area.

Full text:
This is a rural area, and the proposed site is agricultural land that has been used as a green space for many years. There is no public transport locally, the primary school is at full capacity and there are few facilities nearby. Children will want to cross the road to access the park in Fferm Goch but the road is already particularly trouble with very few cars sticking to the 20mph limit - making it often a dangerous place for children.
All this considered, I feel there isn't the capacity or need for housing in such a rural area.

Attachments: None

4424 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Helen Robbins [2765]

Summary:
Unacceptable loss of rural landscape, blocking of views to houses in timbers green and green goch

Full text:
Unacceptable loss of rural landscape, blocking of views to houses in timbers green and green goch

Attachments: None

4426 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Mr Michael Robbins [2766]

Summary:

I strongly object to this development. It will cause a permanent loss of rural views from Timbers Green and Fferm Goch, eroding the area's character. The increased traffic on our already congested roads poses a major safety concern. Crucially, the site is a vital habitat; we frequently observe Tawny Owls, Red Kites, hedgehogs, and foxes using the existing hedgerows. This development would result in a devastating loss of biodiversity and the destruction of a functioning ecosystem. Local infrastructure simply cannot sustain this expansion.

Full text:

I strongly object to this development. It will cause a permanent loss of rural views from Timbers Green and Fferm Goch, eroding the area's character. The increased traffic on our already congested roads poses a major safety concern. Crucially, the site is a vital habitat; we frequently observe Tawny Owls, Red Kites, hedgehogs, and foxes using the existing hedgerows. This development would result in a devastating loss of biodiversity and the destruction of a functioning ecosystem. Local infrastructure simply cannot sustain this expansion.

Attachments: None

4873 Comment

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Mr Edward Hunt [2995]

Summary:

The roads around this location aren't suitable to take more traffic. The main road which runs past the school is very high speed (despite it being 20mph) and there have been accidents on the corner of this development and the main road in the past. There must be mitigation put in place if building is to take place.

It looks as though this land wouldn't be used solely for affordable housing which is welcome.

Full text:

The roads around this location aren't suitable to take more traffic. The main road which runs past the school is very high speed (despite it being 20mph) and there have been accidents on the corner of this development and the main road in the past. There must be mitigation put in place if building is to take place.

It looks as though this land wouldn't be used solely for affordable housing which is welcome.

Attachments: None

5571 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Mr Ian Richards [3301]

Summary:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Full text:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Attachments: None

5588 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Mr David Hammond [1410]

Summary:

The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area and close by hamlet of Fferm Goch. Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Full text:

The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area and close by hamlet of Fferm Goch. Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

5715 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Mr Ian Tarr [3340]

Summary:

The sites are situated in the rural Vale, near Cowbridge and Bridgend, and are much larger than typical for the area. Residents would need private cars to access work, shopping, and services, as the local primary school is full and public transport is unavailable to nearby shops. Access is via narrow country roads unsuitable for heavy traffic or emergency vehicles.

Full text:

The sites are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school, which is full. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

5958 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Llangan Community Council (Clerk) [239]

Summary:

The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area and close by hamlet of Fferm Goch. Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Full text:

The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area and close by hamlet of Fferm Goch. Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

6220 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Mrs Helen Hammond [3490]

Summary:

The scale of the site is completely out of character with the local area, increased traffic is a concern where speeding is already a problem near to the school, there are no facilities nearby, no public transport or safe walkable routes to medical, shops etc.

Full text:

The site are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops primary school in Llangan. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services. this proposal will impact on the rural nature of the area being opposite to recent housing development it would make the area feel crowded. the traffic from the site would make the busy road even worse. speeding is already a problem there and increased traffic increases the risk of accidents. this site is noted as having historical significance, possibly iron age or earlier. the open nature of that site from history would be impacted negatively.

Attachments: None

6346 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 401 Land to the west of Fferm Goch House, Llangan / Tir i'r gorllewin o Fferm Goch House, Llan-gan

Respondent: Mr Richard Brian Antuch [3065]

Summary:

I find that the site conflicts with the RLDP's sustainable growth strategy, being poorly related to existing settlement patterns and risking fragmented expansion. It is in an unsustainable location with limited access to services and transport, increasing reliance on private cars. The site threatens the landscape, countryside, and settlement character, especially within valued landscape areas. Concerns also exist regarding placemaking quality, infrastructure capacity, and deliverability. Insufficient justification and the potential cumulative impacts further undermine its allocation, leading me to believe the site should be removed from the plan or the plan deemed unsound.

Full text:

1. Conflict with the RLDP Spatial Strategy
1.1 The RLDP's spatial strategy seeks to direct housing growth to sustainable locations, prioritising:
1.1.1 Well-connected settlements;
1.1.2 Locations with good access to services, facilities and employment; and
1.1.3 Development that reinforces, rather than undermines, settlement form.
1.2 The Site:
1.2.1 Is poorly related to the existing settlement patterns;
1.2.2 Represents an outward expansion that risks fragmented or dispersed growth; and
1.2.3 Does not clearly demonstrate how development would integrate with the existing built form in a manner consistent with the Plan's strategy.
1.3 The location of the site therefore undermines the RLDP's stated approach to sustainable growth and settlement hierarchy.

2. Unsustainable location and transport accessibility
2.1 Planning Policy Wales requires development to minimise the need to travel and to prioritise active travel and sustainable transport.
2.2 In respect of the Site:
2.2.1 There is insufficient evidence that the site is located within convenient walking distance of everyday services and facilities;
2.2.2 Public transport is essentially non-existent; and
2.2.3 Development would be likely to result in increased reliance on private car travel, contrary to the national policy and the VOG's climate objectives.
2.3 The RLDP evidence base does not robustly demonstrate that these sites can support genuine modal shift or deliver sustainable travel patterns.

3. Landscape, countryside and settlement character
3.1 The VOG is characterised by a sensitive and distinctive landscape, with clear settlement edges and areas of open countryside, contributing to local character.

3.2 The allocation of the Site would:
3.2.1 Result in the loss of undeveloped land that performs an important landscape and/ or settlement function;
3.2.2 Risk erosion of settlement identity through incremental outward expansion; and
3.2.3 Cause harm to the visual and rural setting of affected communities.
3.3 Where sites lie within or adjacent to Special Landscape Areas of valued countryside, national and local policy requires strong justification. That justification has not been demonstrated.

4. Failure to deliver high-quality placemaking
4.1 Placemaking is identified in the RLDP as a central objective. However, the Site raises significant concerns in this regard:
4.1.1 The location and constraints risk development that is peripheral, car-dominated and poorly integrated;
4.1.2 Opportunities to create walkable neighbourhoods with a strong sense of place appear limited; and
4.1.3 There is a real risk that development would result in standardised estate layouts, rather than distinctive, locally responsive places.
4.2 The evidence does not show that development on these sites could achieve the quality of placemaking required by the national policy and RLDP.

5. Infrastructure capacity and deliverability
5.1 For the Site to be soundly allocated, the VOG must demonstrate that they it is deliverable within the plan period and supported by appropriate infrastructure.
5.2 In relation to the Site:
5.2.1 There is insufficient clarity regarding highway capacity, safe access and mitigation;
5.2.2 Local services and facilities are already under pressure, with no firm delivery strategy identified;
5.2.3 The infrastructure implication of allocating multiple sites in proximity have not been adequately addressed (as there are other candidate sites close by, namely 398, 402, 403, 468, 2671, 4057 & 4068).
5.3 As such, the effectiveness and deliverability of the allocation is not demonstrated.

6. Failure to justify the need for the Site
6.1 The RLDP must show that the Site allocation is necessary, having regard to reasonable alternatives.
6.2 The evidence does not demonstrate that:
6.2.1 More suitable or less sensitive sites have been exhausted;
6.2.2 Previous development land opportunities have been prioritised to the extent required by national policy; or
6.2.3 The Site is required to meet identified housing need.
6.3 Without such justification, the allocation of the Site fails the tests of soundness.

7. Cumulative impact
7.1 When considered collectively with other candidate sites in close proximity to the Site (namely candidate sites 398, 402, 403, 468, 2671, 4057 & 4068), allocation of the Site would result in:
7.1.1 Excessive growth pressure on certain settlements;
7.1.2 Incremental erosion of countryside and landscape character; and
7.1.3 Development that is inconsistent with a plan-led, sustainable strategy.
7.2 The cumulative impacts have not been adequately assessed or addressed.

8. Conclusion
8.1 For the reasons set out above, the Site is:
8.1.1 Unsustainably located;
8.1.2 Likely to cause unacceptable harm to landscape and settlement character;
8.1.3 Inadequately supported by infrastructure and deliverability evidence; and
8.1.4 Not justified by housing need or the consideration of alternatives.
8.2 The Site should therefore be removed from the RLDP, or the Plan found unsound insofar as it relies upon its allocation.

Attachments:
Representation Form - https://valeofglamorgan.oc2.uk/a/txv

4421 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mrs Louise Reed [2764]

Summary:

The proposed site is agricultural land that has been used as a green space for many years. There is no public transport locally, the primary school is at full capacity, and the road is already particularly trouble with few cars sticking to the 20mph limit, making it often a dangerous place for children. The proximity to the school isn't ideal due to privacy for the children, and excess traffic during school hours (something that is already an issue) All this considered, I feel there isn't the capacity or need for housing in such a rural area.

Full text:

The proposed site is agricultural land that has been used as a green space for many years. There is no public transport locally, the primary school is at full capacity, and the road is already particularly trouble with few cars sticking to the 20mph limit, making it often a dangerous place for children. The proximity to the school isn't ideal due to privacy for the children, and excess traffic during school hours (something that is already an issue) All this considered, I feel there isn't the capacity or need for housing in such a rural area.

Attachments: None

4428 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mr Michael Robbins [2766]

Summary:

I strongly object to this development. Its proximity to the school creates unacceptable highway safety risks for children during peak hours. The loss of the surrounding rural landscape will deprive students of a vital nature-rich learning environment, negatively impacting their well-being. Furthermore, increased traffic idling near school gates raises serious air quality concerns. This "urban creep" destroys the school’s rural character and creates a hazardous, congested environment. The cumulative impact of these developments along a single road is unsustainable and endangers our community's children.

Full text:

I strongly object to this development. Its proximity to the school creates unacceptable highway safety risks for children during peak hours. The loss of the surrounding rural landscape will deprive students of a vital nature-rich learning environment, negatively impacting their well-being. Furthermore, increased traffic idling near school gates raises serious air quality concerns. This "urban creep" destroys the school’s rural character and creates a hazardous, congested environment. The cumulative impact of these developments along a single road is unsustainable and endangers our community's children.

Attachments: None

4871 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mr Edward Hunt [2995]

Summary:

While recognising the importance of affordable housing provision, the proposed concentration of tenure type in a small rural settlement risks undermining the objective of creating a genuinely mixed and balanced community.

Given the scale of Llangan as a rural village, the proportion of affordable housing proposed appears disproportionate when considered against overall settlement size and infrastructure capacity.

Although Felindre Road (past Llangan School) is 20mph, the reality is that it is a much higher speed road because there is no enforcement. Another junction onto the road will be an accident waiting to happen.

Full text:

While recognising the importance of affordable housing provision, the proposed concentration of tenure type in a small rural settlement risks undermining the objective of creating a genuinely mixed and balanced community.

Given the scale of Llangan as a rural village, the proportion of affordable housing proposed appears disproportionate when considered against overall settlement size and infrastructure capacity.

Although Felindre Road (past Llangan School) is 20mph, the reality is that it is a much higher speed road because there is no enforcement. Another junction onto the road will be an accident waiting to happen.

Attachments: None

5519 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mrs Francesca Dixon [3275]

Summary:

The site is located in a rural area of the Vale. There are already other developments along this road which would lead to ribbon development. There is no employment in the immediate vicinity which will lead to increased car usage as there is no bus service either.

Full text:

The site is located in a rural area of the Vale. There are already other developments along this road which would lead to ribbon development. There is no employment in the immediate vicinity which will lead to increased car usage as there is no bus service either.

Attachments: None

5569 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mr Ian Richards [3301]

Summary:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Full text:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Attachments: None

5714 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mr Ian Tarr [3340]

Summary:

The sites are situated in the rural Vale, near Cowbridge and Bridgend, with a scale that is out of character with the area. Residents would need private cars for most activities, as the primary school is full and public transport is unavailable to Pencoed. Access is via narrow country roads unsuitable for high traffic or emergency vehicles.

Full text:

The sites are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school, which is full. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

5957 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Llangan Community Council (Clerk) [239]

Summary:

I note that the site is too close to Llangan School, limiting its expansion and the school's capacity for additional children. Located in the rural Vale, 7 miles from Cowbridge and 8 miles from Bridgend, the site's scale conflicts with the local area's character. Residents will likely rely on private cars for commuting, shopping, and other needs, as public transport is unavailable, with the nearest shop in Pencoed. Access to larger supermarkets requires driving to Cowbridge or Bridgend.

Full text:

The site is too close to Llangan School and would prohibit the school from expanding its play area or car park. The school has limited capacity for additional children. The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

6214 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mrs Helen Hammond [3490]

Summary:

The site is too close to the school and will negatively impact on the children there, from the current rural nature of the site. this location is already busy with lots of car movements for the school and nearby housing. further development will create a dangerous risk to the children and parents at the school. there are no facilities near by and no public transport or safe walking routes. it is not a sustainable location for additional housing.

Full text:

The site is too close to Llangan School and would prohibit the school from expanding its play area or car park. The school has limited capacity for additional children. The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. The experience of the children in the school, to now be hemmed in by housing at either side, will be negatively impacted

Attachments: None

6229 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mrs Elana Farrant [2789]

Summary:

There is lack of infrastructure in the area to support housing. There are no bus routes, shops or amenities to support an increase in population.
This area already suffers a with a lot of surface water and poor drainage. More building on fields will worsen this situation further, and properties which are already at risk of flooding will be subjected to further risk.
The site borders a rural primary school, and further building will be disruptive to the children.
Any building would harm the intrinsic beauty of the local countryside, putting the delicate habitats of the surrounding hedgerows at risk.

Full text:

There is lack of infrastructure in the area to support housing. There are no bus routes, shops or amenities to support an increase in population.
This area already suffers a with a lot of surface water and poor drainage. More building on fields will worsen this situation further, and properties which are already at risk of flooding will be subjected to further risk.
The site borders a rural primary school, and further building will be disruptive to the children.
Any building would harm the intrinsic beauty of the local countryside, putting the delicate habitats of the surrounding hedgerows at risk.

Attachments: None

6246 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mrs Juliana Wines [3503]

Summary:

I believe the site is too close to Llangan School, preventing its expansion and limiting capacity for additional children. It is located in a rural area, 7 miles from Cowbridge and 8 miles from Bridgend, and its scale is out of character with the surroundings. Residents likely rely on private cars for travel, as there is no public transport to nearby amenities, with the nearest small shop in Pencoed and larger supermarkets requiring drives to Cowbridge or Bridgend.

Full text:

The site is too close to Llangan School and would prohibit the school from expanding its premises incl play area or car park. The school has limited capacity for additional children. The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

6331 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 402 Land adjacent to LLangan Primary School, LLangan / Tir ger Ysgol Gynradd Llan-gan, Llan-gan

Respondent: Mr Richard Brian Antuch [3065]

Summary:

I believe the site conflicts with the RLDP's strategy, being poorly related to existing settlement patterns and risking fragmented growth. Its location is unsustainable, with limited access to services and transportation, increasing reliance on private cars. The site would harm local landscape and settlement character, especially near valued countryside areas, and fails to support high-quality placemaking. Infrastructure issues and uncertain deliverability further undermine its suitability. Additionally, there is no clear justification for its need or consideration of alternative sites, and the cumulative impact of nearby sites would be detrimental.

Full text:

1. Conflict with the RLDP Spatial Strategy
1.1 The RLDP's spatial strategy seeks to direct housing growth to sustainable locations, prioritising:
1.1.1 Well-connected settlements;
1.1.2 Locations with good access to services, facilities and employment; and

1.1.3 Development that reinforces, rather than undermines, settlement form.
1.2 The Site:
1.2.1 Is poorly related to the existing settlement patterns;
1.2.2 Represents an outward expansion that risks fragmented or dispersed growth; and
1.2.3 Does not clearly demonstrate how development would integrate with the existing built form in a manner consistent with the Plan's strategy.
1.3 The location of the site therefore undermines the RLDP's stated approach to sustainable growth and settlement hierarchy.

2. Unsustainable location and transport accessibility
2.1 Planning Policy Wales requires development to minimise the need to travel and to prioritise active travel and sustainable transport.
2.2 In respect of the Site:
2.2.1 There is insufficient evidence that the site is located within convenient walking distance of everyday services and facilities;
2.2.2 Public transport is essentially non-existent; and
2.2.3 Development would be likely to result in increased reliance on private car travel, contrary to the national policy and the VOG's climate objectives.
2.3 The RLDP evidence base does not robustly demonstrate that these sites can support genuine modal shift or deliver sustainable travel patterns.

3. Landscape, countryside and settlement character
3.1 The VOG is characterised by a sensitive and distinctive landscape, with clear settlement edges and areas of open countryside, contributing to local character.
3.2 The allocation of the Site would:
3.2.1 Result in the loss of undeveloped land that performs an important landscape and/ or settlement function;
3.2.2 Risk erosion of settlement identity through incremental outward expansion; and
3.2.3 Cause harm to the visual and rural setting of affected communities.
3.3 Where sites lie within or adjacent to Special Landscape Areas of valued countryside, national and local policy requires strong justification. That justification has not been demonstrated.

4. Failure to deliver high-quality placemaking
4.1 Placemaking is identified in the RLDP as a central objective. However, the Site raises significant concerns in this regard:
4.1.1 The location and constraints risk development that is peripheral, car-dominated and poorly integrated;
4.1.2 Opportunities to create walkable neighbourhoods with a strong sense of place appear limited; and
4.1.3 There is a real risk that development would result in standardised estate layouts, rather than distinctive, locally responsive places.
4.2 The evidence does not show that development on these sites could achieve the quality of placemaking required by the national policy and RLDP.

5. Infrastructure capacity and deliverability
5.1 For the Site to be soundly allocated, the VOG must demonstrate that they it is deliverable within the plan period and supported by appropriate infrastructure.
5.2 In relation to the Site:
5.2.1 There is insufficient clarity regarding highway capacity, safe access and mitigation;
5.2.2 Local services and facilities are already under pressure, with no firm delivery strategy identified;
5.2.3 The infrastructure implication of allocating multiple sites in proximity have not been adequately addressed (as there are other candidate sites close by, namely 398, 401, 403, 2671 & 4057).
5.3 As such, the effectiveness and deliverability of the allocation is not demonstrated.

6. Failure to justify the need for the Site
6.1 The RLDP must show that the Site allocation is necessary, having regard to reasonable alternatives.
6.2 The evidence does not demonstrate that:
6.2.1 More suitable or less sensitive sites have been exhausted;
6.2.2 Previous development land opportunities have been prioritised to the extent required by national policy; or
6.2.3 The Site is required to meet identified housing need.
6.3 Without such justification, the allocation of the Site fails the tests of soundness.

7. Cumulative impact
7.1 When considered collectively with other candidate sites in close proximity to the Site (namely candidate sites 398, 401, 403, 2671 & 4057), allocation of the Site would result in:
7.1.1 Excessive growth pressure on certain settlements;
7.1.2 Incremental erosion of countryside and landscape character; and
7.1.3 Development that is inconsistent with a plan-led, sustainable strategy.
7.2 The cumulative impacts have not been adequately assessed or addressed.

8. Conclusion

8.1 For the reasons set out above, the Site is:
8.1.1 Unsustainably located;
8.1.2 Likely to cause unacceptable harm to landscape and settlement character;
8.1.3 Inadequately supported by infrastructure and deliverability evidence; and
8.1.4 Not justified by housing need or the consideration of alternatives.
8.2 The Site should therefore be removed from the RLDP, or the Plan found unsound insofar as it relies upon its allocation.

Attachments:
Representation Form - https://valeofglamorgan.oc2.uk/a/thk

4437 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mr Ian Husband [2776]

Summary:
Green belt land close to a conservation area that would completely change the nature of old Llangan and intrude on current residents, very poor choice of land

Full text:
Green belt land close to a conservation area that would completely change the nature of old Llangan and intrude on current residents, very poor choice of land

Attachments: None

4447 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Joanne Jenkins [2780]

Summary:
The proposed site is adjacent to existing residential housing in a small village with limited services, infrastructure, and public transport. The location is not sustainable and would increase reliance on private vehicles, contrary to national and local planning policies promoting sustainable development. There are already a family within the area which the village has accommodated for many years.

Full text:
The proposed site is adjacent to existing residential housing in a small village with limited services, infrastructure, and public transport. The location is not sustainable and would increase reliance on private vehicles, contrary to national and local planning policies promoting sustainable development. There are already a family within the area which the village has accommodated for many years.

Attachments: None

4507 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Joanne Jenkins [2780]

Summary:

I understand that this site has instead been identified for affordable housing. While I appreciate the need for such provision, I would like to raise concerns, as our village already accommodates a significant amount of affordable housing in close proximity, including developments at Timbers Green, Fferm Goch, and Canna (adjacent to the school). I therefore feel that Llangan has already made a substantial contribution in this regard.

Full text:

Thank you for your email.

It has since become apparent that the village WhatsApp group was incorrectly informed in suggesting that the land adjacent to Twchwyn Garth was being proposed as a traveller site. I understand that this site has instead been identified for affordable housing. While I appreciate the need for such provision, I would like to raise concerns, as our village already accommodates a significant amount of affordable housing in close proximity, including developments at Timbers Green, Fferm Goch, and Canna (adjacent to the school). I therefore feel that Llangan has already made a substantial contribution in this regard.

In relation to the existing Traveller site (Site 403), my understanding is that following a court case approximately five years ago, it was agreed that the family currently occupying this site would relocate further up the road to join the rest of their family. At that time, it was also agreed that the original site would be returned to the village of Llangan for use as allotments. This resolution followed considerable effort, distress, and financial contribution from local residents to resolve the matter.

I fully recognise and respect the need for Traveller families to have appropriate and secure places to live. However, I believe that Llangan has been more than accommodating to the existing families over many years, and I am concerned about the cumulative impact of further development on a small rural village with already limited infrastructure.

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/sgy

4872 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mr Edward Hunt [2995]

Summary:

While recognising the importance of affordable housing provision, the proposed concentration of tenure type in a small rural settlement risks undermining the objective of creating a genuinely mixed and balanced community.

Given the scale of Llangan as a rural village, the proportion of affordable housing proposed appears disproportionate when considered against overall settlement size and infrastructure capacity.

Affordable housing need should be addressed through a distributed model across sustainable settlements rather than concentrated in smaller rural villages where access to employment and services is limited.

Full text:

While recognising the importance of affordable housing provision, the proposed concentration of tenure type in a small rural settlement risks undermining the objective of creating a genuinely mixed and balanced community.

Given the scale of Llangan as a rural village, the proportion of affordable housing proposed appears disproportionate when considered against overall settlement size and infrastructure capacity.

Affordable housing need should be addressed through a distributed model across sustainable settlements rather than concentrated in smaller rural villages where access to employment and services is limited.

Attachments: None

5016 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mr Jonathan Vafidis [3081]

Summary:

Re403, land East of Llangan. This is low lying and hence often wet and flooded grazing pasture on the edge of the village. There are no amenities in the village and the local school is, I understand full. All four access lanes have at least two sections of single file road. Increasing traffic on these narrow and heavily pot holed lanes will create significant problems. There is strong local objection to this being developed.

Full text:

Re403, land East of Llangan. This is low lying and hence often wet and flooded grazing pasture on the edge of the village. There are no amenities in the village and the local school is, I understand full. All four access lanes have at least two sections of single file road. Increasing traffic on these narrow and heavily pot holed lanes will create significant problems. There is strong local objection to this being developed.

Attachments: None

5522 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Francesca Dixon [3275]

Summary:

The scale of the site is inappropriate for the small rural village of Llangan, which is a protected conservation area. There is no bus service or facilities in the village so all journeys will by necessity be made by car. Llangan village is on a hill as the whole area is extremely prone to flooding and very damp ground. The site is on lower ground where several streams join and often flood both the lane and the fields. All the lanes leading to the village flood.

Full text:

The scale of the site is inappropriate for the small rural village of Llangan, which is a protected conservation area. There is no bus service or facilities in the village so all journeys will by necessity be made by car. Llangan village is on a hill as the whole area is extremely prone to flooding and very damp ground. The site is on lower ground where several streams join and often flood both the lane and the fields. All the lanes leading to the village flood.

Attachments: None

5572 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mr Ian Richards [3301]

Summary:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Full text:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Attachments: None

5579 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mr David Hammond [1410]

Summary:

The site is located in the rural Vale, far from nearby towns and services, with the scale of development being out of character for the surrounding hamlet. Residents would depend on private cars for most needs, as the primary school is within walking distance but accessible via an unlit, pavements-free road. There are no public transport options to the nearest shop in Pencoed. Access is via narrow country roads unsuitable for high traffic or emergencies, and the area's C2 flooding zone makes construction unsuitable.

Full text:

The site is located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the close by hamlet of Llangan . Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school that is within walking distance via an unlit road with no pavements. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services. In addition, the area is a C2 flooding zone, making it unsuitable for building.

Attachments: None

5623 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Elana Farrant [2789]

Summary:

I strongly object to the proposed development of this field due to several concerns.
Our property is already at high risk of surface water flooding according to Natural Resources Wales, and building on the adjacent field would significantly increase runoff. The field is bordered by streams that have previously flooded.
Access is via a very narrow single track road unsuitable for large vehicles, and from Bridgend it requires crossing a clearly marked weight-restricted bridge near our home.
The field is also valuable agricultural grazing land, and development would damage the local countryside and surrounding hedgerow habitats.

Full text:

I strongly object to the proposed development of this field due to several concerns.
Our property is already at high risk of surface water flooding according to Natural Resources Wales, and building on the adjacent field would significantly increase runoff. The field is bordered by streams that have previously flooded.
Access is via a very narrow single track road unsuitable for large vehicles, and from Bridgend it requires crossing a clearly marked weight-restricted bridge near our home.
The field is also valuable agricultural grazing land, and development would damage the local countryside and surrounding hedgerow habitats.

Attachments:

twchwyngarthflood.jpg - https://valeofglamorgan.oc2.uk/a/t4s
weightrestrictedbridgellangan.jpg - https://valeofglamorgan.oc2.uk/a/t4t

5717 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mr Ian Tarr [3340]

Summary:

The sites are in the rural Vale, near Cowbridge and Bridgend, with a scale that does not fit the local area. Residents would rely on private cars for most needs, as the primary school is full and public transport is unavailable to nearby shops. Access is via small, single-lane country roads unsuitable for heavy traffic or emergency vehicles.

Full text:

The sites are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school, which is full. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

5960 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Llangan Community Council (Clerk) [239]

Summary:

The site is in rural Vale, 7 miles from Cowbridge and 8 miles from Bridgend, surrounded by open countryside. Its scale is out of character with nearby Llangan. Residents would rely on private cars for most needs, with limited local amenities and no public transport. Access is via narrow country roads unsuitable for high traffic or emergencies. The area is a C2 flooding zone, which makes it unsuitable for building. The primary school is within walking distance but has no pavements or lighting on the route.

Full text:

The site is located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the close by hamlet of Llangan . Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school that is within walking distance via an unlit road with no pavements. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services. In addition, the area is a C2 flooding zone, making it unsuitable for building.

Attachments: None

6110 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Elizabeth Davey [3476]

Summary:

I believe any development would be too large and unsustainable for Llangan village, especially given its size and the area's designation as a C2 flooding zone, making construction unsuitable. The sites are in rural Vale, far from towns like Cowbridge and Bridgend, and the scale conflicts with the local character. Residents would depend on private cars, as public transport is limited or unavailable, and access is via narrow country roads unsuitable for high traffic or emergency vehicles. The nearby primary school is full, further limiting local amenities.

Full text:

Any development would be too large and unsustainable compared to the size of Llangan village. In addition, the area is a C2 flooding zone, making it unsuitable for building.

The sites are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school, which is full. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

6167 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Dr Kathryn Ashton-Brown [3486]

Summary:

Access into the old llangan village is limited as is with the small single track lane into the village. Used as a through road through to bridgend so already too busy for the size of village. No amenities for new site.

Full text:

Access into the old llangan village is limited as is with the small single track lane into the village. Used as a through road through to bridgend so already too busy for the size of village. No amenities for new site.

Attachments: None

6195 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Angela Clewer [3492]

Summary:

The access road to llangan is very narrow.
Children often play in the culvert opposite this field - increased traffic will pose a threat to their safety.
I fear building on this filed would cause flooding

Full text:

The access road to llangan is very narrow.
Children often play in the culvert opposite this field - increased traffic will pose a threat to their safety.
I fear building on this filed would cause flooding

Attachments: None

6211 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Helen Hammond [3490]

Summary:

The scale of the site is completely out of character with the close by hamlet of Llangan. It would increase what is a small rural community by 300-400%. the RLDP acknowledges that Llangan is not a significant enough community to be able to bear such expansion. there are no local facilities, shops, health services meaning many additional car journeys that are polluting. there is not safe pedestrian access to the site to the school. there is a risk of flooding, particularly on the western end of the site and the ground is waterlogged for many months of the year.

Full text:

The site is located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the close by hamlet of Llangan . Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school that is within walking distance via an unlit road with no pavements. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services. In addition, the area is a C2 flooding zone, making it unsuitable for building.

Attachments: None

6218 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mr James Farrant [3402]

Summary:

I oppose the proposed housing development due to the high flood risk identified by Natural Resources Wales, particularly from surface water and nearby streams. The site's existing sewage pumping station releases storm overflow, and flooding has occurred on adjacent streams. Vehicle access poses safety concerns, especially with narrow roads and a weight-restricted bridge near my property. The field is an important agricultural grazing asset and its development would damage the local countryside and habitats. Additionally, there is insufficient local infrastructure to support new residents.

Full text:

I strongly object to the proposed site being used for housing.
This is due to:
- Significant flooding risk to our home and to others. Natural Resources Wales have deemed the property's at Twchwyn Garth, CF35 5EF at "high risk of flooding from surface water and small watercourses". Building on the field immediately next to our property would significantly increase surface water volume.
- The sewage pumping station located on the land already releases storm water overflow into the Nant ganna at times of heavy rainfall.
- The field has streams on two of its borders, both of which have previously flooded.
- Safety concerns over vehicle access to the field as it is down a single track road which is far too narrow for any large vehicles.
- Access from the Bridgend direction would also be over a clearly marked "weight restricted" bridge. This bridge is very close to our property and any damage to it could put our house at structural risk.
- The field is an agricultural asset for grazing
- Any building would harm the intrinsic beauty of the local countryside, also putting the delicate habitats of the surrounding hedgerows at risk.
- there is no local infrastructure to support additional housing in terms of shops, cafes, play areas, transport links.

Attachments: None

6230 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Janet Reed OBE [3269]

Summary:

The site should be removed from the RLDP- it is on a flood plane, access is down a single track road that is already congested at certain times. There is no footpath or street lighting. There are no local amenities and nearest medical facilities, shops etc are some 5 miles away , there is no public transport. Homeowners will have to drive everywhere. Generally the infra structure including sewage removal will need substantial upgrading. There are no play areas for children close to this site.

The site contradicts many of the VOG's own policies .

Full text:

The site should be removed from the RLDP- it is on a flood plane, access is down a single track road that is already congested at certain times. There is no footpath or street lighting. There are no local amenities and nearest medical facilities, shops etc are some 5 miles away , there is no public transport. Homeowners will have to drive everywhere. Generally the infra structure including sewage removal will need substantial upgrading. There are no play areas for children close to this site.

The site contradicts many of the VOG's own policies .

Attachments: None

6233 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Ruth Williams [3324]

Summary:

o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
The primary school is already at capacity.
The village is in a rural area and further development on Green land risks this important area and negatively impacts the countryside.

Full text:

o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
The primary school is already at capacity.
The village is in a rural area and further development on Green land risks this important area and negatively impacts the countryside.

Attachments: None

6242 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mrs Carol Simpson [3501]

Summary:

403 Land east of Llangan. Unsuitable for development due to flooding potential. This is a constant concern for residents adjacent to proposed site. Further stress on local infrastructure particularly drains, roads, school places , lack of public transport.

Full text:

403 Land east of Llangan. Unsuitable for development due to flooding potential. This is a constant concern for residents adjacent to proposed site. Further stress on local infrastructure particularly drains, roads, school places , lack of public transport.

Attachments: None

6326 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 403 Land east of Llangan / Tir i'r dwyrain o Lan-gan

Respondent: Mr Richard Brian Antuch [3065]

Summary:

I believe the site conflicts with the RLDP's sustainable growth strategy, being poorly related to existing settlement patterns and risking fragmented development. It is in an unsustainable location with limited access to services and public transport, increasing reliance on cars. The site would harm the landscape, countryside, and settlement identity. It fails to deliver high-quality placemaking, lacks sufficient infrastructure support, and cannot be justified as necessary or the best alternative. Cumulative impacts of nearby sites would worsen growth pressures and landscape erosion. Therefore, I consider the site unsuitable for allocation in the RLDP.

Full text:

1. Conflict with the RLDP Spatial Strategy
1.1 The RLDP's spatial strategy seeks to direct housing growth to sustainable locations, prioritising:
1.1.1 Well-connected settlements;
1.1.2 Locations with good access to services, facilities and employment; and
1.1.3 Development that reinforces, rather than undermines, settlement form.
1.2 The Site:
1.2.1 Is poorly related to the existing settlement patterns;
1.2.2 Represents an outward expansion that risks fragmented or dispersed growth; and
1.2.3 Does not clearly demonstrate how development would integrate with the existing built form in a manner consistent with the Plan's strategy.
1.3 The location of the site therefore undermines the RLDP's stated approach to sustainable growth and settlement hierarchy.

2. Unsustainable location and transport accessibility
2.1 Planning Policy Wales requires development to minimise the need to travel and to prioritise active travel and sustainable transport.
2.2 In respect of the Site:
2.2.1 There is insufficient evidence that the site is located within convenient walking distance of everyday services and facilities;
2.2.2 Public transport is essentially non-existent; and
2.2.3 Development would be likely to result in increased reliance on private car travel, contrary to the national policy and the VOG's climate objectives.
2.3 The RLDP evidence base does not robustly demonstrate that these sites can support genuine modal shift or deliver sustainable travel patterns.

3. Landscape, countryside and settlement character
3.1 The VOG is characterised by a sensitive and distinctive landscape, with clear settlement edges and areas of open countryside, contributing to local character.
3.2 The allocation of the Site would:
3.2.1 Result in the loss of undeveloped land that performs an important landscape and/ or settlement function;
3.2.2 Risk erosion of settlement identity through incremental outward expansion; and
3.2.3 Cause harm to the visual and rural setting of affected communities.
3.3 Where sites lie within or adjacent to Special Landscape Areas of valued countryside, national and local policy requires strong justification. That justification has not been demonstrated.

4. Failure to deliver high-quality placemaking
4.1 Placemaking is identified in the RLDP as a central objective. However, the Site raises significant concerns in this regard:
4.1.1 The location and constraints risk development that is peripheral, car-dominated and poorly integrated;
4.1.2 Opportunities to create walkable neighbourhoods with a strong sense of place appear limited; and
4.1.3 There is a real risk that development would result in standardised estate layouts, rather than distinctive, locally responsive places.
4.2 The evidence does not show that development on these sites could achieve the quality of placemaking required by the national policy and RLDP.

5. Infrastructure capacity and deliverability
5.1 For the Site to be soundly allocated, the VOG must demonstrate that they it is deliverable within the plan period and supported by appropriate infrastructure.
5.2 In relation to the Site:
5.2.1 There is insufficient clarity regarding highway capacity, safe access and mitigation;
5.2.2 Local services and facilities are already under pressure, with no firm delivery strategy identified;
5.2.3 The infrastructure implication of allocating multiple sites in proximity have not been adequately addressed (as there are other candidate sites close by, namely 398, 401, 402, 468, 2671 & 4068).
5.3 As such, the effectiveness and deliverability of the allocation is not demonstrated.

6. Failure to justify the need for the Site
6.1 The RLDP must show that the Site allocation is necessary, having regard to reasonable alternatives.
6.2 The evidence does not demonstrate that:
6.2.1 More suitable or less sensitive sites have been exhausted;
6.2.2 Previous development land opportunities have been prioritised to the extent required by national policy; or
6.2.3 The Site is required to meet identified housing need.
6.3 Without such justification, the allocation of the Site fails the tests of soundness.

7. Cumulative impact
7.1 When considered collectively with other candidate sites in close proximity to the Site (namely candidate sites 398, 401, 402, 468, 2671 & 4068), allocation of the Site would result in:
7.1.1 Excessive growth pressure on certain settlements;
7.1.2 Incremental erosion of countryside and landscape character; and
7.1.3 Development that is inconsistent with a plan-led, sustainable strategy.
7.2 The cumulative impacts have not been adequately assessed or addressed.

8. Conclusion
8.1 For the reasons set out above, the Site is:
8.1.1 Unsustainably located;
8.1.2 Likely to cause unacceptable harm to landscape and settlement character;
8.1.3 Inadequately supported by infrastructure and deliverability evidence; and
8.1.4 Not justified by housing need or the consideration of alternatives.
8.2 The Site should therefore be removed from the RLDP, or the Plan found unsound insofar as it relies upon its allocation.

Attachments:
Representation Form - https://valeofglamorgan.oc2.uk/a/thg

4415 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 405 Land at Waun Gron, Ystradowen / Tir yn Waun Gron, Ystradowen

Respondent: Mr Alex Crockett [2760]

Summary:
I object to the proposed housing allocation in Ystradowen as it is unsustainable and unsupported by infrastructure. Public transport provision is wholly inadequate, with only one bus service approximately every two hours and no train station, forcing total reliance on private cars. The narrow rural road network already experiences congestion and safety issues and cannot accommodate increased traffic. Local schools are at or near capacity, with no clear plans for additional places. The village also lacks sufficient play areas, medical provision, and community infrastructure. Further development would erode Ystradowen's rural character and conflict with sustainability and climate objectives.

Full text:
I object to the proposed housing allocation in Ystradowen as it is unsustainable and unsupported by infrastructure. Public transport provision is wholly inadequate, with only one bus service approximately every two hours and no train station, forcing total reliance on private cars. The narrow rural road network already experiences congestion and safety issues and cannot accommodate increased traffic. Local schools are at or near capacity, with no clear plans for additional places. The village also lacks sufficient play areas, medical provision, and community infrastructure. Further development would erode Ystradowen's rural character and conflict with sustainability and climate objectives.

Attachments: None

4441 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 409 Land adjacent to Waterton Lodge, Colwinston / Tir cyfagos i Waterton Lodge, Tregolwyn

Respondent: Mr Tom Prosser [2778]

Summary:
The village lacks severe infrastructure to accommodate this type of development

Full text:
The village lacks severe infrastructure to accommodate this type of development

Attachments: None

4545 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 409 Land adjacent to Waterton Lodge, Colwinston / Tir cyfagos i Waterton Lodge, Tregolwyn

Respondent: Mr Rob G Thomas [683]

Summary:

Parcel 409 site would have a substantial impact and intrusion into the open Countryside, being detrimental and with increased contribution to climate change .

No indication of Market or Affordable led inclusion.

NO DVM supplied.

NO Active travel supported.

Loss of BVM under ALC Wales Classification.

No site access suitable unless unacceptable demolition or new creation applied that would severely impact existing properties and highway.

Full text:

Parcel 409 site would have a substantial impact and intrusion into the open Countryside, being detrimental and with increased contribution to climate change .

No indication of Market or Affordable led inclusion.

NO DVM supplied.

NO Active travel supported.

Loss of BVM under ALC Wales Classification.

No site access suitable unless unacceptable demolition or new creation applied that would severely impact existing properties and highway.

Attachments: None

4929 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 409 Land adjacent to Waterton Lodge, Colwinston / Tir cyfagos i Waterton Lodge, Tregolwyn

Respondent: Mrs Karen Jacobs [2746]

Summary:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Full text:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Attachments: None

6866 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 409 Land adjacent to Waterton Lodge, Colwinston / Tir cyfagos i Waterton Lodge, Tregolwyn

Respondent: Mr Andrew Raymond [1170]

Agent: Boyer Planning

Summary:

Land adjacent to Waterton Lodge, Colwinston represents a sustainable and deliverable opportunity for modest residential development which could contribute positively towards the Plan's housing supply. The site is located adjacent to the existing settlement and is well related to the current built form. Development in this location would represent a logical and contained extension to the village, rather than an isolated incursion into open countryside.

The Stage 2 Register cites "unacceptable intrusion into the open countryside". However, the site directly adjoins existing dwellings at Waterton Lodge and mature boundary hedgerows; development here would constitute rounding-off rather than isolated sprawl. A strong landscape framework already exists, and additional planting could reinforce defensible boundaries.

The Council refers to "major highways constraints" but no evidence highway assessment has been published by the Authority. A preliminary review confirms that safe vehicular access can be achieved from the adjoining local highway with modest engineering works and that the scale envisaged would generate limited traffic, well within local-road capacity.

The site lies within walking distance of Colwinston's core facilities (village hall, public house, bus stops), enabling sustainable travel choices for residents. Development at a scale that represents proportionate growth for Colwinston can be provided and would be entirely consistent with the "limited expansion" envisaged for minor rural settlements under PPW and the RLDP.

The land is semi-improved grassland with no statutory designations. Preliminary review indicates no SINC coverage or protected species constraints. Detailed ecological and agricultural-land surveys can be provided to confirm that any residual impacts are minor and capable of full mitigation. Development can achieve net biodiversity gain through buffer planting, sustainable drainage and native-hedgerow reinforcement, fully consistent with PPW and RLDP environmental objectives. The site is available and deliverable early in the plan period.

Full text:

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

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

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

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

The principle of directing development to sustainable settlements is supported. However, limiting development opportunities exclusively within the Strategic Growth Area is not considered to represent the most balanced or flexible spatial strategy. Greater flexibility should be introduced to allow appropriate small-scale allocations within sustainable rural settlements.

In this context, Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a sustainable opportunity for a modest residential development that would align with the scale and character of the settlement. The site lies

adjacent to existing built form and would represent a logical and contained extension to the village.
SP2: Settlement Hierarchy

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

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

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

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

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

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

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

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

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

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

In this context, it is considered that the Vale of Glamorgan RLDP should incorporate a flexibility allowance of at least 15%. This would provide additional resilience within the housing trajectory and reduce reliance on a limited number of larger strategic allocations.
Smaller sites such as Candidate Site 409 at Waterton Lodge, Colwinston are particularly valuable in this context. Smaller sites are typically:

• More deliverable in the short term
• Less dependent on major infrastructure investment
• Capable of contributing to early housing delivery
• Able to increase overall build-out rates
Such sites can therefore play an important role in supporting the delivery of the Plan's housing requirement and enhancing flexibility within the supply.

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

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

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

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

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

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

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

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

HG4 – Affordable Housing Allocations
It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, and in particular within Colwinston HG4 (1) – Land to the East of Colwinston for 25 units. In the context of Policy HG4 they will be affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing. This is to meet the affordable housing needs of the local community. Mr Raymond has no objection in principle to this but does object to the fact that there is no other development opportunities recognised in Colwinston (despite it being sustainably located on the A48).

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

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

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

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

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

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

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

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

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

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

Deposit Plan Considerations
Settlement Boundary

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

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

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

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

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

Turning to the main reasons the site was not taken forward Mr Raymond provides the following response:
(a) Alleged intrusion into the open countryside
The Stage 2 Register cites "unacceptable intrusion into the open countryside". Mr Raymond submits that this conclusion fails to reflect the site's physical containment and relationship to the built form.
• The site directly adjoins existing dwellings at Waterton Lodge and mature boundary hedgerows; development here would constitute rounding-off rather than isolated sprawl.
• A strong landscape framework already exists, and additional planting could reinforce defensible boundaries.
Accordingly, the site's development would not materially extend the settlement into open countryside or harm landscape character, consistent with PPW paragraph 3.60.
(b) Highways and accessibility constraints
The Council refers to "major highways constraints" but no evidence highway assessment has been published by the Authority. Mr Raymond's preliminary review confirms that safe vehicular access can be achieved from the adjoining local highway with modest engineering works and that the scale envisaged would generate limited traffic, well within local-road capacity.

Future submission of a Transport Statement can demonstrate compliance with PPW (Section 5: Active and Socially Just Places) and LDP Policy MD2 (criteria 6 and 8).
The site lies within walking distance of Colwinston's core facilities (village hall, public house, bus stops), enabling sustainable travel choices for residents.
(c) Scale of development
Development at a scale that represents proportionate growth for Colwinston can be provided and would be entirely consistent with the "limited expansion" envisaged for minor rural settlements under PPW and the RLDP.
This level of growth would strengthen local demographics, support the rural housing supply and modestly contribute to the Vale's overall housing requirement, without exceeding infrastructure capacity.
(d) Ecology, landscape and agricultural land classification
The land is semi-improved grassland with no statutory designations. Preliminary review indicates no SINC coverage or protected species constraints. Detailed ecological and agricultural-land surveys can be provided to confirm that any residual impacts are minor and capable of full mitigation.

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

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

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

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

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

7132 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 411 Argoed Isha Quarry / Chwarel Argoed Isha
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:
The approach in MIN1 is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.
If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.
Argoed Isha is capable of being assessed under the type of modern policy framework in MIN4.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.

Full text:
REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD
1. Introduction
These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.
The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those

reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.
The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.
2. Site context and planning status
Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".
The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.
3. Soundness and the role of evidence
The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.
Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.
4. National policy context – Planning Policy Wales
Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.
PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that "It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working" and adds that, where sites have been inactive and "there is no prospect of future working", authorities should consider the use of prohibition orders.
That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.
PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that "Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction

is likely to be acceptable" and that policies and proposals should cover mineral resources "which are currently used or which may need to be used in the foreseeable future". It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.

The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.

5. National policy context – MTAN1

MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and count these as "dormant reserves" to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture is obtained of permitted reserves "that are likely to have real potential for future working".

That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple "no allocation required" conclusion.

MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.

6. Apportionment and Plan Period

The regional and sub-regional evidence does not undermine the respondent's case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.

BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.

Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance.

The respondent's case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.

7. BP25 – the Council's own minerals evidence

BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.

Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph

5.51 states: “While Argoed Isha quarry is classified as ‘dormant’, useable reserves remain at the site and could be extracted if required.” It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: “While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change.”

That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent’s submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent’s case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that “Caution must be exercised in using these landbank figures” because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event “dormant reserves must be counted separately”.

That evidence materially supports the respondent’s case. It shows that the statement “no further allocations are specifically required” is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council’s candidate site assessment

The Council’s candidate site assessment records that a positive allocation for mineral working is not included because “the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP”. That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect “real possibilities for future mineral working” and that prohibition orders are appropriate where there is “no prospect of future working”. MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve “A more realistic landbank assessment”. SWRAWP says that “Caution must be exercised” in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent’s submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan’s supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that “Caution must be exercised in using these landbank figures” because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply.

10. The existing temporary training permission does not sterilise the reserve

BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016

and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.

In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.

11. Benefits of continued extraction at Argoed Isha Quarry

Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.

The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.

Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an "important supplier of Carboniferous limestone for general aggregate use". In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.

The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.

Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.

A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.

Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.

The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.

There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect "real possibilities for future mineral working". Positive recognition of the benefits of continued extraction at Argoed Isha is therefore

entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.

12. Restoration, aftercare and biodiversity gain

The respondent's case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.

PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.

Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.

13. Overall conclusion

The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.

PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.

Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.

14. Summary

These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.

 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.

The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.

 Policy MIN1 – Mineral Safeguarding Areas: Support.

This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.

That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.

 Policy MIN2 – Quarry Buffer Zones: Support.

The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.

 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.

The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.

 Policy MIN4 – Sustainable Mineral Working: Support in principle.

The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.

 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach:

Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework.
The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

Attachments:
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

4416 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 430 Land at Ystradowen / Tir yn Ystradowen

Respondent: Mr Alex Crockett [2760]

Summary:
I object to the proposed housing allocation in Ystradowen as it is unsustainable and unsupported by infrastructure. Public transport provision is wholly inadequate, with only one bus service approximately every two hours and no train station, forcing total reliance on private cars. The narrow rural road network already experiences congestion and safety issues and cannot accommodate increased traffic. Local schools are at or near capacity, with no clear plans for additional places. The village also lacks sufficient play areas, medical provision, and community infrastructure. Further development would erode Ystradowen's rural character and conflict with sustainability and climate objectives.

Full text:
I object to the proposed housing allocation in Ystradowen as it is unsustainable and unsupported by infrastructure. Public transport provision is wholly inadequate, with only one bus service approximately every two hours and no train station, forcing total reliance on private cars. The narrow rural road network already experiences congestion and safety issues and cannot accommodate increased traffic. Local schools are at or near capacity, with no clear plans for additional places. The village also lacks sufficient play areas, medical provision, and community infrastructure. Further development would erode Ystradowen's rural character and conflict with sustainability and climate objectives.

Attachments: None

4551 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 430 Land at Ystradowen / Tir yn Ystradowen

Respondent: Mr Tim Rich [1281]

Summary:

Object due to already overwhelmed and inferior infrastructure. Oversubscribed local Schools, poorly maintained and overused country lanes, poor public transport, few amenities.

Full text:

Object due to already overwhelmed and inferior infrastructure. Oversubscribed local Schools, poorly maintained and overused country lanes, poor public transport, few amenities.

Attachments: None

4538 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Mr Steven Thomas [2845]

Summary:

I remind the Vale Council planners that, in the VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036 CANDIDATE SITES ASSESSMENT AT DEPOSIT PLAN STAGE November 2025, it was stated that this site (ref 438) was not allocated "as the site would represent unacceptable intrusion into the local countryside. The site is located on the outskirts of Cowbridge and not conveniently situated for walking, cycling or public transport accessability".

Full text:

I remind the Vale Council planners that, in the VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036 CANDIDATE SITES ASSESSMENT AT DEPOSIT PLAN STAGE November 2025, it was stated that this site (ref 438) was not allocated "as the site would represent unacceptable intrusion into the local countryside. The site is located on the outskirts of Cowbridge and not conveniently situated for walking, cycling or public transport accessability".

Attachments: None

5122 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Llywelyn Lehnert [3133]

Summary:

Vale Council planners are reminded that in November 2025 they stated this site was not allocated "as the site would represent unacceptable intrusion into the local countryside' (the Vale of Glamorgan Replacement Local Development plan 2021-2036 candidate sites assessment at deposit plan stage) November 2025). The site is located on the outskirts of Cowbridge and not conveniently situated for walking, cycling or public transport accessibility. Since that decision, further pressures on the extremely limited public transport and nearby roads more generally make this site unsuitable for development.

Full text:

Vale Council planners are reminded that in November 2025 they stated this site was not allocated "as the site would represent unacceptable intrusion into the local countryside' (the Vale of Glamorgan Replacement Local Development plan 2021-2036 candidate sites assessment at deposit plan stage) November 2025). The site is located on the outskirts of Cowbridge and not conveniently situated for walking, cycling or public transport accessibility. Since that decision, further pressures on the extremely limited public transport and nearby roads more generally make this site unsuitable for development.

Attachments: None

5152 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Mr David Philip Rowlands [3145]

Summary:

It should be stated that in the VALE OF GLAMORGAN REPLACEMENT DEVELOPMENT PLAN 2021-2036 CANDIDATE SITES ASSESSMENT AT DEPOSIT PLAN STAGE NOVEMBER 25, it was stated that this site was not allocated "as the site would represent unacceptable intrusion into the local countryside". This site is located on the outskirts of Cowbridge and is NOT conveniently situated for walking (no footpaths) cycling or public transport accessibility. This site should be left as pastureland as there has been an extensive and on-going development at nearby Clare Garden Village Cowbridge.

Full text:

It should be stated that in the VALE OF GLAMORGAN REPLACEMENT DEVELOPMENT PLAN 2021-2036 CANDIDATE SITES ASSESSMENT AT DEPOSIT PLAN STAGE NOVEMBER 25, it was stated that this site was not allocated "as the site would represent unacceptable intrusion into the local countryside". This site is located on the outskirts of Cowbridge and is NOT conveniently situated for walking (no footpaths) cycling or public transport accessibility. This site should be left as pastureland as there has been an extensive and on-going development at nearby Clare Garden Village Cowbridge.

Attachments: None

5419 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Mr Richard Norris [3249]

Summary:

Re. Site no 438

We object to the above candidate sites as
they represent unacceptable intrusion into the local countryside as stated in the LDP in 2025, and have a severe impact on the setting of a very ancient Celtic-Romano fortification. Furthermore the previous LDP 2021-2036 rejected these sites in 2015 at the Deposit Plan Stage. Site 438 and 440 would both be difficult for cycling and walking into Cowbridge which is a mile away, and there is no bus service
..

Full text:

Re. Site nos 367, 438, 440

We object to the above candidate sites as
they represent unacceptable intrusion into the local countryside as stated in the LDP in 2025, and have a severe impact on the setting of a very ancient Celtic-Romano fortification. Furthermore the previous LDP 2021-2036 rejected these sites in 2015 at the Deposit Plan Stage. Site 438 and 440 would both be difficult for cycling and walking into Cowbridge which is a mile away, and there is no bus service
..

Attachments: None

5749 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Dr David Webb [3213]

Summary:

Neither of the sites adjacent to Church Road Llanblethian, Ref 440 and 438, were included in the VoG LDP2021-2026 as both would intrude into the local countryside to an unacceptable degree. There needs to be a good reason to alter this decision. The sites are awkward for walking being hilly and more than 1 mile from the centre of Cowbridge . Also with the greatly increased traffic on the B4270 since commissioning of the Clare Gardens Estate, and the increase in 40 ton stone lorries on that road making cycling so hazardous the B4270 is hardly used now for access to Cowbridge . There is no public transport.
Another factor that seems to have been ignored is that as development creeps uphill along Church Road it becomes steadily more intrusive especially on the south of Church Road, and could eventually be on the sky line, and surround the iron age hill fort especially if development occurred on the north side of the fort

Full text:

Neither of the sites adjacent to Church Road Llanblethian, Ref 440 and 438, were included in the VoG LDP2021-2026 as both would intrude into the local countryside to an unacceptable degree. There needs to be a good reason to alter this decision. The sites are awkward for walking being hilly and more than 1 mile from the centre of Cowbridge . Also with the greatly increased traffic on the B4270 since commissioning of the Clare Gardens Estate, and the increase in 40 ton stone lorries on that road making cycling so hazardous the B4270 is hardly used now for access to Cowbridge . There is no public transport.
Another factor that seems to have been ignored is that as development creeps uphill along Church Road it becomes steadily more intrusive especially on the south of Church Road, and could eventually be on the sky line, and surround the iron age hill fort especially if development occurred on the north side of the fort

Attachments: None

5968 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Michael Lewis [3443]

Summary:

Sites 438 and 440 would put tremendous pressure onto the barely adequate road infrastructure in that area and also create a hazard for traffic pulling out onto the B4270 at the cross Inn. It would also my view be an unnecessary intrusion into the open countryside.

Full text:

I have concerns over the inclusion of certain candidate sites:

367-my concern is this site is on the side of a hill where water run-off if a large housing development went ahead could adversely affect the road below.
Also, my understanding is that it would be close vicinity to an iron age fort, which is a significance.

Sites 438 and 440 would put tremendous pressure onto the barely adequate road infrastructure in that area and also create a hazard for traffic pulling out onto the B4270 at the cross Inn. It would also my view be an unnecessary intrusion into the open countryside.

Site 455, again I think would put a lot of pressure on the road infrastructure and traffic lights at Cowbridge and again be an unnecessary intrusion into the open countryside. And would adversely affect the aesthetics of the gateway to Cowbridge which partly gives the town so much of its charm!

I think a very sensible inclusion is 448 the airfield and brownfield site at Llandow. My understanding is that with a little effort a new rail link could be established for this site which would be very sensible with regard to taking pressure from the road network.

Please let me know if it is not acceptable for me to comment on a number of sites in one email and I will gladly send other emails for each site individually.

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/tv8

5987 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Felicity Michaelides [3449]

Summary:

Llanblethian is an attractive and desirable rural community surrounded by prime agricultural land. The families who are fortunate enough to live in this community enjoy the many rural activities which this environment affords, and a country way of life. For the children, it is more important now than ever before that they engage with nature. Country walks ,which are many in this community, will rapidly disappear should more building developments be allowed to encroach on the surrounding rural landscape. With it will come added pollution and a considerable strain on the infrastructure. It is completely inadequate to take the inevitable added weight of traffic onto the already over congested Llantwit Major Road which is the main artery for many heavy commercial vehicles from the Llandow Industrial Estate.

Full text:

Candidate Sites 438 and 440
I would like to express my concerns for the planned development of the above sites.

Llanblethian is an attractive and desirable rural community surrounded by prime agricultural land.
The families who are fortunate enough to live in this community enjoy the many rural activities which this environment affords, and a country way of life. For the children, it is more important now than ever before that they engage with nature. Country walks ,which are many in this community, will rapidly disappear should more building developments be allowed to encroach on the surrounding rural landscape. With it will come added pollution and a considerable strain on the infrastructure. It is completely inadequate to take the inevitable added weight of traffic onto the already over congested Llantwit Major Road which is the main artery for many heavy commercial vehicles
from the Llandow Industrial Estate.

Taking these factors into account, I would strongly recommend that a more appropriate brown field site such as the disused airfield
at Llandow be utilised.

Attachments:

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

6397 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Mrs Claire Goulden [3569]
Petition: 2 petitioners

Summary:

We object to developments nos 438 south of Church Road, Llanblethian and 440 north of Church Road, Llanblethian between the Cross Inn and the village. This small road is already a busy route used by vehicles avoiding Cowbridge High Street, it is no more than a country lane and has no pavements or lightning. Added development would also make the dangerous junction between Church Road and the B4270 at the Cross Inn even worse.

Full text:

We object to the following proposals in the ldp replacement plan. The first is no 367 south of Llantwit Major Road, Cowbridge and no 440 north of Church Road, Llanblethian on land of considerable historical importance encompassing the site of a large iron age settlement. No 367 overlooks a new estate of nearly 500 houses (still under construction) with no added amenities provided to the town of Cowbridge.

We object to developments nos 438 south of Church Road, Llanblethian and 440 north of Church Road, Llanblethian between the Cross Inn and the village. This small road is already a busy route used by vehicles avoiding Cowbridge High Street, it is no more than a country lane and has no pavements or lightning. Added development would also make the dangerous junction between Church Road and the B4270 at the Cross Inn even worse.

Attachments:

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

6492 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Lynne Davies [3608]

Summary:

I strongly oppose any further development of Llanblethian and totally opposed to the 2 currently suggested areas for development.
There are not enough facilities in the area to support these continued developments.
Roads/schools/roads and infrastructure are not sufficient to support these continued developments.
This is a rural area and should be left to agricultural requirements without further housing developments.

Full text:

I strongly oppose any further development of Llanblethian and totally opposed to the 2 currently suggested areas for development.
There are not enough facilities in the area to support these continued developments.
Roads/schools/roads and infrastructure are not sufficient to support these continued developments.
This is a rural area and should be left to agricultural requirements without further housing developments.

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/ty5

7220 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 438 Land to the South of Church Rd, Llanblethian / Tir i'r de o Church Rd, Llanfleiddan

Respondent: Mr Thomas Lewis [3743]

Summary:

I am writing regarding the current consultation for the Replacement Local Development Plan (RLDP), specifically the candidate sites proposed for housing development in the Rural Vale area near Cowbridge.

I would like to formally express my strong concern about the inclusion of several greenfield sites for large-scale housing development. In particular, I am referring to candidate sites 367 (land on the bank approaching Cowbridge), 438 and 440 (between Cross Inn and Llanblethian), and 455 (Primrose Hill).

These locations form part of the rural landscape that defines the character of the Vale of Glamorgan and the setting of Cowbridge. Large housing estates on these greenfield sites would risk causing permanent damage to the countryside, the natural environment, and the historic rural character that makes this area unique.

The Rural Vale is valued for its open farmland, biodiversity, and scenic views. Development on this scale would place significant pressure on local infrastructure, increase traffic on already limited rural roads, and contribute to the gradual erosion of the countryside surrounding the town.

Where housing development is required, priority should instead be given to brownfield sites and previously developed land. For this reason, I believe that the potential redevelopment of site 448 at Llandow Airfield is a far more appropriate option, as it makes use of existing developed land rather than sacrificing valuable greenfield countryside.

I respectfully urge the Council to reconsider the inclusion of these greenfield sites in the RLDP and to prioritise sustainable development that protects the Rural Vale's landscape, environment, and heritage.

Thank you for taking the time to consider this representation as part of the consultation process.

Full text:

I am writing regarding the current consultation for the Replacement Local Development Plan (RLDP), specifically the candidate sites proposed for housing development in the Rural Vale area near Cowbridge.

I would like to formally express my strong concern about the inclusion of several greenfield sites for large-scale housing development. In particular, I am referring to candidate sites 367 (land on the bank approaching Cowbridge), 438 and 440 (between Cross Inn and Llanblethian), and 455 (Primrose Hill).

These locations form part of the rural landscape that defines the character of the Vale of Glamorgan and the setting of Cowbridge. Large housing estates on these greenfield sites would risk causing permanent damage to the countryside, the natural environment, and the historic rural character that makes this area unique.

The Rural Vale is valued for its open farmland, biodiversity, and scenic views. Development on this scale would place significant pressure on local infrastructure, increase traffic on already limited rural roads, and contribute to the gradual erosion of the countryside surrounding the town.

Where housing development is required, priority should instead be given to brownfield sites and previously developed land. For this reason, I believe that the potential redevelopment of site 448 at Llandow Airfield is a far more appropriate option, as it makes use of existing developed land rather than sacrificing valuable greenfield countryside.

I respectfully urge the Council to reconsider the inclusion of these greenfield sites in the RLDP and to prioritise sustainable development that protects the Rural Vale's landscape, environment, and heritage.

Thank you for taking the time to consider this representation as part of the consultation process.

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4r5

4539 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Mr Steven Thomas [2845]

Summary:

I remind the Vale Council planners that, in the VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036 CANDIDATE SITES ASSESSMENT AT DEPOSIT PLAN STAGE November 2025, it was stated that this site (ref 440) was not allocated "as the site would represent unacceptable intrusion into the local countryside. The proposal would have an adverse impact on the setting of an ancient schedule monument".

Full text:

I remind the Vale Council planners that, in the VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036 CANDIDATE SITES ASSESSMENT AT DEPOSIT PLAN STAGE November 2025, it was stated that this site (ref 440) was not allocated "as the site would represent unacceptable intrusion into the local countryside. The proposal would have an adverse impact on the setting of an ancient schedule monument".

Attachments: None

5123 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Llywelyn Lehnert [3133]

Summary:

Vale Council planners are reminded that in November 2025 they stated this site was not allocated "as the site would represent unacceptable intrusion into the local countryside' and 'have an adverse impact on the setting of an ancient schedule monument' (the Vale of Glamorgan Replacement Local Development plan 2021-2036 candidate sites assessment at deposit plan stage). The site is located on the outskirts of Cowbridge and not conveniently situated for walking, cycling or public transport accessibility. Since that decision, further pressures on the extremely limited public transport and nearby roads more generally make this site unsuitable for development.

Full text:

Vale Council planners are reminded that in November 2025 they stated this site was not allocated "as the site would represent unacceptable intrusion into the local countryside' and 'have an adverse impact on the setting of an ancient schedule monument' (the Vale of Glamorgan Replacement Local Development plan 2021-2036 candidate sites assessment at deposit plan stage). The site is located on the outskirts of Cowbridge and not conveniently situated for walking, cycling or public transport accessibility. Since that decision, further pressures on the extremely limited public transport and nearby roads more generally make this site unsuitable for development.

Attachments: None

5149 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Mr David Philip Rowlands [3145]

Summary:

I would remind the Vale Council planners that, in the VALE OF GLAMORGAN REPLACEMENT DEVELOPMENT PLAN 2021-2036 CANDIDATE SITES ASSESSMENT AT DEPOSIT PLAN STAGE, it was stated that this site NORTH OF CHURCH Rd (ref 440) was NOT allocated "as the site would represent unacceptable intrusion into the local countryside. The proposal would have an adverse and negative impact on the setting of an ancient schedule monument" This site is located on the outskirts of Cowbridge and not conveniently situated for walking (no public footpaths), cycling or public transport accessibility.

Full text:

I would remind the Vale Council planners that, in the VALE OF GLAMORGAN REPLACEMENT DEVELOPMENT PLAN 2021-2036 CANDIDATE SITES ASSESSMENT AT DEPOSIT PLAN STAGE, it was stated that this site NORTH OF CHURCH Rd (ref 440) was NOT allocated "as the site would represent unacceptable intrusion into the local countryside. The proposal would have an adverse and negative impact on the setting of an ancient schedule monument" This site is located on the outskirts of Cowbridge and not conveniently situated for walking (no public footpaths), cycling or public transport accessibility.

Attachments: None

5293 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Dr David Webb [3213]

Summary:

It would be highly intrusive into a rural area where there is no public transport and cycling and walking are unrealistic

Full text:

Neither of the sites adjacent to Church Road Llanblethian, Ref 440 and 438, were included in the VoG LDP2021-2026 as both would intrude into the local countryside to an unacceptable degree. There needs to be a good reason to alter this decision. The sites are awkward for walking being hilly and more than 1 mile from the centre of Cowbridge . Also with the greatly increased traffic on the B4270 since commissioning of the Clare Gardens Estate, and the increase in 40 ton stone lorries on that road making cycling so hazardous the B4270 is hardly used now for access to Cowbridge . There is no public transport.

Another factor that seems to have been ignored is that as development creeps uphill along Church Road it becomes steadily more intrusive especially on the south of Church Road, and could eventually be on the sky line, and surround the iron age hill fort especially if development occurred on the north side of the fort

Attachments: None

5969 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Michael Lewis [3443]

Summary:

Sites 438 and 440 would put tremendous pressure onto the barely adequate road infrastructure in that area and also create a hazard for traffic pulling out onto the B4270 at the cross Inn. It would also my view be an unnecessary intrusion into the open countryside.

Full text:

I have concerns over the inclusion of certain candidate sites:

367-my concern is this site is on the side of a hill where water run-off if a large housing development went ahead could adversely affect the road below.
Also, my understanding is that it would be close vicinity to an iron age fort, which is a significance.

Sites 438 and 440 would put tremendous pressure onto the barely adequate road infrastructure in that area and also create a hazard for traffic pulling out onto the B4270 at the cross Inn. It would also my view be an unnecessary intrusion into the open countryside.

Site 455, again I think would put a lot of pressure on the road infrastructure and traffic lights at Cowbridge and again be an unnecessary intrusion into the open countryside. And would adversely affect the aesthetics of the gateway to Cowbridge which partly gives the town so much of its charm!

I think a very sensible inclusion is 448 the airfield and brownfield site at Llandow. My understanding is that with a little effort a new rail link could be established for this site which would be very sensible with regard to taking pressure from the road network.

Please let me know if it is not acceptable for me to comment on a number of sites in one email and I will gladly send other emails for each site individually.

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/tv8

5988 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Felicity Michaelides [3449]

Summary:

Llanblethian is an attractive and desirable rural community surrounded by prime agricultural land. The families who are fortunate enough to live in this community enjoy the many rural activities which this environment affords, and a country way of life. For the children, it is more important now than ever before that they engage with nature. Country walks ,which are many in this community, will rapidly disappear should more building developments be allowed to encroach on the surrounding rural landscape. With it will come added pollution and a considerable strain on the infrastructure. It is completely inadequate to take the inevitable added weight of traffic onto the already over congested Llantwit Major Road which is the main artery for many heavy commercial vehicles from the Llandow Industrial Estate.

Full text:

Candidate Sites 438 and 440

I would like to express my concerns for the planned development of the above sites.

Llanblethian is an attractive and desirable rural community surrounded by prime agricultural land.
The families who are fortunate enough to live in this community enjoy the many rural activities which this environment affords, and a country way of life. For the children, it is more important now than ever before that they engage with nature. Country walks ,which are many in this community, will rapidly disappear should more building developments be allowed to encroach on the surrounding rural landscape. With it will come added pollution and a considerable strain on the infrastructure. It is completely inadequate to take the inevitable added weight of traffic onto the already over congested Llantwit Major Road which is the main artery for many heavy commercial vehicles
from the Llandow Industrial Estate.

Taking these factors into account, I would strongly recommend that a more appropriate brown field site such as the disused airfield
at Llandow be utilised.

Attachments:

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

6102 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Mr Richard Norris [3249]

Summary:

Re. Site no 440

We object to the above candidate sites as
they represent unacceptable intrusion into the local countryside as stated in the LDP in 2025, and have a severe impact on the setting of a very ancient Celtic-Romano fortification. Furthermore the previous LDP 2021-2036 rejected these sites in 2015 at the Deposit Plan Stage. Site 438 and 440 would both be difficult for cycling and walking into Cowbridge which is a mile away, and there is no bus service

Full text:

Re. Site nos 367, 438, 440

We object to the above candidate sites as
they represent unacceptable intrusion into the local countryside as stated in the LDP in 2025, and have a severe impact on the setting of a very ancient Celtic-Romano fortification. Furthermore the previous LDP 2021-2036 rejected these sites in 2015 at the Deposit Plan Stage. Site 438 and 440 would both be difficult for cycling and walking into Cowbridge which is a mile away, and there is no bus service
..

Attachments: None

6396 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Mrs Claire Goulden [3569]

Petition: 2 petitioners

Summary:

We object to no 440 north of Church Road, Llanblethian on land of considerable historical importance encompassing the site of a large iron age settlement.

We object to developments no 440 north of Church Road, Llanblethian between the Cross Inn and the village. This small road is already a busy route used by vehicles avoiding Cowbridge High Street, it is no more than a country lane and has no pavements or lightning. Added development would also make the dangerous junction between Church Road and the B4270 at the Cross Inn even worse.

Full text:

We object to the following proposals in the ldp replacement plan. The first is no 367 south of Llantwit Major Road, Cowbridge and no 440 north of Church Road, Llanblethian on land of considerable historical importance encompassing the site of a large iron age settlement. No 367 overlooks a new estate of nearly 500 houses (still under construction) with no added amenities provided to the town of Cowbridge.

We object to developments nos 438 south of Church Road, Llanblethian and 440 north of Church Road, Llanblethian between the Cross Inn and the village. This small road is already a busy route used by vehicles avoiding Cowbridge High Street, it is no more than a country lane and has no pavements or lightning. Added development would also make the dangerous junction between Church Road and the B4270 at the Cross Inn even worse.

Attachments:

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

6493 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Lynne Davies [3608]

Summary:

I strongly oppose any further development of Llanblethian and totally opposed to the 2 currently suggested areas for development.
There are not enough facilities in the area to support these continued developments.
Roads/schools/roads and infrastructure are not sufficient to support these continued developments.
This is a rural area and should be left to agricultural requirements without further housing developments.

Full text:

I strongly oppose any further development of Llanblethian and totally opposed to the 2 currently suggested areas for development.
There are not enough facilities in the area to support these continued developments.
Roads/schools/roads and infrastructure are not sufficient to support these continued developments.
This is a rural area and should be left to agricultural requirements without further housing developments.

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/ty5

7221 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 440 Land North of Church Road, Llanblethian / Tir i'r gogledd o Church Road, Llanfleiddan

Respondent: Mr Thomas Lewis [3743]

Summary:

I am writing regarding the current consultation for the Replacement Local Development Plan (RLDP), specifically the candidate sites proposed for housing development in the Rural Vale area near Cowbridge.

I would like to formally express my strong concern about the inclusion of several greenfield sites for large-scale housing development. In particular, I am referring to candidate sites 367 (land on the bank approaching Cowbridge), 438 and 440 (between Cross Inn and Llanblethian), and 455 (Primrose Hill).

These locations form part of the rural landscape that defines the character of the Vale of Glamorgan and the setting of Cowbridge. Large housing estates on these greenfield sites would risk causing permanent damage to the countryside, the natural environment, and the historic rural character that makes this area unique.

The Rural Vale is valued for its open farmland, biodiversity, and scenic views. Development on this scale would place significant pressure on local infrastructure, increase traffic on already limited rural roads, and contribute to the gradual erosion of the countryside surrounding the town.

Where housing development is required, priority should instead be given to brownfield sites and previously developed land. For this reason, I believe that the potential redevelopment of site 448 at Llandow Airfield is a far more appropriate option, as it makes use of existing developed land rather than sacrificing valuable greenfield countryside.

I respectfully urge the Council to reconsider the inclusion of these greenfield sites in the RLDP and to prioritise sustainable development that protects the Rural Vale's landscape, environment, and heritage.

Thank you for taking the time to consider this representation as part of the consultation process.

Full text:

I am writing regarding the current consultation for the Replacement Local Development Plan (RLDP), specifically the candidate sites proposed for housing development in the Rural Vale area near Cowbridge.

I would like to formally express my strong concern about the inclusion of several greenfield sites for large-scale housing development. In particular, I am referring to candidate sites 367 (land on the bank approaching Cowbridge), 438 and 440 (between Cross Inn and Llanblethian), and 455 (Primrose Hill).

These locations form part of the rural landscape that defines the character of the Vale of Glamorgan and the setting of Cowbridge. Large housing estates on these greenfield sites would risk causing permanent damage to the countryside, the natural environment, and the historic rural character that makes this area unique.

The Rural Vale is valued for its open farmland, biodiversity, and scenic views. Development on this scale would place significant pressure on local infrastructure, increase traffic on already limited rural roads, and contribute to the gradual erosion of the countryside surrounding the town.

Where housing development is required, priority should instead be given to brownfield sites and previously developed land. For this reason, I believe that the potential redevelopment of site 448 at Llandow Airfield is a far more appropriate option, as it makes use of existing developed land rather than sacrificing valuable greenfield countryside.

I respectfully urge the Council to reconsider the inclusion of these greenfield sites in the RLDP and to prioritise sustainable development that protects the Rural Vale's landscape, environment, and heritage.

Thank you for taking the time to consider this representation as part of the consultation process.

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4r5

4394 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 448 Land at Llandow Airfield / Tir ym Maes Awyr LLandŵ

Respondent: Mr Ieuan Thomas [2750]

Summary:

We need more houses that young people can afford.

Also its near the railway line so a rail station could be build.

Why are we expanding our villages , when we could build a new village with modern schools etc

Full text:

We need more houses that young people can afford.

Also its near the railway line so a rail station could be build.

Why are we expanding our villages , when we could build a new village with modern schools etc

Attachments: None

4935 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 448 Land at Llandow Airfield / Tir ym Maes Awyr LLandŵ

Respondent: Mrs Karen Jacobs [2746]

Summary:

I object to the removal of this site from the Candidate List for the RLDP 2021 to 2036.
It is brownfield and should be used as an alternative to using greenfield areas in minor rural locations – even if it means creating a new settlement. This would spare the environment and historical landscapes in rural villages from ruin, and preserve the agricultural heritage for future generations.

Full text:

I object to the removal of this site from the Candidate List for the RLDP 2021 to 2036.
It is brownfield and should be used as an alternative to using greenfield areas in minor rural locations – even if it means creating a new settlement. This would spare the environment and historical landscapes in rural villages from ruin, and preserve the agricultural heritage for future generations.

Attachments: None

5972 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 448 Land at Llandow Airfield / Tir ym Maes Awyr LLandŵ

Respondent: Michael Lewis [3443]

Summary:

I think a very sensible inclusion is site 448 the airfield and brownfield site at Llandow. My understanding is that with a little effort a new rail link could be established for this site which would be very sensible with regard to taking pressure from the road network.

Full text:

I have concerns over the inclusion of certain candidate sites:

367-my concern is this site is on the side of a hill where water run-off if a large housing development went ahead could adversely affect the road below.
Also, my understanding is that it would be close vicinity to an iron age fort, which is a significance.

Sites 438 and 440 would put tremendous pressure onto the barely adequate road infrastructure in that area and also create a hazard for traffic pulling out onto the B4270 at the cross Inn. It would also my view be an unnecessary intrusion into the open countryside.

Site 455, again I think would put a lot of pressure on the road infrastructure and traffic lights at Cowbridge and again be an unnecessary intrusion into the open countryside. And would adversely affect the aesthetics of the gateway to Cowbridge which partly gives the town so much of its charm!

I think a very sensible inclusion is 448 the airfield and brownfield site at Llandow. My understanding is that with a little effort a new rail link could be established for this site which would be very sensible with regard to taking pressure from the road network.

Please let me know if it is not acceptable for me to comment on a number of sites in one email and I will gladly send other emails for each site individually.

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/tv8

6897 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 448 Land at Llandow Airfield / Tir ym Maes Awyr LLandŵ

Respondent: Catesby Estates [3713]

Agent: Turley

Summary:

The Stage 2 Candidate Site Register confirms that the site was not considered suitable for further consideration by VoGC. This was primarily due to its location outside of existing settlement boundaries and the scale of dwellings/services proposed. It was concluded that the scale of development proposed could be considered a new settlement, which should only be proposed as part of a joint LDP, an SDP or Future Wales.

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

Full text:

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

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

Catesby control a significant amount of land at, and surrounding Llandow Airfield, and sought promotion (previously promoted by L&Q Estates prior to its acquisition by Catesby) of the site during the call for Candidate Sites (Site ID Ref: 448). The Stage 2 Candidate Site Register confirms that the site was not considered suitable for further consideration by VoGC. This was primarily due to its location outside of existing settlement boundaries and the scale of

dwellings/services proposed. It was concluded that the scale of development proposed could be considered a new settlement, which should only be proposed as part of a joint LDP, an SDP or Future Wales.

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

VISION AND STRATEGIC OBJECTIVES

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

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

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

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

SUSTAINABLE GROWTH STRATEGY

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

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

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

Figure 1: Key Diagram

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

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

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

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

POLICY FRAMEWORK

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

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

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

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

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

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

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

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

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

SUMMARY

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

Attachments:

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

7157 Comment

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 448 Land at Llandow Airfield / Tir ym Maes Awyr LLandŵ

Respondent: Mr David Keith Brown [2195]

Summary:

Why has land on the old Llandow airfield not been considered? This could have access to a rail line nearby.

Full text:

We wish to object to the above development.
The site is inappropriate for building 105 houses especially elderly people with a 12° slope and should be removed from the proposed RLDP. It will not deliver sustainable housing and it will mean a big loss of amenities to the community. The present access has been obtained for agricultural access only, not a 2 way access for traffic from the St. Athan Road. Positioned as it is, on a 90° bend, this makes access from the St. Athan Road travelling southwards extremely dangerous especially for bikes, motor bikes and cyclists. The development is on a green field site in a special landscape area which is against Welsh government policy.
There is unsafe pedestrian access from both Cowbridge and from a southerly direction.

The devlopment will have an adverse impact on the landscape of the Thaw valley, a designated Special Landscape Area and would mean the loss of a rural public foot path. The site is situated at the end of a privately owned and privately maintained lane, namely Windmill Lane. Whilst there is public access through the lane by footpath to the field, vehicular access has only been allowed for agricultural purposes, and for services to the properties adjoining the lane. The residents will have their privacy impacted by the increased pedestrian traffic.
The site has been refused planning permission 3 times in the past. This position has not changed since then.
As an alternative site, why has land on the old Llandow airfield not been considered? This could have access to a rail line nearby.

Attachments:

Email Representation redacted - https://valeofglamorgan.oc2.uk/a/sqn

4546 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 453 Land to the East of Colwinston / Tir i'r dwyrain o Dregolwyn

Respondent: Mr Rob G Thomas [683]

Summary:

Parcel 453 site would have a substantial impact and intrusion into the open Countryside, being detrimental and with increased contribution to climate change .

Market led housing promotion into the Open Countryside.

NO DVM supplied.

NO Active travel Wales Act 2013 , supported.

Loss of substantial BVM under ALC Wales Classification.

No Access to Retail

No Access to Healtcare

Substantial change in Character and adverse effects on landscape and visual amenities.

Contradictions to VoGCC policies

Full text:

Parcel 453 site would have a substantial impact and intrusion into the open Countryside, being detrimental and with increased contribution to climate change .

Market led housing promotion into the Open Countryside.

NO DVM supplied.

NO Active travel Wales Act 2013 , supported.

Loss of substantial BVM under ALC Wales Classification.

No Access to Retail

No Access to Healtcare

Substantial change in Character and adverse effects on landscape and visual amenities.

Contradictions to VoGCC policies

Attachments: None

5929 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 455 Land North of Primrose Hill / Tir i'r gogledd o Primrose Hill

Respondent: Lindsey Bulleid [2240]

Summary:

I believe this site is better suited to development as these areas are already partially suburbanised and do not have the unspoilt rural views/space/character that the bryn melin and associated sites do. There is already some development within the area of this site. It is well connected with safe easy walking routes into the town centre, and better developed access to public transport and local amenities.

Full text:

I would like to express my objection to development of the proposed Bryn Melin site 370.

Environmentally I feel this is an inappropriate area to develop. The site (and adjoining sites 475/514) are within the Thaw valley designated special landscape area which should be protected.
Development here would destroy the character of the area and significantly impact negatively on the biodiversity and the natural lived experience of the people within Cowbridge. This is against the vale of Glamorgan's goals to respect landscape a resource, respect scenic quality of an area, respect unspoilt character and integrity, respect the sense of place created by landscape and to conserve these attributes. The valley and the fields, the view, the sense of open space, the footpaths that people can use to walk and enjoy being in nature right next the Cowbridge town are all integral to the sense of character and place of Cowbridge. This section of the valley currently stands alone as a natural vista, and does not have encroachment of suburban development. It is enjoyed by so many. You stand in it and look out, you walk through it, and you can be entirely in the countryside. This is a significant characteristic of a rural town such as Cowbridge and losing this here will represent suburban creep and destruction of this natural character. These attributes would be ruined by development here. I believe other proposed sites such as sites 455 and 367 are better suited to development as these areas are already partially suburbanised and do not have the unspoilt rural views/space/character that the bryn melin and associated sites do.

Ultimately, there is no development currently on the Bryn Melin site, whereas there is already some development within the area of the sites 455 and 367.

Functionally I also have significant concerns about development of Bryn Melin site 370 and the adjoining sites 475 and 514. The transport infrastructure is not supportive of housing here. The St Athan road is small, windy, dangerous with no footpath. There is no public transport within easy walking distance. Amenities are also not within safe or easy walking distance and will necessitate people driving into Cowbridge. This is completely against the Vale's own goals and ideation when it comes to sustainable and appropriate development. Conversely sites 455 and 367 are well connected with safe easy walking routes into the town centre, and access to public transport.

The site at Bryn Melin is also very steep which environmentally and socially is not a good characteristic for development. The slope is 12% and there is poor access. Again, the sites proposed at 455 and 367 appear more suitable for development with better developed access to the local amenities.

Cowbridge Town Council unanimously rejected the inclusion of Site 370 in the RLDP on 24/02/2026
As outlined in the Cowbridge Placemaking Plan, local identity, sustainable growth, and protection/enhancement of town character, public spaces and the town-edge environment is incredibly important.
Building on these sites in this unspoilt valley is contrary to these principles and undermines local placemaking desires. There must be sites that are more coherent with the ideals and values of the area?

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t8n

5971 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 455 Land North of Primrose Hill / Tir i'r gogledd o Primrose Hill

Respondent: Michael Lewis [3443]

Summary:

Site 455 I think would put a lot of pressure on the road infrastructure and traffic lights at Cowbridge and again be an unnecessary intrusion into the open countryside. And would adversely affect the aesthetics of the gateway to Cowbridge which partly gives the town so much of its charm!

Full text:

I have concerns over the inclusion of certain candidate sites:

367-my concern is this site is on the side of a hill where water run-off if a large housing development went ahead could adversely affect the road below.
Also, my understanding is that it would be close vicinity to an iron age fort, which is a significance.

Sites 438 and 440 would put tremendous pressure onto the barely adequate road infrastructure in that area and also create a hazard for traffic pulling out onto the B4270 at the cross Inn. It would also my view be an unnecessary intrusion into the open countryside.

Site 455, again I think would put a lot of pressure on the road infrastructure and traffic lights at Cowbridge and again be an unnecessary intrusion into the open countryside. And would adversely affect the aesthetics of the gateway to Cowbridge which partly gives the town so much of its charm!

I think a very sensible inclusion is 448 the airfield and brownfield site at Llandow. My understanding is that with a little effort a new rail link could be established for this site which would be very sensible with regard to taking pressure from the road network.

Please let me know if it is not acceptable for me to comment on a number of sites in one email and I will gladly send other emails for each site individually.

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/tv8

6065 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 455 Land North of Primrose Hill / Tir i'r gogledd o Primrose Hill

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

Cowbridge's inclusion as a Service Centre Settlement within the Strategic Growth Area Settlement Hierarchy is endorsed, recognising its access to services and excellent transport links. The under-allocation of housing land for Cowbridge, with only 105 units planned and no major lank bank sites is insufficient given that Cowbridge is a Tier 2 settlement in the hierarchy. To meet housing needs and the RLDP's growth strategy more land at Cowbridge needs to be allocated for housing including land at Primrose Hill, for up to 220 dwellings.

Full text:

The inclusion of Cowbridge as Service Centre Settlement within the Strategic Growth Area Settlement Hierarchy in Policy SP2 is endorsed. Cowbridge comprises a sustainable self-contained settlement with regards to access to services such as primary and secondary schools, shops including supermarkets, medical services at the GP surgery and pharmacy, sports activities including a leisure centre, a library and places of worship. Cowbridge has excellent connections to the A48 with regular bus services providing access to Cardiff, Porthcawl and Llantwit Major.

The Service Centre Settlements are the middle-tier in Policy SP2 and as well as Cowbridge, include Llantwit Major and Penarth. The Key Settlement of Barry being the top-tier and the Primary Settlements of Rhoose, St Athan, Sully, Llandough (Penarth) and Dinas Powys being categorised as the lower-tier, below Cowbridge.

Policy SP2 states that Service Centre Settlements "are important settlements that offer a range of services and facilities. Serving the needs of their residents, they also act as important hubs for those living in nearby smaller settlements. Future growth will support this role where the level of development will meet the local needs of the area."

Policy HG1 sets out the housing allocations to meet the identified housing requirement set out in Policy SP6. HG1 allocates sites for a total of 3,398 dwellings across Key Sites and Housing Allocations. Of the 3,398 units:

• Key Settlement (tier 1) = 686 (20.2%)

• Service Centres (tier 2) = 340 (10%)

• Primary Settlements (tier 3) = 2,372 (69.8%)

It is clear that the allocations in Policy HG1 do not reflect the proposed settlement hierarchy with an under representation of allocations in the second tier Service Centre Settlements. There are only two allocations in Service Centre Settlements: HG1(5) at Llantwit Major for 235 units and HG1(6) at Cowbridge for 105 units.

A review by settlement further highlights the under provision of allocations and major land bank sites at Cowbridge compared to other higher order settlements:

Tier 1 Barry – 686

Tier 2 Cowbridge – 105
Llantwit Major – 475
Penarth – 576

Tier 3 Rhoose – 859
St Athan – 1,263
Sully – 175
Llandough – 133
Dinas Powys – 250

It is evident that there are fewer allocations made to Cowbridge than any other higher order settlement and significantly less than many of the tier 3 settlements. A review of the Housing Land Supply document BP9A highlights that there is only planning permission for 203 dwellings in Cowbridge that were not started as of April 2025. The case cannot be made that there is an existing unimplemented land bank to meet the needs of this settlement.

Furthermore, Paragraph 3.5 of the Local Housing Market Assessment (2023) sets out that “The 2021 LHMA indicated that the existing backlog of need is most acute from people on the housing waiting list within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhoose, Wenvoe and St Athan although there are a significant number of people on the waiting list across all areas of the Vale.”

Having only one allocation, and no major land bank sites at Cowbridge does not reflect the importance of Cowbridge as a Service Centre Settlement. The failure to make significant new allocations in this Tier 2 settlement undermines the ability of this important settlement to meet its housing needs including affordable needs.

Policy HG1 apportions only 105 dwellings (or only 1.3% of the housing requirement as set out in Policy SP1) to one of only three second tier settlements. Thus, the number of units allocated to Cowbridge does not align with the Settlement Hierarchy presented in Policy SP2. As explained in our representations to Policy SP1 and SP6 above, a more ambitious housing requirement is needed in the VoG.

It is therefore evident that in order for the RLDP to meet the third test of soundness (Will the Plan deliver?), Cowbridge needs additional housing allocations to ensure that housing is delivered at a scale commensurate to the settlement hierarchy in Policy SP2 and to achieve the RLDP Growth Strategy which commits to housing growth that accords with the Vale’s position within the Cardiff Capital Region.

Land at Primrose Hill (with a capacity of up to 220 dwellings) is available, with limited physical and environmental constraints, to assist with the much-needed increased delivery of housing at Cowbridge during this RLDP period.

Attachments: None

6405 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 455 Land North of Primrose Hill / Tir i'r gogledd o Primrose Hill

Respondent: Mrs Pamela Kay [3572]

Summary:

I would like to object to the development of the Bryn Melin field (site 370, and adjoining sites 475 and 514). Other sites (e.g 455 and 367) seem better suited to development as they have better access/transport links and already have adjacent suburban sprawl.

Full text:

I would like to object to the development of the Bryn Melin field (site 370, and adjoining sites 475 and 514)
This site is not as well suited as alternative sites (such as 455 and 367), and directly contravenes the placemaking goals and priorities of the area.
The site is within the thaw valley designated special landscape area and has uninterrupted views and access to nature. There is currently no development/suburban creep in this vicinity and developing here would destroy that. Other alternative sites (eg 455 and 367) appear better suited as they are already adjacent to suburban sprawl.
I am also particularly interested in astronomy. This area of Cowbridge, as it is a valley with no development, has significantly less light pollution than other more suburbanised areas. This is a valuable and a relatively rare resource so close to a town. Development here would destroy this.
I also do not feel the site is appropriate for a housing development. The site itself is very steep and the St Athan road is steep, narrow, with blind bends and no footpaths and no public transport. There is no easily accessible local access to jobs/amenities. Other sites (e.g 455 and 367) seem better suited to development as they have better access/transport links and already have adjacent suburban sprawl.
Please retain this site within open countryside and protect it for people to enjoy, for the wildlife and diversity that currently lives there, and to maintain the character of the area.

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4sz

7222 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 455 Land North of Primrose Hill / Tir i'r gogledd o Primrose Hill

Respondent: Mr Thomas Lewis [3743]

Summary:

I am writing regarding the current consultation for the Replacement Local Development Plan (RLDP), specifically the candidate sites proposed for housing development in the Rural Vale area near Cowbridge.

I would like to formally express my strong concern about the inclusion of several greenfield sites for large-scale housing development. In particular, I am referring to candidate sites 367 (land on the bank approaching Cowbridge), 438 and 440 (between Cross Inn and Llanblethian), and 455 (Primrose Hill).

These locations form part of the rural landscape that defines the character of the Vale of Glamorgan and the setting of Cowbridge. Large housing estates on these greenfield sites would risk causing permanent damage to the countryside, the natural environment, and the historic rural character that makes this area unique.

The Rural Vale is valued for its open farmland, biodiversity, and scenic views. Development on this scale would place significant pressure on local infrastructure, increase traffic on already limited rural roads, and contribute to the gradual erosion of the countryside surrounding the town.

Where housing development is required, priority should instead be given to brownfield sites and previously developed land. For this reason, I believe that the potential redevelopment of site 448 at Llandow Airfield is a far more appropriate option, as it makes use of existing developed land rather than sacrificing valuable greenfield countryside.

I respectfully urge the Council to reconsider the inclusion of these greenfield sites in the RLDP and to prioritise sustainable development that protects the Rural Vale's landscape, environment, and heritage.

Thank you for taking the time to consider this representation as part of the consultation process.

Full text:

I am writing regarding the current consultation for the Replacement Local Development Plan (RLDP), specifically the candidate sites proposed for housing development in the Rural Vale area near Cowbridge.

I would like to formally express my strong concern about the inclusion of several greenfield sites for large-scale housing development. In particular, I am referring to candidate sites 367 (land on the bank approaching Cowbridge), 438 and 440 (between Cross Inn and Llanblethian), and 455 (Primrose Hill).

These locations form part of the rural landscape that defines the character of the Vale of Glamorgan and the setting of Cowbridge. Large housing estates on these greenfield sites would risk causing permanent damage to the countryside, the natural environment, and the historic rural character that makes this area unique.

The Rural Vale is valued for its open farmland, biodiversity, and scenic views. Development on this scale would place significant pressure on local infrastructure, increase traffic on already limited rural roads, and contribute to the gradual erosion of the countryside surrounding the town.

Where housing development is required, priority should instead be given to brownfield sites and previously developed land. For this reason, I believe that the potential redevelopment of site 448 at Llandow Airfield is a far more appropriate option, as it makes use of existing developed land rather than sacrificing valuable greenfield countryside.

I respectfully urge the Council to reconsider the inclusion of these greenfield sites in the RLDP and to prioritise sustainable development that protects the Rural Vale's landscape, environment, and heritage.

Thank you for taking the time to consider this representation as part of the consultation process.

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4r5

4461 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 464 Land opposite St David's Church in Wales Primary School / Tir gyferbyn ag Ysgol Gynradd yr Eglwys yng Nghymru Dewi Sant

Respondent: Ms Sian Hooper [2795]

Summary:

Access through the lanes, leading in and out of Colwinston are already difficult during school start/finish times.
Any increase in housing numbers would worsen this situation.

Full text:

Access through the lanes, leading in and out of Colwinston are already difficult during school start/finish times.
Any increase in housing numbers would worsen this situation.

Attachments: None

4557 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 464 Land opposite St David's Church in Wales Primary School / Tir gyferbyn ag Ysgol Gynradd yr Eglwys yng Nghymru Dewi Sant

Respondent: Mr Rob G Thomas [683]

Summary:

The Preferred site for Development here in Colwinston.
Being Opposite the Village Primary School and Village Bus Stop , thus Supporting All Active Travel in Wales 2013 Act policies and Objective 8 and 2.12 and 2.13 as route identified and on Hold by VoGCC for completion.

Not on any flood plain unlike allocation HG4 (1) site that is.

Supports and mitigate effects of climate change

Supports access to retail and Village Businesses

ALC Wales states low BMV loss

LH/MA state Clear need for Homes in the next 5 years thus important contribution to that target.

Appropriate to community it serves.

Full text:

The Preferred site for Development here in Colwinston.
Being Opposite the Village Primary School and Village Bus Stop , thus Supporting All Active Travel in Wales 2013 Act policies and Objective 8 and 2.12 and 2.13 as route identified and on Hold by VoGCC for completion.

Not on any flood plain unlike allocation HG4 (1) site that is.

Supports and mitigate effects of climate change

Supports access to retail and Village Businesses

ALC Wales states low BMV loss

LH/MA state Clear need for Homes in the next 5 years thus important contribution to that target.

Appropriate to community it serves.

Attachments: None

4933 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 464 Land opposite St David's Church in Wales Primary School / Tir gyferbyn ag Ysgol Gynradd yr Eglwys yng Nghymru Dewi Sant

Respondent: Mrs Karen Jacobs [2746]

Summary:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Full text:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Attachments: None

5900 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 464 Land opposite St David's Church in Wales Primary School / Tir gyferbyn ag Ysgol Gynradd yr Eglwys yng Nghymru Dewi Sant

Respondent: Mr Mathew Haines [3420]

Summary:

I support allocating Site 464 opposite St David's Primary School in Colwinston as the most suitable affordable-housing-led site. It is capable of supporting up to 25 dwellings, aligning with the RLDP strategy for small-scale development that maintains community character and offers at least 50% affordable housing. Its location near the school, bus stop, and footpath promotes active travel and sustainability. This site better meets Welsh and local policies on sustainable rural communities than larger countryside options, and it addresses the substantial affordable housing need identified in the local market assessment.

Full text:

I support the allocation of Site 464, land opposite St David's Church in Wales Primary School, Colwinston, as the most appropriate affordable-housing-led site for the village. The Council's own evidence distinguishes this site from other Colwinston options: while market-led housing here would not be acceptable, the site has expressly been identified as capable of reconsideration for a small-scale affordable-housing-led development, subject to need, viability and agricultural land survey work, at a maximum of 25 dwellings.

This makes Site 464 a better fit with the RLDP strategy than larger countryside sites. The RLDP supports small-scale affordable-housing-led development in minor rural settlements at a scale proportionate to the community, with a minimum of 50% affordable housing, specifically to help younger and working-age households remain in their communities and to sustain local services, including schools. By contrast, the Council's own assessment of land to the east of Colwinston states that it would represent unacceptable intrusion into the open countryside and is at a scale that could not be considered a suitable affordable-housing-led site.

Site 464 is also the stronger option in accessibility and placemaking terms. It sits opposite the village primary school, by the bus stop, and next to an existing footpath. This directly reflects RLDP Objective 8, which seeks development in locations accessible by walking, cycling and public transport and which increase opportunities for active travel. The Council's own infrastructure evidence for Colwinston refers to improved bus stops, safe pedestrian crossing, and enhanced walking and cycling links around St David's Primary School and the wider village.

The site is therefore better aligned with Welsh and local policy on sustainable rural communities, active travel and climate resilience. The Council's A48-to-Colwinston active travel work is intended to improve safe access to bus stops, schools and community facilities and forms part of its wider climate response. In that context, locating affordable homes where future residents can walk to the school, bus stop and community facilities is a more sustainable outcome than growth that is less well integrated with those everyday destinations.

The affordable housing case is compelling. The Vale's Local Housing Market Assessment identifies very substantial affordable housing need, and the RLDP confirms that Colwinston is one of the rural settlements intended to accommodate affordable-housing-led growth. Local lettings policies are also intended to continue in minor rural settlements, helping such homes serve people with genuine local connections and preserving community balance over time.

For those reasons, Site 464 should be preferred as the most appropriate form of growth for Colwinston: modest in scale, affordable-housing-led, related to the existing village form, supportive of the school and community facilities, and more closely aligned with the Council's own strategy for minor rural settlements. If the Council is to allocate growth in Colwinston, it should do so in the form that its own evidence indicates may be appropriate here.

Attachments: None

6283 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 464 Land opposite St David's Church in Wales Primary School / Tir gyferbyn ag Ysgol Gynradd yr Eglwys yng Nghymru Dewi Sant

Respondent: Susan Davies [3519]

Summary:

Representation in Support of an Affordable Housing-Led Allocation at Land Opposite St David's Church in Wales Primary School, Colwinston (Site 464) I support the allocation of Site 464, land opposite St David's Church in Wales Primary School, Colwinston, as the most appropriate affordable-housing-led site for the village. The Council's own evidence distinguishes this site from other Colwinston options: while market-led housing here would not be acceptable, the site has expressly been identified as capable of reconsideration for a small-scale affordable-housing-led development, subject to need, viability and agricultural land survey work, at a maximum of 25 dwellings. This makes Site 464 a better fit with the RLDP strategy than larger countryside sites.

The RLDP supports small-scale affordable-housing-led development in minor rural settlements at a scale proportionate to the community, with a minimum of 50% affordable housing, specifically to help younger and working-age households remain in their communities and to sustain local services, including schools. By contrast, the Council's own assessment of land to the east of Colwinston states that it would represent unacceptable intrusion into the open countryside and is at a scale that could not be considered a suitable affordable-housing-led site. Site 464 is also the stronger option in accessibility and placemaking terms. It sits opposite the village primary school, by the bus stop, and next to an existing footpath. This directly reflects RLDP Objective 8, which seeks development in locations accessible by walking, cycling and public transport and which increase opportunities for active travel.

The Council's own infrastructure evidence for Colwinston refers to improved bus stops, safe pedestrian crossing, and enhanced walking and cycling links around St David's Primary School and the wider village. The site is therefore better aligned with Welsh and local policy on sustainable rural communities, active travel and climate resilience. The Council's A48-to-Colwinston active travel work is intended to improve safe access to bus stops, schools and community facilities and forms part of its wider climate response.

In that context, locating affordable homes where future residents can walk to the school, bus stop and community facilities is a more sustainable outcome than growth that is less well integrated with those everyday destinations. The affordable housing case is compelling. The Vale's Local Housing Market Assessment identifies very substantial affordable housing need, and the RLDP confirms that Colwinston is one of the rural settlements intended to accommodate affordable-housing-led growth. Local lettings policies are also intended to continue in minor rural settlements, helping such homes serve people with genuine local connections and preserving community balance over time.

For those reasons, Site 464 should be preferred as the most appropriate form of growth for Colwinston: modest in scale, affordable-housing-led, related to the existing village form, supportive of the school and community facilities, and more closely aligned with the Council's own strategy for minor rural settlements. If the Council is to allocate growth in Colwinston, it should do so in the form that its own evidence indicates may be appropriate here.

Full text:

Representation in Support of an Affordable Housing-Led Allocation at Land Opposite St David's Church in Wales Primary School, Colwinston (Site 464) I support the allocation of Site 464, land opposite St David's Church in Wales Primary School, Colwinston, as the most appropriate affordable-housing-led site for the village. The Council's own evidence distinguishes this site from other Colwinston options: while market-led housing here would not be acceptable, the site has expressly been identified as capable of reconsideration for a small-scale affordable-housing-led development, subject to need, viability and agricultural land survey work, at a maximum of 25 dwellings. This makes Site 464 a better fit with the RLDP strategy than larger countryside sites. The RLDP supports small-scale affordable-housing-led development in minor rural settlements at a scale proportionate to the community, with a minimum of 50% affordable housing, specifically to help younger and working-age households remain in their communities and to sustain local services, including schools. By contrast, the Council's own assessment of land to the east of Colwinston states that it would represent unacceptable intrusion into the open countryside and is at a scale that could not be considered a suitable affordable-housing-led site. Site 464 is also the stronger option in accessibility and placemaking terms. It sits opposite the village primary school, by the bus stop, and next to an existing footpath. This directly reflects RLDP Objective 8, which seeks development in locations accessible by walking, cycling and public transport and which increase opportunities for active travel. The Council's own infrastructure evidence for Colwinston refers to improved bus stops, safe pedestrian crossing, and enhanced walking and cycling links around St David's Primary School and the wider village. The site is therefore better aligned with Welsh and local policy on sustainable rural communities, active travel and climate resilience. The Council's A48-to-Colwinston active travel work is intended to improve safe access to bus stops, schools and community facilities and forms part of its wider climate response. In that context, locating affordable homes where future residents can walk to the school, bus stop and community facilities is a more sustainable outcome than growth that is less well integrated with those everyday destinations. The affordable housing case is compelling. The Vale's Local Housing Market Assessment identifies very substantial affordable housing need, and the RLDP confirms that Colwinston is one of the rural settlements intended to accommodate affordable-housing-led growth. Local lettings policies are also intended to continue in minor rural settlements, helping such homes serve people with genuine local connections and preserving community balance over time. For those reasons, Site 464 should be preferred as the most appropriate form of growth for Colwinston: modest in scale, affordable-housing-led, related to the existing village form, supportive of the school and community facilities, and more closely aligned with the Council's own strategy for minor rural settlements. If the Council is to allocate growth in Colwinston, it should do so in the form that its own evidence indicates may be appropriate here.

Attachments:

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

6754 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 464 Land opposite St David's Church in Wales Primary School / Tir gyferbyn ag Ysgol Gynradd yr Eglwys yng Nghymru Dewi Sant

Respondent: Miss Leyann Davies [3303]

Summary:

Representation in Support of an Affordable Housing-Led Allocation at Land Opposite St David's Church in Wales Primary School, Colwinston (Site 464) I support the allocation of Site 464, land opposite St David's Church in Wales Primary School, Colwinston, as the most appropriate affordable-housing-led site for the village. The Council's own evidence distinguishes this site from other Colwinston options: while market-led housing here would not be acceptable, the site has expressly been identified as capable of reconsideration for a small-scale affordable-housing-led development, subject to need, viability and agricultural land survey work, at a maximum of 25 dwellings. This makes Site 464 a better fit with the RLDP strategy than larger countryside sites.

The RLDP supports small-scale affordable-housing-led development in minor rural settlements at a scale proportionate to the community, with a minimum of 50% affordable housing, specifically to help younger and working-age households remain in their communities and to sustain local services, including schools. By contrast, the Council's own assessment of land to the east of Colwinston states that it would represent unacceptable intrusion into the open countryside and is at a scale that could not be considered a suitable affordable-housing-led site. Site 464 is also the stronger option in accessibility and placemaking terms. It sits opposite the village primary school, by the bus stop, and next to an existing footpath. This directly reflects RLDP Objective 8, which seeks development in locations accessible by walking, cycling and public transport and which increase opportunities for active travel.

The Council's own infrastructure evidence for Colwinston refers to improved bus stops, safe pedestrian crossing, and enhanced walking and cycling links around St David's Primary School and the wider village. The site is therefore better aligned with Welsh and local policy on sustainable rural communities, active travel and climate resilience. The Council's A48-to-Colwinston active travel work is intended to improve safe access to bus stops, schools and community facilities and forms part of its wider climate response.

In that context, locating affordable homes where future residents can walk to the school, bus stop and community facilities is a more sustainable outcome than growth that is less well integrated with those everyday destinations. The affordable housing case is compelling. The Vale's Local Housing Market Assessment identifies very substantial affordable housing need, and the RLDP confirms that Colwinston is one of the rural settlements intended to accommodate affordable-housing-led growth. Local lettings policies are also intended to continue in minor rural settlements, helping such homes serve people with genuine local connections and preserving community balance over time.

For those reasons, Site 464 should be preferred as the most appropriate form of growth for Colwinston: modest in scale, affordable-housing-led, related to the existing village form, supportive of the school and community facilities, and more closely aligned with the Council's own strategy for minor rural settlements. If the Council is to allocate growth in Colwinston, it should do so in the form that its own evidence indicates may be appropriate here.

Full text:

Representation in Support of an Affordable Housing-Led Allocation at Land Opposite St David's Church in Wales Primary School, Colwinston (Site 464)

I support the allocation of Site 464, land opposite St David's Church in Wales Primary School, Colwinston, as the most appropriate affordable-housing-led site for the village. The Council's own evidence distinguishes this site from other Colwinston options: while market-led housing here would not be acceptable, the site has expressly been identified as capable of reconsideration for a small-scale affordable-housing-led development, subject to need, viability and agricultural land survey work, at a maximum of 25 dwellings.

This makes Site 464 a better fit with the RLDP strategy than larger countryside sites. The RLDP supports small-scale affordable-housing-led development in minor rural settlements at a scale proportionate to the community, with a minimum of 50% affordable housing, specifically to help younger and working-age households remain in their communities and to sustain local services, including schools. By contrast, the Council's own assessment of land to the east of Colwinston states that it would represent unacceptable intrusion into the open countryside and is at a scale that could not be considered a suitable affordable-housing-led site.

Site 464 is also the stronger option in accessibility and placemaking terms. It sits opposite the village primary school, by the bus stop, and next to an existing footpath. This directly reflects RLDP Objective 8, which seeks development in locations accessible by walking, cycling and public transport and which increase opportunities for active travel.

The Council's own infrastructure evidence for Colwinston refers to improved bus stops, safe pedestrian crossing, and enhanced walking and cycling links around St David's Primary School and the wider village. The site is therefore better aligned with Welsh and local policy on sustainable rural communities, active travel and climate resilience. The Council's A48-to-Colwinston active travel work is intended to improve safe access to bus stops, schools and community facilities and forms part of its wider climate response. In that context, locating affordable homes where future residents can walk to the school, bus stop and community facilities is a more sustainable outcome than growth that is less well integrated with those everyday destinations. The affordable housing case is compelling.

The Vale's Local Housing Market Assessment identifies very substantial affordable housing need, and the RLDP confirms that Colwinston is one of the rural settlements intended to accommodate affordable-housing-led growth. Local lettings policies are also intended to continue in minor rural settlements, helping such homes serve people with genuine local connections and preserving community balance over time. For those reasons, Site 464 should be preferred as the most appropriate form of growth for Colwinston: modest in scale, affordable-housing-led, related to the existing village form, supportive of the school and community facilities, and more closely aligned with the Council's own strategy for minor rural settlements. If the Council is to allocate growth in Colwinston, it should do so in the form that its own evidence indicates may be appropriate here.

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/378

6756 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 464 Land opposite St David's Church in Wales Primary School / Tir gyferbyn ag Ysgol Gynradd yr Eglwys yng Nghymru Dewi Sant

Respondent: Denys Davies [3672]

Summary:

Representation in Support of an Affordable Housing-Led Allocation at Land Opposite St David's Church in Wales Primary School, Colwinston (Site 464) I support the allocation of Site 464, land opposite St David's Church in Wales Primary School, Colwinston, as the most appropriate affordable-housing-led site for the village. The Council's own evidence distinguishes this site from other Colwinston options: while market-led housing here would not be acceptable, the site has expressly been identified as capable of reconsideration for a small-scale affordable-housing-led development, subject to need, viability and agricultural land survey work, at a maximum of 25 dwellings. This makes Site 464 a better fit with the RLDP strategy than larger countryside sites.

The RLDP supports small-scale affordable-housing-led development in minor rural settlements at a scale proportionate to the community, with a minimum of 50% affordable housing, specifically to help younger and working-age households remain in their communities and to sustain local services, including schools. By contrast, the Council's own assessment of land to the east of Colwinston states that it would represent unacceptable intrusion into the open countryside and is at a scale that could not be considered a suitable affordable-housing-led site. Site 464 is also the stronger option in accessibility and placemaking terms. It sits opposite the village primary school, by the bus stop, and next to an existing footpath. This directly reflects RLDP Objective 8, which seeks development in locations accessible by walking, cycling and public transport and which increase opportunities for active travel.

The Council's own infrastructure evidence for Colwinston refers to improved bus stops, safe pedestrian crossing, and enhanced walking and cycling links around St David's Primary School and the wider village. The site is therefore better aligned with Welsh and local policy on sustainable rural communities, active travel and climate resilience. The Council's A48-to-Colwinston active travel work is intended to improve safe access to bus stops, schools and community facilities and forms part of its wider climate response.

In that context, locating affordable homes where future residents can walk to the school, bus stop and community facilities is a more sustainable outcome than growth that is less well integrated with those everyday destinations. The affordable housing case is compelling. The Vale's Local Housing Market Assessment identifies very substantial affordable housing need, and the RLDP confirms that Colwinston is one of the rural settlements intended to accommodate affordable-housing-led growth. Local lettings policies are also intended to continue in minor rural settlements, helping such homes serve people with genuine local connections and preserving community balance over time.

For those reasons, Site 464 should be preferred as the most appropriate form of growth for Colwinston: modest in scale, affordable-housing-led, related to the existing village form, supportive of the school and community facilities, and more closely aligned with the Council's own strategy for minor rural settlements. If the Council is to allocate growth in Colwinston, it should do so in the form that its own evidence indicates may be appropriate here.

Full text:

Representation in Support of an Affordable Housing-Led Allocation at Land Opposite St David's Church in Wales Primary School, Colwinston (Site 464) I support the allocation of Site 464, land opposite St David's Church in Wales Primary School, Colwinston, as the most appropriate affordable-housing-led site for the village. The Council's own evidence distinguishes this site from other Colwinston options: while market-led housing here would not be acceptable, the site has expressly been identified as capable of reconsideration for a small-scale affordable-housing-led development, subject to need, viability and agricultural land survey work, at a maximum of 25 dwellings. This makes Site 464 a better fit with the RLDP strategy than larger countryside sites.

The RLDP supports small-scale affordable-housing-led development in minor rural settlements at a scale proportionate to the community, with a minimum of 50% affordable housing, specifically to help younger and working-age households remain in their communities and to sustain local services, including schools. By contrast, the Council's own assessment of land to the east of Colwinston states that it would represent unacceptable intrusion into the open countryside and is at a scale that could not be considered a suitable affordable-housing-led site. Site 464 is also the stronger option in accessibility and placemaking terms. It sits opposite the village primary school, by the bus stop, and next to an existing footpath. This directly reflects RLDP Objective 8, which seeks development in locations accessible by walking, cycling and public transport and which increase opportunities for active travel.

The Council's own infrastructure evidence for Colwinston refers to improved bus stops, safe pedestrian crossing, and enhanced walking and cycling links around St David's Primary School and the wider village. The site is therefore better aligned with Welsh and local policy on sustainable rural communities, active travel and climate resilience. The Council's A48-to-Colwinston active travel work is intended to improve safe access to bus stops, schools and community facilities and forms part of its wider climate response.

In that context, locating affordable homes where future residents can walk to the school, bus stop and community facilities is a more sustainable outcome than growth that is less well integrated with those everyday destinations. The affordable housing case is compelling. The Vale's Local Housing Market Assessment identifies very substantial affordable housing need, and the RLDP confirms that Colwinston is one of the rural settlements intended to accommodate affordable-housing-led growth. Local lettings policies are also intended to continue in minor rural settlements, helping such homes serve people with genuine local connections and preserving community balance over time.

For those reasons, Site 464 should be preferred as the most appropriate form of growth for Colwinston: modest in scale, affordable-housing-led, related to the existing village form, supportive of the school and community facilities, and more closely aligned with the Council's own strategy for minor rural settlements. If the Council is to allocate growth in Colwinston, it should do so in the form that its own evidence indicates may be appropriate here.

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/37d

5523 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 468 Land to the south of Llangan Primary School. / Tir i'r de o Ysgol Gynradd Llan-gan.

Respondent: Mrs Francesca Dixon [3275]

Summary:

See comments previously given for sites to the north of West Winds Trading Estate Llangan

Full text:

See comments previously given for sites to the north of West Winds Trading Estate Llangan

Attachments: None

5574 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 468 Land to the south of Llangan Primary School. / Tir i'r de o Ysgol Gynradd Llan-gan.

Respondent: Mr Ian Richards [3301]

Summary:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Full text:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Attachments: None

5586 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 468 Land to the south of Llangan Primary School. / Tir i'r de o Ysgol Gynradd Llan-gan.

Respondent: Mr David Hammond [1410]

Summary:

I note that the site is too close to Llangan School, restricting its expansion and limiting capacity for additional children. Located in the rural Vale, seven miles from Cowbridge and eight from Bridgend, the site's scale is out of character with the area. Residents are likely to rely on private cars for commuting and shopping, as public transport options are limited, with the nearest shop in Pencoed and larger supermarkets requiring travel to Cowbridge or Bridgend.

Full text:

The site is too close to Llangan School and would prohibit the school from expanding its play area or car park. The school has limited capacity for additional children. The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

5962 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 468 Land to the south of Llangan Primary School. / Tir i'r de o Ysgol Gynradd Llan-gan.

Respondent: Llangan Community Council (Clerk) [239]

Summary:

I note that the site is in the rural Vale, near Llangan, surrounded by open countryside, and distant from nearby towns. Residents would need private cars to access work, shops, and amenities, as the primary school is within walking distance but on an unlit road without pavements. The nearest shop is in Pencoed, with no public transport, requiring driving to larger towns or supermarkets. Access is via narrow country roads unsuitable for high traffic volumes or emergency vehicles.

Full text:

The site is located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the close by hamlet of Llangan . Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school that is within walking distance via an unlit road with no pavements. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

6250 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 468 Land to the south of Llangan Primary School. / Tir i'r de o Ysgol Gynradd Llan-gan.

Respondent: Mrs Juliana Wines [3503]

Summary:

I note that the site is too close to Llangan School, restricting its expansion and limiting capacity for additional children. Located in the rural Vale, 7 miles from Cowbridge and 8 miles from Bridgend, its scale is out of character with the area. Residents would rely on private cars for commuting, shopping, and other needs, as public transport options are limited or unavailable, with the nearest shop in Pencoed and larger centres requiring driving.

Full text:

The site is too close to Llangan School and would prohibit the school from expanding its play area or car park. The school has limited capacity for additional children. The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

6333 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 468 Land to the south of Llangan Primary School. / Tir i'r de o Ysgol Gynradd Llan-gan.

Respondent: Mr Richard Brian Antuch [3065]

Summary:

I believe the site conflicts with the RLDP's sustainable spatial strategy, as it is poorly related to existing settlement patterns and risks fragmented growth. Its location is unsustainable, with limited access to services and public transport, increasing reliance on private cars. The site would harm the landscape and settlement character, especially near valued countryside, and does not support high-quality placemaking. Infrastructure capacity is uncertain, and the need for the site is unproven, particularly when considering nearby candidate sites. These issues collectively suggest the site should be removed from the plan or the plan found unsound.

Full text:

1. Conflict with the RLDP Spatial Strategy
1.1 The RLDP’s spatial strategy seeks to direct housing growth to sustainable locations, prioritising:
1.1.1 Well-connected settlements;
1.1.2 Locations with good access to services, facilities and employment; and
1.1.3 Development that reinforces, rather than undermines, settlement form.
1.2 The Site:
1.2.1 Is poorly related to the existing settlement patterns;
1.2.2 Represents an outward expansion that risks fragmented or dispersed growth; and
1.2.3 Does not clearly demonstrate how development would integrate with the existing built form in a manner consistent with the Plan’s strategy.
1.3 The location of the site therefore undermines the RLDP’s stated approach to sustainable growth and settlement hierarchy.

2. Unsustainable location and transport accessibility
2.1 Planning Policy Wales requires development to minimise the need to travel and to prioritise active travel and sustainable transport.
2.2 In respect of the Site:
2.2.1 There is insufficient evidence that the site is located within convenient walking distance of everyday services and facilities;
2.2.2 Public transport is essentially non-existent; and
2.2.3 Development would be likely to result in increased reliance on private car travel, contrary to the national policy and the VOG’s climate objectives.
2.3 The RLDP evidence base does not robustly demonstrate that these sites can support genuine modal shift or deliver sustainable travel patterns.

3. Landscape, countryside and settlement character
3.1 The VOG is characterised by a sensitive and distinctive landscape, with clear settlement edges and areas of open countryside, contributing to local character.
3.2 The allocation of the Site would:
3.2.1 Result in the loss of undeveloped land that performs an important landscape and/ or settlement function;
3.2.2 Risk erosion of settlement identity through incremental outward expansion; and
3.2.3 Cause harm to the visual and rural setting of affected communities.

3.3 Where sites lie within or adjacent to Special Landscape Areas of valued countryside, national and local policy requires strong justification. That justification has not been demonstrated.

4. Failure to deliver high-quality placemaking
4.1 Placemaking is identified in the RLDP as a central objective. However, the Site raises significant concerns in this regard:
4.1.1 The location and constraints risk development that is peripheral, car-dominated and poorly integrated;
4.1.2 Opportunities to create walkable neighbourhoods with a strong sense of place appear limited; and
4.1.3 There is a real risk that development would result in standardised estate layouts, rather than distinctive, locally responsive places.
4.2 The evidence does not show that development on these sites could achieve the quality of placemaking required by the national policy and RLDP.

5. Infrastructure capacity and deliverability
5.1 For the Site to be soundly allocated, the VOG must demonstrate that they it is deliverable within the plan period and supported by appropriate infrastructure.
5.2 In relation to the Site:
5.2.1 There is insufficient clarity regarding highway capacity, safe access and mitigation;
5.2.2 Local services and facilities are already under pressure, with no firm delivery strategy identified;
5.2.3 The infrastructure implication of allocating multiple sites in proximity have not been adequately addressed (as there are other candidate sites close by, namely 398, 401, 403, 2671 & 4057).
5.3 As such, the effectiveness and deliverability of the allocation is not demonstrated.

6. Failure to justify the need for the Site
6.1 The RLDP must show that the Site allocation is necessary, having regard to reasonable alternatives.
6.2 The evidence does not demonstrate that:
6.2.1 More suitable or less sensitive sites have been exhausted;
6.2.2 Previous development land opportunities have been prioritised to the extent required by national policy; or
6.2.3 The Site is required to meet identified housing need.
6.3 Without such justification, the allocation of the Site fails the tests of soundness.

7. Cumulative impact
7.1 When considered collectively with other candidate sites in close proximity to the Site (namely candidate sites 398, 401, 403, 2671 & 4057), allocation of the Site would result in:
7.1.1 Excessive growth pressure on certain settlements;
7.1.2 Incremental erosion of countryside and landscape character; and
7.1.3 Development that is inconsistent with a plan-led, sustainable strategy.
7.2 The cumulative impacts have not been adequately assessed or addressed.

8. Conclusion
8.1 For the reasons set out above, the Site is:
8.1.1 Unsustainably located;
8.1.2 Likely to cause unacceptable harm to landscape and settlement character;
8.1.3 Inadequately supported by infrastructure and deliverability evidence; and
8.1.4 Not justified by housing need or the consideration of alternatives.
8.2 The Site should therefore be removed from the RLDP, or the Plan found unsound insofar as it relies upon its allocation.

Attachments:
Representation Form - https://valeofglamorgan.oc2.uk/a/thk

4443 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 474 Land at Colwinston / Tir yn Nhregolwyn

Respondent: Mr Tom Prosser [2778]

Summary:
The village lacks severe infrastructure to accommodate this type of development

Full text:
The village lacks severe infrastructure to accommodate this type of development

Attachments: None

4544 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 474 Land at Colwinston / Tir yn Nhregolwyn

Respondent: Mr Rob G Thomas [683]

Summary:

Parcel 474 site would have a substantial impact and intrusion into the open Countryside, being detrimental and with increased contribution to climate change .

No indication of Market or Affordable led inclusion.

NO DVM supplied.

NO Active travel supported.

Loss of BVM under ALC Wales Classification.

No site access suitable unless unacceptable demolition or new creation applied that would severely impact existing properties and highway.

Full text:

Parcel 474 site would have a substantial impact and intrusion into the open Countryside, being detrimental and with increased contribution to climate change .

No indication of Market or Affordable led inclusion.

NO DVM supplied.

NO Active travel supported.

Loss of BVM under ALC Wales Classification.

No site access suitable unless unacceptable demolition or new creation applied that would severely impact existing properties and highway.

Attachments: None

4930 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 474 Land at Colwinston / Tir yn Nhregolwyn

Respondent: Mrs Karen Jacobs [2746]

Summary:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Full text:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Attachments: None

5926 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 475 Beggars Bush - Land off (East of) St Athan Road / Tir oddi ar (i'r dwyrain o) Sain Tathan Road

Respondent: Lindsey Bulleid [2240]

Summary:

Environmentally I feel this is an inappropriate area to develop. The site lies within the Thaw Valley Special Landscape Area, and development would damage its rural character, biodiversity, and open views, undermining Cowbridge's landscape and sense of place which is against the Vale of Glamorgan's goals. Other, more suburban sites would be more suitable for development.
The transport infrastructure is not supportive of housing here. The St Athan road is small, windy, dangerous with no footpath. There is no public transport within easy walking distance. Amenities are also not within safe or easy walking distance and will necessitate people driving into Cowbridge. This is completely against the Vale's own goals and ideation when it comes to sustainable and appropriate development. Conversely, sites 455 and 367 are well connected with safe easy walking routes into the town centre, and access to public transport and local amenities.
As outlined in the Cowbridge Placemaking Plan, local identity, sustainable growth, and protection/enhancement of town character, public spaces and the town-edge environment is incredibly important.
Building on these sites in this unspoilt valley is contrary to these principles and undermines local placemaking desires. There must be sites that are more coherent with the ideals and values of the area?

Full text:

I would like to express my objection to development of the proposed Bryn Melin site 370.

Environmentally I feel this is an inappropriate area to develop. The site (and adjoining sites 475/514) are within the Thaw valley designated special landscape area which should be protected.
Development here would destroy the character of the area and significantly impact negatively on the biodiversity and the natural lived experience of the people within Cowbridge. This is against the vale of Glamorgan's goals to respect landscape a resource, respect scenic quality of an area, respect unspoilt character and integrity, respect the sense of place created by landscape and to conserve these attributes. The valley and the fields, the view, the sense of open space, the footpaths that people can use to walk and enjoy being in nature right next the Cowbridge town are all integral to the sense of character and place of Cowbridge. This section of the valley currently stands alone as a natural vista, and does not have encroachment of suburban development. It is enjoyed by so many. You stand in it and look out, you walk through it, and you can be entirely in the countryside. This is a significant characteristic of a rural town such as Cowbridge and losing this here will represent suburban creep and destruction of this natural character. These attributes would be ruined by development here. I believe other proposed sites such as sites 455 and 367 are better suited to development as these areas are already partially suburbanised and do not have the unspoilt rural views/space/character that the bryn melin and associated sites do.

Ultimately, there is no development currently on the Bryn Melin site, whereas there is already some development within the area of the sites 455 and 367.

Functionally I also have significant concerns about development of Bryn Melin site 370 and the adjoining sites 475 and 514. The transport infrastructure is not supportive of housing here. The St Athan road is small, windy, dangerous with no footpath. There is no public transport within easy walking distance. Amenities are also not within safe or easy walking distance and will necessitate people driving into Cowbridge. This is completely against the Vale's own goals and ideation when it comes to sustainable and appropriate development. Conversely sites 455 and 367 are well connected with safe easy walking routes into the town centre, and access to public transport.

The site at Bryn Melin is also very steep which environmentally and socially is not a good characteristic for development. The slope is 12% and there is poor access. Again, the sites proposed at 455 and 367 appear more suitable for development with better developed access to the local amenities.

Cowbridge Town Council unanimously rejected the inclusion of Site 370 in the RLDP on 24/02/2026
As outlined in the Cowbridge Placemaking Plan, local identity, sustainable growth, and protection/enhancement of town character, public spaces and the town-edge environment is incredibly important.
Building on these sites in this unspoilt valley is contrary to these principles and undermines local placemaking desires. There must be sites that are more coherent with the ideals and values of the area?

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t8n

5970 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 475 Beggars Bush - Land off (East of) St Athan Road / Tir oddi ar (i'r dwyrain o) Sain Tathan Road

Respondent: Lindsey Bulleid [2240]

Summary:

[Objection on behalf of 10 year old] I would like to object to houses being built here because I really like walking and playing in the field with my family. I also like the amazing view out across the field and all the other fields. During the day time I've seen a peregrine falcon a few times so I think he must live in the area. I would be so sad to lose my friend and the lovely space he flies around in. We walk across and down the St Athan road when we walk to st Hilary, that bit of road always feels really dangerous. It is tight and bendy, there is no footpath, and you can't see the cars coming. This would be really bad if lots of cars were driving there because of lots of new houses. There are no buses that people could use and the road is very steep. It doesn't seem like a good place for lots of new houses. It's a special place where there's lots of wildlife and you can feel like you're just in the countryside. There must be somewhere better to build the houses on.

Full text:

I would like to object to the development of the Bryn Melin field (site 370 and 475).
I would like to object to houses being built here because I really like walking and playing in the field with my family. I also like the amazing view out across the field and all the other fields. At night time there is very little light and you can see lots of stars. I've even seen some shooting stars. During the day time I've seen a peregrine falcon a few times so I think he must live in the area. I would be so sad to lose my friend and the lovely space he flies around in. We walk across and down the St Athan road when we walk to st Hilary, and that bit of road always feels really dangerous. It is tight and bendy , there is no footpath, and you can't see the cars coming. This would be really bad if lots of cars were driving there because of lots of new houses. There are no buses that people could use and the road is very steep. It doesn't seem like a good place for lots of new houses. It's a special place where there's lots of wildlife and you can feel like you're just in the countryside. There must be somewhere better to build the houses on.

Attachments:

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

5976 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 475 Beggars Bush - Land off (East of) St Athan Road / Tir oddi ar (i'r dwyrain o) Sain Tathan Road

Respondent: Lindsey Bulleid [2240]

Summary:

[Objection on behalf of 7 year old] I would like object to houses being built here because I love walking in the fields and seeing the wildlife. I've seen a kingfisher and there's an owl who lives there too and lots of other wildlife. The fields are very peaceful and I love the view. I don't get why you'd build on the field, it would really spoil the countryside. There aren't any houses or buildings there at the moment and I enjoy the stars at night time because it is much darker than in the town. The road at the bottom is very twisty and there are lots of blind bends. I've done road safety with school and it isn't a safe road for people to walk on, and isn't a big road for lots of people to be driving on. It doesn't seem very good for lots of houses to be using. Please find somewhere else.

Full text:

I would like to object to the development of the Bryn Melin field (site 370 and 475).
I would like object to houses being built here because I love walking in the fields and seeing the wildlife. I've seen a kingfisher and there's an owl who lives there too. And lots of other wildlife. The fields are very peaceful and I love the view. I don't get why you'd build on the field, it would really spoil the countryside. There aren't any houses or buildings there at the moment and I enjoy the stars at night time because it is much darker than in the town. The road at the bottom is very twisty and there are lots of blind bends. I've done road safety with school and it isn't a safe road for people to walk on, and isn't a big road for lots of people to be driving on. It doesn't seem very good for lots of houses to be using. Please find somewhere else.

Attachments:

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

6036 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 475 Beggars Bush - Land off (East of) St Athan Road / Tir oddi ar (i'r dwyrain o) Sain Tathan Road

Respondent: Mrs Susannah Thomas [3454]

Summary:

Access too dangerous. Do not put in LDP.

Full text:

Access too dangerous. Do not put in LDP.

Attachments: None

7143 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 475 Beggars Bush - Land off (East of) St Athan Road / Tir oddi ar (i'r dwyrain o) Sain Tathan Road

Respondent: Mrs Pamela Kay [3572]

Summary:

I would like to object to the development of the Bryn Melin field (site 370, and adjoining sites 475 and 514).
The site is within the thaw valley designated special landscape area and has uninterrupted views and access to nature. There is currently no development/suburban creep in this vicinity and developing here would destroy that. Other alternative sites (eg 455 and 367) appear better suited as they are already adjacent to suburban sprawl.
I am also particularly interested in astronomy. This area of Cowbridge, as it is a valley with no development, has significantly less light pollution than other more suburbanised areas. This is a valuable and a relatively rare resource so close to a town. Development here would destroy this.
I also do not feel the site is appropriate for a housing development. The site itself is very steep and the St Athan road is steep, narrow, with blind bends and no footpaths and no public transport. There is no easily accessible local access to jobs/amenities.
Please retain this site within open countryside and protect it for people to enjoy, for the wildlife and diversity that currently lives there, and to maintain the character of the area.

Full text:

I would like to object to the development of the Bryn Melin field (site 370, and adjoining sites 475 and 514)
This site is not as well suited as alternative sites (such as 455 and 367), and directly contravenes the placemaking goals and priorities of the area.
The site is within the thaw valley designated special landscape area and has uninterrupted views and access to nature. There is currently no development/suburban creep in this vicinity and developing here would destroy that. Other alternative sites (eg 455 and 367) appear better suited as they are already adjacent to suburban sprawl.
I am also particularly interested in astronomy. This area of Cowbridge, as it is a valley with no development, has significantly less light pollution than other more suburbanised areas. This is a valuable and a relatively rare resource so close to a town. Development here would destroy this.
I also do not feel the site is appropriate for a housing development. The site itself is very steep and the St Athan road is steep, narrow, with blind bends and no footpaths and no public transport. There is no easily accessible local access to jobs/amenities. Other sites (e.g 455 and 367) seem better suited to development as they have better access/transport links and already have adjacent suburban sprawl.
Please retain this site within open countryside and protect it for people to enjoy, for the wildlife and diversity that currently lives there, and to maintain the character of the area.

Attachments:

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

6831 Comment

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 511 Old Beaupre Farm / Fferm y Bewpyr

Respondent: National Grid Electricity Transmission (Planning Enquiries) [582]

Summary:

This candidate site has NGET assets interacting with it:

ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

Full text:

Vale of Glamorgan Replacement Local Development Plan 2021-2036: Deposit Plan Consultation – March 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site Asset Description

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
Aberthaw leasehold land
ABERTHAW 132KV S/S
ABERTHAW 275KV S/S
SGT2 275KV CABLE: ABERTHAW 275KV S/S
UPPER BOAT 1 275kV CABLE: ABERTHAW 275KV S/S
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 516 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 577 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 513 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 511 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 517 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

Candidate site 515 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
A significant number of NGET assets – including substations – fall within Employment Opportunity Area 1, as designated within Policy EMP1. This site also appears as site 433 on the candidate sites map.

NGET do not consider that proposals of EMP1 are necessarily in conflict with these assets and are keen to ensure development is able to come forward even where its assets are present within or adjacent to an allocation. However, it is critical that the presence of these assets is suitably addressed within the supporting policy wording if Policy EMP1 is to be considered effective as otherwise the presence of NGET assets without appropriate acknowledgement will amount to significant constraints on site delivery. In particular, the electrical substations require 24/7 access including for 'abnormal indivisible loads' (AIL) and the land immediately surrounding them is also critical to their safe and secure functioning and to accommodate any change in future requirements which may arise.

It is acknowledged that, as part of masterplanning principles set out at 6.281, the policy already makes mention of existing infrastructure assets within the site and a need for a site layout to be developed that considers the sites existing infrastructure (including electrical substations) however we consider that the policy needs to go further and acknowledge the wider range of NGET assets that are within the site as well as more clearly establish how any future development needs to respond to the presence of NGET assets within the site. With this in mind, we propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

"Development will include a strategy for responding to the NGET Substations, Overhead and Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Without appropriate acknowledgement of the NGET assets present within the sites, Policy EMP1 should not be considered effective as it cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. As such, NGET object to the policy as currently drafted.

Renewable Energy Candidate Sites

A number of 'candidate sites' as included on the candidate site mapping, as listed in the above table, have NGET assets interacting with them. Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

• Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations.
• Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
• Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.
• Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
• Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.
• Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.
If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.
To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.
We would be grateful if you could add our details shown below to your consultation database, if not already included.

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.
Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.
NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.
NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here:
https://www.nationalgrid.com/document/349291/download
How to contact NGET
If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

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

5418 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 512 Pant Wilkin Stables / Stablau Pant Wilkin

Respondent: Ms Jenny Hughes [3251]

Summary:

Agricultural land
Area important for biodiversity and nature
Poor drainage
Landowner has already built many houses and units without planning permission, history of flouting Welsh planning law
Road would exit directly onto the busy A48 at a corner
No public transport & few employment opportunities.
Out with Aberthin village boundary and not attached to any preexisting village or community structure.
Local schools and GP surgery already beyond capacity

Full text:

Agricultural land
Area important for biodiversity and nature
Poor drainage
Landowner has already built many houses and units without planning permission, history of flouting Welsh planning law
Road would exit directly onto the busy A48 at a corner
No public transport & few employment opportunities.
Out with Aberthin village boundary and not attached to any preexisting village or community structure.
Local schools and GP surgery already beyond capacity

Attachments: None

5422 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 512 Pant Wilkin Stables / Stablau Pant Wilkin

Respondent: Mr Brian Minchin [3254]

Summary:

Inappropriate for rural and agricultural area.
Will change nature of views from popular walks on Stalling Down.
History of repeated planning enforcement issues on site. Low confidence in a responsible and sensitive development.
Evidence of scattergun and unstrategic development on site, inappropriate for a major candidate site.

Full text:

Inappropriate for rural and agricultural area.
Will change nature of views from popular walks on Stalling Down.
History of repeated planning enforcement issues on site. Low confidence in a responsible and sensitive development.
Evidence of scattergun and unstrategic development on site, inappropriate for a major candidate site.

Attachments: None

5423 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 512 Pant Wilkin Stables / Stablau Pant Wilkin

Respondent: Mrs Linda Edwards [3253]

Summary:

I strongly object to any proposed development which will further erode this green area in the Vale to the detriment of local residents and wildlife. We need to protect those few green spaces left and to allow some regeneration of the natural landscape within this valley.

Full text:

I strongly object to any proposed development which will further erode this green area in the Vale to the detriment of local residents and wildlife. We need to protect those few green spaces left and to allow some regeneration of the natural landscape within this valley.

Attachments: None

6168 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 512 Pant Wilkin Stables / Stablau Pant Wilkin

Respondent: Ms Louise Milton [3485]

Summary:

I oppose the proposed housing development in the Vale of Glamorgan because I am concerned about the pressure it could place on local infrastructure and services. Roads in the area are already busy, and additional housing is likely to increase traffic and congestion. I am also worried about the loss of green space and the impact this could have on local wildlife and the rural character of the area. Schools, GP surgeries, and other services are already stretched, and without clear investment in infrastructure to support growth, this development risks reducing the quality of life for existing residents.

Full text:

I oppose the proposed housing development in the Vale of Glamorgan because I am concerned about the pressure it could place on local infrastructure and services. Roads in the area are already busy, and additional housing is likely to increase traffic and congestion. I am also worried about the loss of green space and the impact this could have on local wildlife and the rural character of the area. Schools, GP surgeries, and other services are already stretched, and without clear investment in infrastructure to support growth, this development risks reducing the quality of life for existing residents.

Attachments: None

6830 Comment

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 513 St Hilary Farm / Fferm Saint Hilari

Respondent: National Grid Electricity Transmission (Planning Enquiries) [582]

Summary:

This candidate site has NGET assets interacting with it:

ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

Full text:

Vale of Glamorgan Replacement Local Development Plan 2021-2036: Deposit Plan Consultation – March 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site Asset Description

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
Aberthaw leasehold land
ABERTHAW 132KV S/S
ABERTHAW 275KV S/S
SGT2 275KV CABLE: ABERTHAW 275KV S/S
UPPER BOAT 1 275kV CABLE: ABERTHAW 275KV S/S
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 516 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 577 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 513 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 511 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 517 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

Candidate site 515 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
A significant number of NGET assets – including substations – fall within Employment Opportunity Area 1, as designated within Policy EMP1. This site also appears as site 433 on the candidate sites map.

NGET do not consider that proposals of EMP1 are necessarily in conflict with these assets and are keen to ensure development is able to come forward even where its assets are present within or adjacent to an allocation. However, it is critical that the presence of these assets is suitably addressed within the supporting policy wording if Policy EMP1 is to be considered effective as otherwise the presence of NGET assets without appropriate acknowledgement will amount to significant constraints on site delivery. In particular, the electrical substations require 24/7 access including for 'abnormal indivisible loads' (AIL) and the land immediately surrounding them is also critical to their safe and secure functioning and to accommodate any change in future requirements which may arise.

It is acknowledged that, as part of masterplanning principles set out at 6.281, the policy already makes mention of existing infrastructure assets within the site and a need for a site layout to be developed that considers the sites existing infrastructure (including electrical substations) however we consider that the policy needs to go further and acknowledge the wider range of NGET assets that are within the site as well as more clearly establish how any future development needs to respond to the presence of NGET assets within the site. With this in mind, we propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

"Development will include a strategy for responding to the NGET Substations, Overhead and Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Without appropriate acknowledgement of the NGET assets present within the sites, Policy EMP1 should not be considered effective as it cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. As such, NGET object to the policy as currently drafted.

Renewable Energy Candidate Sites

A number of 'candidate sites' as included on the candidate site mapping, as listed in the above table, have NGET assets interacting with them. Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

• Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations.
• Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
• Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.
• Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
• Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.
• Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.
If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.
To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.
We would be grateful if you could add our details shown below to your consultation database, if not already included.

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.
Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.
NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.
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How to contact NGET
If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

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

5927 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 514 Land East of St.Athan Road. / Tir i'r dwyrain o St.Tathan Road.

Respondent: Lindsey Bulleid [2240]

Summary:

Environmentally I feel this is an inappropriate area to develop. The site lies within the Thaw Valley Special Landscape Area, and development would damage its rural character, biodiversity, and open views, undermining Cowbridge's landscape and sense of place which is against the Vale of Glamorgan's goals. Other, more suburban sites would be more suitable for development.
The transport infrastructure is not supportive of housing here. The St Athan road is small, windy, dangerous with no footpath. There is no public transport within easy walking distance. Amenities are also not within safe or easy walking distance and will necessitate people driving into Cowbridge. This is completely against the Vale's own goals and ideation when it comes to sustainable and appropriate development. Conversely, sites 455 and 367 are well connected with safe easy walking routes into the town centre, and access to public transport and local amenities.
As outlined in the Cowbridge Placemaking Plan, local identity, sustainable growth, and protection/enhancement of town character, public spaces and the town-edge environment is incredibly important.
Building on these sites in this unspoilt valley is contrary to these principles and undermines local placemaking desires. There must be sites that are more coherent with the ideals and values of the area?

Full text:

I would like to express my objection to development of the proposed Bryn Melin site 370.

Environmentally I feel this is an inappropriate area to develop. The site (and adjoining sites 475/514) are within the Thaw valley designated special landscape area which should be protected.
Development here would destroy the character of the area and significantly impact negatively on the biodiversity and the natural lived experience of the people within Cowbridge. This is against the vale of Glamorgan's goals to respect landscape a resource, respect scenic quality of an area, respect unspoilt character and integrity, respect the sense of place created by landscape and to conserve these attributes. The valley and the fields, the view, the sense of open space, the footpaths that people can use to walk and enjoy being in nature right next the Cowbridge town are all integral to the sense of character and place of Cowbridge. This section of the valley currently stands alone as a natural vista, and does not have encroachment of suburban development. It is enjoyed by so many. You stand in it and look out, you walk through it, and you can be entirely in the countryside. This is a significant characteristic of a rural town such as Cowbridge and losing this here will represent suburban creep and destruction of this natural character. These attributes would be ruined by development here. I believe other proposed sites such as sites 455 and 367 are better suited to development as these areas are already partially suburbanised and do not have the unspoilt rural views/space/character that the bryn melin and associated sites do.

Ultimately, there is no development currently on the Bryn Melin site, whereas there is already some development within the area of the sites 455 and 367.

Functionally I also have significant concerns about development of Bryn Melin site 370 and the adjoining sites 475 and 514. The transport infrastructure is not supportive of housing here. The St Athan road is small, windy, dangerous with no footpath. There is no public transport within easy walking distance. Amenities are also not within safe or easy walking distance and will necessitate people driving into Cowbridge. This is completely against the Vale's own goals and ideation when it comes to sustainable and appropriate development. Conversely sites 455 and 367 are well connected with safe easy walking routes into the town centre, and access to public transport.

The site at Bryn Melin is also very steep which environmentally and socially is not a good characteristic for development. The slope is 12% and there is poor access. Again, the sites proposed at 455 and 367 appear more suitable for development with better developed access to the local amenities.

Cowbridge Town Council unanimously rejected the inclusion of Site 370 in the RLDP on 24/02/2026
As outlined in the Cowbridge Placemaking Plan, local identity, sustainable growth, and protection/enhancement of town character, public spaces and the town-edge environment is incredibly important.
Building on these sites in this unspoilt valley is contrary to these principles and undermines local placemaking desires.
There must be sites that are more coherent with the ideals and values of the area?

Attachments:
Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t8n

6037 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 514 Land East of St.Athan Road. / Tir i'r dwyrain o St.Tathan Road.

Respondent: Mrs Susannah Thomas [3454]

Summary:

Access too dangerous. Do not put in LDP.

Full text:

Access too dangerous. Do not put in LDP.

Attachments: None

7146 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 514 Land East of St.Athan Road. / Tir i'r dwyrain o St.Tathan Road.

Respondent: Mrs Pamela Kay [3572]

Summary:

I would like to object to the development of the Bryn Melin field (site 370, and adjoining sites 475 and 514). The site is within the thaw valley designated special landscape area and has uninterrupted views and access to nature. There is currently no development/suburban creep in this vicinity and developing here would destroy that. I am also particularly interested in astronomy. This area of Cowbridge, as it is a valley with no development, has significantly less light pollution than other more suburbanised areas. This is a valuable and a relatively rare resource so close to a town. Development here would destroy this.
I also do not feel the site is appropriate for a housing development. The site itself is very steep and the St Athan road is steep, narrow, with blind bends and no footpaths and no public transport. There is no easily accessible local access to jobs/amenities. Please retain this site within open countryside and protect it for people to enjoy, for the wildlife and diversity that currently lives there, and to maintain the character of the area.

Full text:

I would like to object to the development of the Bryn Melin field (site 370, and adjoining sites 475 and 514)
This site is not as well suited as alternative sites (such as 455 and 367), and directly contravenes the placemaking goals and priorities of the area.
The site is within the thaw valley designated special landscape area and has uninterrupted views and access to nature. There is currently no development/suburban creep in this vicinity and developing here would destroy that. Other alternative sites (eg 455 and 367) appear better suited as they are already adjacent to suburban sprawl.
I am also particularly interested in astronomy. This area of Cowbridge, as it is a valley with no development, has significantly less light pollution than other more suburbanised areas. This is a valuable and a relatively rare resource so close to a town. Development here would destroy this.
I also do not feel the site is appropriate for a housing development. The site itself is very steep and the St Athan road is steep, narrow, with blind bends and no footpaths and no public transport. There is no easily accessible local access to jobs/amenities. Other sites (e.g 455 and 367) seem better suited to development as they have better access/transport links and already have adjacent suburban sprawl.
Please retain this site within open countryside and protect it for people to enjoy, for the wildlife and diversity that currently lives there, and to maintain the character of the area.

Attachments:

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

6038 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 555 Land off Vale Court, Cowbridge, Vale of Glamorgan / Tir oddi ar Vale Court, Y Bont-faen, Bro Morgannwg

Respondent: Mrs Susannah Thomas [3454]

Summary:

Access too dangerous. Do not put in LDP.

Full text:

Access too dangerous. Do not put in LDP.

Attachments: None

6169 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 555 Land off Vale Court, Cowbridge, Vale of Glamorgan / Tir oddi ar Vale Court, Y Bont-faen, Bro Morgannwg

Respondent: Ms Louise Milton [3485]

Summary:

I oppose the proposed housing development in the Vale of Glamorgan because I am concerned about the pressure it could place on local infrastructure and services. Roads in the area are already busy, and additional housing is likely to increase traffic and congestion. I am also worried about the loss of green space and the impact this could have on local wildlife and the rural character of the area. Schools, GP surgeries, and other services are already stretched, and without clear investment in infrastructure to support growth, this development risks reducing the quality of life for existing residents.

Full text:

I oppose the proposed housing development in the Vale of Glamorgan because I am concerned about the pressure it could place on local infrastructure and services. Roads in the area are already busy, and additional housing is likely to increase traffic and congestion. I am also worried about the loss of green space and the impact this could have on local wildlife and the rural character of the area. Schools, GP surgeries, and other services are already stretched, and without clear investment in infrastructure to support growth, this development risks reducing the quality of life for existing residents.

Attachments: None

4429 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 565 Land at Nant Canna, Treoes, Option 2 / Tir yn Nant Canna, Tre- os, opsiwn 2

Respondent: Mrs Emily Ham [2769]

Summary:

I object to any housing development in our village of Treoes. There is no need for additional housing or developments in our small rural village.

Full text:

I object to any housing development in our village of Treoes. There is no need for additional housing or developments in our small rural village.

Attachments: None

5524 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 565 Land at Nant Canna, Treoes, Option 2 / Tir yn Nant Canna, Tre- os, opsiwn 2

Respondent: Mrs Francesca Dixon [3275]

Summary:

The same comments apply as for the alternative option for the site at Nant Canna Treoes.

Full text:

The same comments apply as for the alternative option for the site at Nant Canna Treoes.

Attachments: None

5575 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 565 Land at Nant Canna, Treoes, Option 2 / Tir yn Nant Canna, Tre- os, opsiwn 2

Respondent: Mr Ian Richards [3301]

Summary:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Full text:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Attachments: None

6247 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 565 Land at Nant Canna, Treoes, Option 2 / Tir yn Nant Canna, Tre- os, opsiwn 2

Respondent: Mrs Juliana Wines [3503]

Summary:

I note that the sites are in a rural Vale area, far from Cowbridge and Bridgend, with a scale that is out of character with the surroundings. Residents would depend on private vehicles for commuting to work, shopping, and education, as there is no public transport to the nearest shop in Pencoed. Access is via narrow country lanes unsuitable for heavy traffic or emergency vehicles.

Full text:

The site are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops primary school in Llangan. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

4444 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 2782 Pantiles Field, Colwinston/Pantiles Field, Tregolwyn

Respondent: Mr Tom Prosser [2778]

Summary:

The village lacks severe infrastructure to accommodate this type of development

Full text:

The village lacks severe infrastructure to accommodate this type of development

Attachments: None

4558 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 2782 Pantiles Field, Colwinston/Pantiles Field, Tregolwyn

Respondent: Mr Rob G Thomas [683]

Summary:

Supports Active Travel Wales 2013 Act policies Objective 8 2.12 and 2.13 route identifies on Hold by VoGCC for completion with existing footpath adjacent to site.

Supports and mitigate effects of climate change.

Supports access to retail as adjoining commercial business

ALC Wales states lowest BMV loss of ALL candidate sites and should be priority as policies and methodology state.

LH/MA state Clear need for affordable homes in Llandow Ward thus important contribution to that target 100% affordable RSL led scheme with supported DVM .

Not in open countryside as adjacent to recreational area.

Most Appropriate to community it serves.

Full text:

Supports Active Travel Wales 2013 Act policies Objective 8 2.12 and 2.13 route identifies on Hold by VoGCC for completion with existing footpath adjacent to site.

Supports and mitigate effects of climate change.

Supports access to retail as adjoining commercial business

ALC Wales states lowest BMV loss of ALL candidate sites and should be priority as policies and methodology state.

LH/MA state Clear need for affordable homes in Llandow Ward thus important contribution to that target 100% affordable RSL led scheme with supported DVM .

Not in open countryside as adjacent to recreational area.

Most Appropriate to community it serves.

Attachments: None

4931 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 2782 Pantiles Field, Colwinston/Pantiles Field, Tregolwyn

Respondent: Mrs Karen Jacobs [2746]

Summary:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Full text:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Attachments: None

5473 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 2782 Pantiles Field, Colwinston/Pantiles Field, Tregolwyn

Respondent: Mrs MICHELLE DAVIES [3267]

Summary:

I understand this site is not currently being considered for development, however, I would object should it be subsequently brought forward, on grounds similar to those for site 4069.

Full text:

I understand this site is not currently being considered for development, however, I would object should it be subsequently brought forward, on grounds similar to those for site 4069.

Attachments: None

5979 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 2782 Pantiles Field, Colwinston/Pantiles Field, Tregolwyn

Respondent: Mrs Marion Thomas [3427]

Summary:

I believe the council's assessment of the Pantiles Site is inaccurate or incomplete. The site supports active travel, is not on a flood plain, and is adjacent to existing community facilities. It is identified as Sub 3B land and aligns with policies prioritising site allocation. The site meets the need for affordable homes, is in a sustainable location, and supports climate change mitigation. I urge the inspector to reexamine these decisions to ensure the VOGCC RLDP remains sound.

Full text:

ID 2782
Pantiles Site
The councils assessment undertaken are either inaccurate or dont fully reflect the sites actual characteristics.
Supports active travel 2013 Act and VOGCC policies, Objective 8, 2.12 + 2.13. Route identified and on hold by VOGCC for completion, existing football adjacent to site.
Not on any flood plain or other constraints.
Support retail and shop and cafe to north.
The lowest BMV under ALC Wales predictive maps as Sub 3B land.
VOGCC policies state where candidate sites are put forward and clearly show this, their policies and methodology state these should be allocated first.
LHMA state along with VOGCC data the clear need for affordable homes in the area and Llandow Ward. This site promotes that need.
Not in the open countryside as stated as adjorn, commensurate to the north, public community recreational land to the west, public highways to the east and existing access and utilities and residential settlement in the south.
Supports and mitigates the effects of climate change.
Supports VOGCC policy MD10.
This site represents a sustainable and deliverable opportunity.
We urge the inspector to reexamine these decisions and support otherwise the VOGCC RLDP is unsound.

Attachments:

Representation Form - https://valeofglamorgan.oc2.uk/a/tvk

6305 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 2782 Pantiles Field, Colwinston/Pantiles Field, Tregolwyn

Respondent: Mrs Sian Barwick [3531]

Summary:

Support-2782 pantiles field

Full text:

Support-2782 pantiles field

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3x7

6306 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 2782 Pantiles Field, Colwinston/Pantiles Field, Tregolwyn

Respondent: Mr Ieuan thomas [3532]

Summary:

SUPPORT SECTION 2782 (PANTILES)

Supports Active Travel Wales 2013 Act policies Objective 8 2.12 and 2.13 route identifies on Hold by VoGCC for completion with existing footpath adjacent to site. Supports and mitigate effects of climate change. Supports access to retail as adjoining commercial business ALC Wales states lowest BMV loss of ALL candidate sites and should be priority as policies and methodology state. LH/MA state Clear need for affordable homes in Llandow Ward thus important contribution to that target 100% affordable RSL led scheme with supported DVM . Not in open countryside as adjacent to recreational area. Most Appropriate to community it serves.

Full text:

SUPPORT SECTION 2782 (PANTILES)

Supports Active Travel Wales 2013 Act policies Objective 8 2.12 and 2.13 route identifies on Hold by VoGCC for completion with existing footpath adjacent to site. Supports and mitigate effects of climate change. Supports access to retail as adjoining commercial business ALC Wales states lowest BMV loss of ALL candidate sites and should be priority as policies and methodology state. LH/MA state Clear need for affordable homes in Llandow Ward thus important contribution to that target 100% affordable RSL led scheme with supported DVM . Not in open countryside as adjacent to recreational area. Most Appropriate to community it serves.

SUPPORT SECTION 3834 (OPPOSITE ST DAVIDS CHURCH IN WALES SCHOOL)

Opposite the Village Primary School ,Village Bus Stop , thus Supporting encouraging All Active Travel Wales 2013 Act policies and Objective 8 , 2.12 , 2.13 as existing footpath here. Not on any flood plain unlike allocation HG4 (1) site. Supports and mitigate effects of climate change.
Not on any flood plain . Supports access to retail locally. ALC Wales clearly states low BMV loss. 100% much needed Affordable led scheme by RSL as LH/MA survey state that's required for this Ward. Appropriate to community it serves. Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3x3

6316 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 2782 Pantiles Field, Colwinston/Pantiles Field, Tregolwyn

Respondent: Miss Angharad Thomas [3541]

Summary:

I support the allocation of section 2782 (Pantiles). This location is perfect due to it being next to the main road through the village of colwinston. This location is not in the middle of the countryside and will have great access into the wider village.

Having new development on this land will help grow other facilities such as the local village farm shop and cafe, the public house, the church in wales primary school and other clubs such as youth club and after school clubs for children.

The land is perfect for bringing affordable housing into the area, according to the LH/MA they state that there is a clear need for affordable houses in the area. Having cheaper options in the area will help the younger generation to purchase homes in the village they have grown up in. This contributes to more generations staying in the community and not having to move away to other locations due to housing prices.

This land supports the Active Travel in Wales Act (2013) as there is an active footpath, encourage all ages of people to exercise through walking, going for a run and cycling in the village. This will contribute to overall health and wellness of those living in the area.

Allocation of section 2782 (Pantiles) is land not on a flood plane, this being a ideal location as the affordable homes will not have the risk of flooding during the weather conditions that may present in the future.

Full text:

I support the allocation of section 2782 (Pantiles). This location is perfect due to it being next to the main road through the village of colwinston. This location is not in the middle of the countryside and will have great access into the wider village.

Having new development on this land will help grow other facilities such as the local village farm shop and cafe, the public house, the church in wales primary school and other clubs such as youth club and after school clubs for children.

The land is perfect for bringing affordable housing into the area, according to the LH/MA they state that there is a clear need for affordable houses in the area. Having cheaper options in the area will help the younger generation to purchase homes in the village they have grown up in. This contributes to more generations staying in the community and not having to move away to other locations due to housing prices.

This land supports the Active Travel in Wales Act (2013) as there is an active footpath, encourage all ages of people to exercise through walking, going for a run and cycling in the village. This will contribute to overall health and wellness of those living in the area.

Allocation of section 2782 (Pantiles) is land not on a flood plane, this being a ideal location as the affordable homes will not have the risk of flooding during the weather conditions that may present in the future.

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3jx

4560 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3834 Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston /Tirgyferbyn ag Eglwys Dewi Sant, Tregolwyn Primary School

Respondent: Mr Rob G Thomas [683]

Summary:

Opposite the Village Primary School ,Village Bus Stop , thus Supporting encouraging All Active Travel Wales 2013 Act policies and
Objective 8 , 2.12 , 2.13 as existing footpath here.

Not on any flood plain unlike allocation HG4 (1) site.

Supports and mitigate effects of climate change.

Supports access to retail locally.

ALC Wales clearly states low BMV loss.

100% much needed Affordable led scheme by RSL as LH/MA survey state that's required for this Ward.

Appropriate to community it serves.

Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Full text:

Opposite the Village Primary School ,Village Bus Stop , thus Supporting encouraging All Active Travel Wales 2013 Act policies and
Objective 8 , 2.12 , 2.13 as existing footpath here.

Not on any flood plain unlike allocation HG4 (1) site.

Supports and mitigate effects of climate change.

Supports access to retail locally.

ALC Wales clearly states low BMV loss.

100% much needed Affordable led scheme by RSL as LH/MA survey state that's required for this Ward.

Appropriate to community it serves.

Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Attachments: None

4932 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3834 Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston /Tirgyferbyn ag Eglwys Dewi Sant, Tregolwyn Primary School

Respondent: Mrs Karen Jacobs [2746]

Summary:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Full text:

I agree with the removal of this site from the Candidate List for the RLDP 2021 to 2036. It is good agricultural land, development would be an incursion into the open countryside, and access through the village would be problematic. Colwinston has no key services, facilities, or public transport.

Attachments: None

5471 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3834 Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston /Tirgyferbyn ag Eglwys Dewi Sant, Tregolwyn Primary School

Respondent: Mrs MICHELLE DAVIES [3267]

Summary:

I understand this site is not currently being considered, however, I would object should it be subsequently brought forward, on grounds similar to those for site 4069.

Full text:

I understand this site is not currently being considered, however, I would object should it be subsequently brought forward, on grounds similar to those for site 4069.

Attachments: None

5807 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3834 Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston /Tirgyferbyn ag Eglwys Dewi Sant, Tregolwyn Primary School

Respondent: Emma Hall [3380]

Summary:

I support planning opposite primary school.
Opposite the Village Primary School, Village Bus Stop, thus supporting and encouraging All Active Travel Wales 2013 Act policies and Objective 8, 2.12, 2.13 as existing footpath here.
Not on any flood plain unlike allocation HG4 (1) site.
Supports and mitigate effects of climate change.
Supports access to retail locally.
ALC Wales clearly states low BMV loss.
100% much needed Affordable led scheme by RSL as LHMA survey state that's required for this Ward.
Appropriate to community it serves.
Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Full text:

I support planning opposit primary school.

Opposite the Village Primary School ,Village Bus Stop , thus Supporting encouraging All Active Travel Wales 2013 Act policies and Objective 8 , 2.12 , 2.13 as existing footpath here.

Not on any flood plain unlike allocation HG4 (1) site.

Supports and mitigate effects of climate change.

Supports access to retail locally.

ALC Wales clearly states low BMV loss.

100% much needed Affordable led scheme by RSL as LH/MA survey state that's required for this Ward.

Appropriate to community it serves.

Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t6q

5933 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3834 Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston /Tirgyferbyn ag Eglwys Dewi Sant, Tregolwyn Primary School

Respondent: Mrs Marion Thomas [3427]

Summary:

I support developing the land opposite St. Davids Church in Wales School Colwinston, as it is suitable, non-flood plain, and promotes climate change mitigation. Its proximity to the school, bus stop, and local businesses encourages active travel and community access. Existing football facilities are available, and the site aligns with VOGCC policies, including affordable housing needs in Llandow ward. The site does not intrude on open countryside or recreational land, and constraints assessments appear inaccurate. I urge the inspector to reexamine these assessments for proper consideration.

Full text:

ID 3834
Land opposite St. Davids Church in Wales School Colwinston.
Its opposite the school so positive.
Its opposite the village bus stop so encouraging all Active Travel 2013 Act policies and VOGCC objective 8.
2.12 + 2.13 its existing football here and awaits further VOGCC action
Not on any flood plain or constraints unlike allocated HG4(1) site.
This site promoted and supports and mitigate effects of climate change.
Supports access to local business retail locally all within 300m.
All Wales predictive maps confirm sites 3b and low BMV asri land lower compared to allocate site.
Proposed affordable housing scheme at much needed is the Llandow ward and area as VOGCC policies and consultations state along with LHMA survey.
Site appropriate to community it serves
Not intrusions into open countryside at community recreational land and village public facilities to the north and residential to the south.
Compliance with VOGCC policy MD10
Logical rounding off on village form
The constraints assessment undertaken are either inaccurate or don't fully reflect the sites actual characteristics.
We urge the inspector to reexamine.

Attachments:

Representation Form - https://valeofglamorgan.oc2.uk/a/t9d

6307 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3834 Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston /Tirgyferbyn ag Eglwys Dewi Sant, Tregolwyn Primary School

Respondent: Mrs Sian Barwick [3531]

Summary:

3834 land opposite st David's church of wales school

The Preferred site for Development here in Colwinston. Being Opposite the Village Primary School and Village Bus Stop , thus Supporting All Active Travel in Wales 2013 Act policies and Objective 8 and 2.12 and 2.13 as route identified and on Hold by VoGCC for completion. Not on any flood plain unlike allocation HG4 (1) site that is. Supports and mitigate effects of climate change Supports access to retail and Village Businesses ALC Wales states low BMV loss LH/MA state Clear need for Homes in the next 5 years thus important contribution to that target. Appropriate to community it serves.

Opposite the Village Primary School ,Village Bus Stop , thus Supporting encouraging All Active Travel Wales 2013 Act policies and Objective 8 , 2.12 , 2.13 as existing footpath here. Not on any flood plain unlike allocation HG4 (1) site. Supports and mitigate effects of climate change. Supports access to retail locally. ALC Wales clearly states low BMV loss. 100% much needed Affordable led scheme by RSL as LH/MA survey state that's required for this Ward. Appropriate to community it serves. Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Full text:

3834 land opposite st David's church of wales school

The Preferred site for Development here in Colwinston. Being Opposite the Village Primary School and Village Bus Stop , thus Supporting All Active Travel in Wales 2013 Act policies and Objective 8 and 2.12 and 2.13 as route identified and on Hold by VoGCC for completion. Not on any flood plain unlike allocation HG4 (1) site that is. Supports and mitigate effects of climate change Supports access to retail and Village Businesses ALC Wales states low BMV loss LH/MA state Clear need for Homes in the next 5 years thus important contribution to that target. Appropriate to community it serves.

Opposite the Village Primary School ,Village Bus Stop , thus Supporting encouraging All Active Travel Wales 2013 Act policies and Objective 8 , 2.12 , 2.13 as existing footpath here. Not on any flood plain unlike allocation HG4 (1) site. Supports and mitigate effects of climate change. Supports access to retail locally. ALC Wales clearly states low BMV loss. 100% much needed Affordable led scheme by RSL as LH/MA survey state that's required for this Ward. Appropriate to community it serves. Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3ky

6318 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3834 Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston /Tirgyferbyn ag Eglwys Dewi Sant, Tregolwyn Primary School

Respondent: Miss Angharad Thomas [3541]

Summary:

I support the allocation of 3834 (Land opposite St David's Church In Wales School) as this location is perfect due to it being opposite the village primary school.

This land will ensure those who purchase affordable houses an accessible route to drop their children off at the local school. For older children, this land is directly opposite the comprehensive school bus stop. Children can walk to this bus stop and help cut down emissions by using public transport. This will contribute towards reducing congestion around the comprehensive school but also help the environment - promote lift sharing/using public transport and set standards for children growing up.

The allocation of 3834 supports the Active Travel in Wales Act (2013) as it will encourage those to walk across the road rather than get in a car and drive to take their child to school.

This land is not on a flood plane, meaning this is ideal for those who wish to buy affordable homes in the village. It will reduce any risk of flooding throughout the adverse weather in the united kingdom.

Allocation of 3834 is in the heart of the village and adjacent to the main road, the land is not in the middle of the countryside.

Having this land for affordable housing will keep younger generations in the village, meaning they will not need to purchase homes further away due to the extortionate cost of housing prices. This location will contribute towards the village wider communities such as the farm shop and cafe, after school clubs, the youth club, the public house and bring all those members closer together to make a close knit community.

Full text:

I support the allocation of 3834 (Land opposite St David's Church In Wales School) as this location is perfect due to it being opposite the village primary school.

This land will ensure those who purchase affordable houses an accessible route to drop their children off at the local school. For older children, this land is directly opposite the comprehensive school bus stop. Children can walk to this bus stop and help cut down emissions by using public transport. This will contribute towards reducing congestion around the comprehensive school but also help the environment - promote lift sharing/using public transport and set standards for children growing up.

The allocation of 3834 supports the Active Travel in Wales Act (2013) as it will encourage those to walk across the road rather than get in a car and drive to take their child to school.

This land is not on a flood plane, meaning this is ideal for those who wish to buy affordable homes in the village. It will reduce any risk of flooding throughout the adverse weather in the united kingdom.

Allocation of 3834 is in the heart of the village and adjacent to the main road, the land is not in the middle of the countryside.

Having this land for affordable housing will keep younger generations in the village, meaning they will not need to purchase homes further away due to the extortionate cost of housing prices. This location will contribute towards the village wider communities such as the farm shop and cafe, after school clubs, the youth club, the public house and bring all those members closer together to make a close knit community.

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3jm

7120 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3834 Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston /Tirgyferbyn ag Eglwys Dewi Sant, Tregolwyn Primary School

Respondent: Mr Ieuan thomas [3532]

Summary:

SUPPORT SECTION 3834 (OPPOSITE ST DAVIDS CHURCH IN WALES SCHOOL)

Opposite the Village Primary School ,Village Bus Stop , thus Supporting encouraging All Active Travel Wales 2013 Act policies and Objective 8 , 2.12 , 2.13 as existing footpath here. Not on any flood plain unlike allocation HG4 (1) site. Supports and mitigate effects of climate change.
Not on any flood plain . Supports access to retail locally. ALC Wales clearly states low BMV loss. 100% much needed Affordable led scheme by RSL as LH/MA survey state that's required for this Ward. Appropriate to community it serves. Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Full text:

SUPPORT SECTION 2782 (PANTILES)

Supports Active Travel Wales 2013 Act policies Objective 8 2.12 and 2.13 route identifies on Hold by VoGCC for completion with existing footpath adjacent to site. Supports and mitigate effects of climate change. Supports access to retail as adjoining commercial business ALC Wales states lowest BMV loss of ALL candidate sites and should be priority as policies and methodology state. LH/MA state Clear need for affordable homes in Llandow Ward thus important contribution to that target 100% affordable RSL led scheme with supported DVM . Not in open countryside as adjacent to recreational area. Most Appropriate to community it serves.

SUPPORT SECTION 3834 (OPPOSITE ST DAVIDS CHURCH IN WALES SCHOOL)

Opposite the Village Primary School ,Village Bus Stop , thus Supporting encouraging All Active Travel Wales 2013 Act policies and Objective 8 , 2.12 , 2.13 as existing footpath here. Not on any flood plain unlike allocation HG4 (1) site. Supports and mitigate effects of climate change.
Not on any flood plain . Supports access to retail locally. ALC Wales clearly states low BMV loss. 100% much needed Affordable led scheme by RSL as LH/MA survey state that's required for this Ward. Appropriate to community it serves. Parcel fits in well with residential to the South and Community's facilities and Recreational Green space to the North.

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3x3

4431 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3837 Land at Nant Canna, Treoes /Tir yn Nant Canna, Tre-os

Respondent: Mrs Emily Ham [2769]

Summary:

I don't not agree with any plans or developments for housing in our village. We are a small rural village that doesn't need additional housing. This would cause far more issues with high volume of traffic, already adding to what problems we have with speeding, childrens safety and traffic using the village as a short cut to their journeys.

Full text:

I don't not agree with any plans or developments for housing in our village. We are a small rural village that doesn't need additional housing. This would cause far more issues with high volume of traffic, already adding to what problems we have with speeding, childrens safety and traffic using the village as a short cut to their journeys.

Attachments: None

5581 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3837 Land at Nant Canna, Treoes /Tir yn Nant Canna, Tre-os

Respondent: Mr Ian Richards [3301]

Summary:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Full text:

There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities.
The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
The site is in a Special Landscape Area and therefore the proposed development would be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

Attachments: None

5582 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3837 Land at Nant Canna, Treoes /Tir yn Nant Canna, Tre-os

Respondent: Mr David Hammond [1410]

Summary:

I note that the site is located in rural Vale, seven miles from Cowbridge and eight miles from Bridgend. The site's scale is out of character with the nearby area, and residents would depend on private cars for commuting to work, shops, and primary school in Llangan. The nearest shop is in Pencoed with no public transport, requiring driving to Cowbridge or Bridgend. Access is via narrow, single-lane country roads unsuitable for high traffic volumes or emergency services.

Full text:

The site are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops primary school in Llangan. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services.

Attachments: None

6254 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3837 Land at Nant Canna, Treoes /Tir yn Nant Canna, Tre-os

Respondent: Mrs Juliana Wines [3503]

Summary:

The sites are located in rural Vale, near Cowbridge and Bridgend, with a scale that is out of character for the area. Residents would rely on private cars to access work, shops, and primary schools, as public transport is unavailable to Pencoed's small shop. Access is via narrow country roads unsuitable for high traffic or emergencies. There are concerns about the capacity of the nearby primary school to accommodate a potential population increase.

Full text:

The site are located in the rural Vale, surrounded by open countryside and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops primary school in Llangan. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend. Access to the site is via small single lane country roads that are not suited to high volume traffic or emergency services. Also may need to consider capacity at small primary school to accommodate large increase in population of local area.

Attachments: None

4460 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3855 Land at Ogmore by Sea /Tir yn Aberogwr

Respondent: Mr Owen Bright [2793]

Summary:

Ogmore by sea is already overdeveloped. The main road is often impassable since the inappropriate village hall development. There is no infrastructure to accommodate further homes.

Full text:

Ogmore by sea is already overdeveloped. The main road is often impassable since the inappropriate village hall development. There is no infrastructure to accommodate further homes.

Attachments: None

7169 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3855 Land at Ogmore by Sea /Tir yn Aberogwr

Respondent: Wig Fach Property Company Ltd [2373]

Agent: Geraint John Planning Ltd

Summary:

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan.
The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound".
Notwithstanding any potential allocation at Wick or Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.
It cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect.
It is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The site is within a maximum of a 22-minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.
The development will be built to high sustainable standards, and therefore, the scoring of the site in regard to climate change should be amended as a result.
To conclude, the settlement, location and site are inherently suitable and deliverable and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Full text:

ANNEX 1
Preface

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

The representations are structured into the following sections:

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

SECTION 1. Response to the Deposit Plan

Distribution of Growth

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

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

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

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

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

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

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

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

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

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

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

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

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

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

Housing Supply

RLDP Allocations - Key Sites

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

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

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

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

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

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

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

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set

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

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

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

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

Windfall Sites

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

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

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

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

St Athan Train Station

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

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

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

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

questions regarding the suitability and acceptability of the proposed allocations set out above.

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

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

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

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

Rolled forward LDP Sites

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

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

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

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

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

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

Housing Delivery Rate Assumptions

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

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

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

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

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

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

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

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

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

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

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

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

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

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

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

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

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

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

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

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

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy."
It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

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

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

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

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

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

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental

benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

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

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image

below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

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

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

Preface

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

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

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

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

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

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

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

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

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

Timing Assumptions underpinning the Trajectory

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

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

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

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major

applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

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

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

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

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

Housing Delivery Rate Assumptions

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

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

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

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

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document "New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the

number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

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

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

Status & Standing of Sites included in the Trajectory

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

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

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

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

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

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

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

Key Sites

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

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

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

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

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

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

St Athan Train Station

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

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements

across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

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

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

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

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

“A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth.”

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the ‘Rectory Field, St Brides Road’ site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

‘Land West of Maendy Road’ has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the ‘Candidate Assessment at Preferred Strategy Stage’ (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the “soundness” of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in ‘Sustainable Transport – Public Transport’, this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states “New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes”. Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states “new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.”

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport

infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

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

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

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

4732 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3856 Three Golden Cups Campsite /Maes Gwersylla Three Golden Cups

Respondent: Mr Paul Hartmann [2848]

Summary:

This land is unsuitable for housing, as it is on a water course, it is in a prime area of outstanding natural beauty, and the Heritage Coastline , and Heritage Coastal Path. A very popular family holiday destination and campsite, many individuals and families come from near and far to holiday here, and enjoy the walks and the beaches.
There is a development opposite in the old Blind Home which is more appropriate.
This land is not infill land , it is an area of natural beauty which should be preserved for future generations to enjoy.

Full text:

This land is unsuitable for housing, as it is on a water course, it is in a prime area of outstanding natural beauty, and the Heritage Coastline , and Heritage Coastal Path. A very popular family holiday destination and campsite, many individuals and families come from near and far to holiday here, and enjoy the walks and the beaches.
There is a development opposite in the old Blind Home which is more appropriate.
This land is not infill land , it is an area of natural beauty which should be preserved for future generations to enjoy.

Attachments: None

5300 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 3856 Three Golden Cups Campsite /Maes Gwersylla Three Golden Cups

Respondent: Ms Kim Fitzpatrick [2849]

Summary:

This site is in an area of outstanding natural beauty on the Heritage Jurassic Coast Path. The existing campsite attracts hundreds of tourists to the area every year, providing a wonderful place to holiday and explore the area. We already have the Blind Home redevelopment in place and more housing will turn Southerndown into a much larger village losing its appeal as a tourist attraction. We need to hang onto a unspoilt places of calm and tranquility along our coastline for people's enjoyment. I believe this site is on an underground watercourse and has caused flooding to the pub adjacent.

Full text:

This site is in an area of outstanding natural beauty on the Heritage Jurassic Coast Path. The existing campsite attracts hundreds of tourists to the area every year, providing a wonderful place to holiday and explore the area. We already have the Blind Home redevelopment in place and more housing will turn Southerndown into a much larger village losing its appeal as a tourist attraction. We need to hang onto a unspoilt places of calm and tranquility along our coastline for people's enjoyment. I believe this site is on an underground watercourse and has caused flooding to the pub adjacent.

Attachments: None

4436 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4057 Land east of Llangan /Tir i'r dwyrain o Lan-gan

Respondent: Mr Ian Husband [2776]

Summary:

Green belt land close to a conservation area that would completely change the nature of old Llangan and intrude on current residents, very poor choice of land

Full text:

Green belt land close to a conservation area that would completely change the nature of old Llangan and intrude on current residents, very poor choice of land

Attachments: None

4439 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4057 Land east of Llangan /Tir i'r dwyrain o Lan-gan

Respondent: Mrs Candice Williams [1333]

Summary:

Flood risk to lower houses would increase (already high risk)

Increased traffic down a single track lane which is already dangerous for pedestrians, walkers, cyclists and riders.

Weight limit on bridge on access road.

No critical infrastructure, public transport and services

Full text:

Flood risk to lower houses would increase (already high risk)

Increased traffic down a single track lane which is already dangerous for pedestrians, walkers, cyclists and riders. I had a close miss today with people driving so fast whilst riding on this lane.

Weight limit on bridge on access road.

No critical infrastructure, public transport and services

Attachments: None

5783 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4057 Land east of Llangan /Tir i'r dwyrain o Lan-gan

Respondent: Ms Enid Owen [3365]

Summary:

I object to any development on land east of Llangan, which at present is used as pasture for cows and sheep. I believe it remains largely unimproved because it has no artificial fertilisers added to it. This makes it a valuable meadow supporting native flora, which are increasingly rare in Wales. The new Environment Bill emphasises protecting the natural environment, and preventing development on this land would help reverse biodiversity decline and promote native species. I believe conserving this meadow aligns with national environmental priorities and biodiversity targets.

Full text:

I am making this comment about the land east of Llangan. I would like to object to any development on this field which is occasionally used as pasture for cows and sheep. To the best of my knowledge no artificial fertiliser is spread on this land. This makes it particularly valuable as a meadow in which native flora can flourish. Such 'unimproved' meadows are quite rare in Wales and every effort should be made to conserve them. A new Environment [Principles, Governance and Biodiversity Targets, Wales] Bill was passed in the Senedd last February [2026]which established a new framework for environmental protection. To quote Huw Irranca-Davies the Deputy First Minister with responsibility for Climate change the passing of this Bill 'has sent a clear message that protecting our natural environment is a national priority'. Not allowing development on the above land will help reverse biodiversity decline and allow the variety of native species to increase.

Attachments: None

6252 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4057 Land east of Llangan /Tir i'r dwyrain o Lan-gan

Respondent: Mrs Juliana Wines [3503]

Summary:

The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area and close by hamlet of Fferm Goch. Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Full text:

The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area and close by hamlet of Fferm Goch. Anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

6327 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4057 Land east of Llangan /Tir i'r dwyrain o Lan-gan

Respondent: Mr Richard Brian Antuch [3065]

Summary:

I believe the Site conflicts with the RLDP's strategy by being poorly related to existing settlement patterns, risking fragmented growth, and undermining sustainable development principles. It is in an unsustainable location with limited access to services and public transport, increasing reliance on private vehicles. The Site threatens landscape and settlement character, especially within valued countryside areas. Concerns include poor placemaking, infrastructure capacity issues, lack of justification for its need, and cumulative impacts with nearby sites. Therefore, I conclude the Site should be removed from the RLDP or the plan deemed unsound.

Full text:

1. Conflict with the RLDP Spatial Strategy
1.1 The RLDP's spatial strategy seeks to direct housing growth to sustainable locations, prioritising:
1.1.1 Well-connected settlements;
1.1.2 Locations with good access to services, facilities and employment; and
1.1.3 Development that reinforces, rather than undermines, settlement form.
1.2 The Site:
1.2.1 Is poorly related to the existing settlement patterns;

1.2.2 Represents an outward expansion that risks fragmented or dispersed growth; and
1.2.3 Does not clearly demonstrate how development would integrate with the existing built form in a manner consistent with the Plan's strategy.
1.3 The location of the site therefore undermines the RLDP's stated approach to sustainable growth and settlement hierarchy.

2. Unsustainable location and transport accessibility
2.1 Planning Policy Wales requires development to minimise the need to travel and to prioritise active travel and sustainable transport.
2.2 In respect of the Site:
2.2.1 There is insufficient evidence that the site is located within convenient walking distance of everyday services and facilities;
2.2.2 Public transport is essentially non-existent; and
2.2.3 Development would be likely to result in increased reliance on private car travel, contrary to the national policy and the VOG's climate objectives.
2.3 The RLDP evidence base does not robustly demonstrate that these sites can support genuine modal shift or deliver sustainable travel patterns.

3. Landscape, countryside and settlement character
3.1 The VOG is characterised by a sensitive and distinctive landscape, with clear settlement edges and areas of open countryside, contributing to local character.
3.2 The allocation of the Site would:
3.2.1 Result in the loss of undeveloped land that performs an important landscape and/ or settlement function;
3.2.2 Risk erosion of settlement identity through incremental outward expansion; and
3.2.3 Cause harm to the visual and rural setting of affected communities.
3.3 Where sites lie within or adjacent to Special Landscape Areas of valued countryside, national and local policy requires strong justification. That justification has not been demonstrated.

4. Failure to deliver high-quality placemaking
4.1 Placemaking is identified in the RLDP as a central objective. However, the Site raises significant concerns in this regard:
4.1.1 The location and constraints risk development that is peripheral, car-dominated and poorly integrated;
4.1.2 Opportunities to create walkable neighbourhoods with a strong sense of place appear limited; and
4.1.3 There is a real risk that development would result in standardised estate layouts, rather than distinctive, locally responsive places.
4.2 The evidence does not show that development on these sites could achieve the quality of placemaking required by the national policy and RLDP.

5. Infrastructure capacity and deliverability
5.1 For the Site to be soundly allocated, the VOG must demonstrate that they it is deliverable within the plan period and supported by appropriate infrastructure.
5.2 In relation to the Site:
5.2.1 There is insufficient clarity regarding highway capacity, safe access and mitigation;
5.2.2 Local services and facilities are already under pressure, with no firm delivery strategy identified;
5.2.3 The infrastructure implication of allocating multiple sites in proximity have not been adequately addressed (as there are other candidate sites close by, namely 398, 401, 402, 468, 2671 & 4068).
5.3 As such, the effectiveness and deliverability of the allocation is not demonstrated.

6. Failure to justify the need for the Site
6.1 The RLDP must show that the Site allocation is necessary, having regard to reasonable alternatives.
6.2 The evidence does not demonstrate that:
6.2.1 More suitable or less sensitive sites have been exhausted;
6.2.2 Previous development land opportunities have been prioritised to the extent required by national policy; or
6.2.3 The Site is required to meet identified housing need.
6.3 Without such justification, the allocation of the Site fails the tests of soundness.

7. Cumulative impact
7.1 When considered collectively with other candidate sites in close proximity to the Site (namely candidate sites 398, 401, 402, 468, 2671 & 4068), allocation of the Site would result in:
7.1.1 Excessive growth pressure on certain settlements;
7.1.2 Incremental erosion of countryside and landscape character; and
7.1.3 Development that is inconsistent with a plan-led, sustainable strategy.
7.2 The cumulative impacts have not been adequately assessed or addressed.

8. Conclusion
8.1 For the reasons set out above, the Site is:
8.1.1 Unsustainably located;
8.1.2 Likely to cause unacceptable harm to landscape and settlement character;

8.1.3 Inadequately supported by infrastructure and deliverability evidence; and
8.1.4 Not justified by housing need or the consideration of alternatives.
8.2 The Site should therefore be removed from the RLDP, or the Plan found unsound insofar as it relies upon its allocation.

Attachments:
Representation Form - https://valeofglamorgan.oc2.uk/a/thg

4729 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4059 Land West of St Brides Road /Tir i'r gorllewin o St Brides Road

Respondent: Mr Julian Bowles [2902]

Summary:

I object due to concerns over environmental impacts, including increased flood risk from building on grassland that currently provides natural drainage, and inadequate wastewater treatment capacity for the proposed housing expansion. Further considerations are the detrimental effects of noise and light pollution, as well as reduced natural light for existing properties caused by the proximity and elevation of new builds. Additionally, there is no existing vehicular access to the sites, and increased traffic from the development would raise road congestion, noise, and vehicle emissions in the village.

Full text:

Objection is based on a number of concerns.
Environmental impacts - Increased flood risk from building on grassland which currently provides natural drainage and run off for rainwater. Current wastewater treatment facility is not scaled to cope with an expansion of housing on the proposed scale.
There is a detrimental impact of noise and light pollution arising from close proximity to existing properties, along with a reduction in natural light levels to existing properties resulting from elevation and proximity of proposed new builds.
Road infrastructure & access - there is no existing vehicular access to the proposed sites and the increase in potential traffic due to the rural location would inevitably lead to higher traffic volumes in the village and additional road noise and vehicle emissions.

Attachments: None

5010 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4059 Land West of St Brides Road /Tir i'r gorllewin o St Brides Road

Respondent: Mr Robert Davies [3074]

Summary:

The site conflicts with national planning policy and the RLDP's spatial strategy, promoting unsustainable and disproportionate growth that would harm Wick's rural character and setting. Development should prioritise brownfield or well-located sites near existing urban areas with suitable infrastructure. This proposal would damage Green Wedges and Green Infrastructure and represents unnecessary countryside development. It extends the settlement into open countryside, eroding its form and rural approach. Wick lacks the services, transport and infrastructure to support such growth, and local roads are constrained. The site would also create significant landscape and visual harm. It therefore fails key RLDP soundness tests.

Full text:

The site conflicts with national planning policy and the RLDP's spatial strategy, promoting unsustainable and disproportionate growth that would harm Wick's rural character and setting. Development should prioritise brownfield or well-located sites near existing urban areas with suitable infrastructure. This proposal would damage Green Wedges and Green Infrastructure and represents unnecessary countryside development. It extends the settlement into open countryside, eroding its form and rural approach. Wick lacks the services, transport and infrastructure to support such growth, and local roads are constrained. The site would also create significant landscape and visual harm. It therefore fails key RLDP soundness tests.

Attachments: None

5170 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4059 Land West of St Brides Road /Tir i'r gorllewin o St Brides Road

Respondent: Miss Lynn Goward [820]

Summary:

The proposed inclusion of land in Wick for development is not sufficiently justified by local evidence. While the VOG has a recognised need for additional housing, no Wick specific housing needs assessment has been presented to demonstrate that development of this scale is proportionate to the villages size, character and infrastructure capacity. Affordable housing need does not automatically justify this oversized development of Wick. Wicks status as a minor rural settlement, countryside protection and creeping village expansion have to be considered. It should be more suited to towns and strategic growth areas. Existing drainage and sewage infrastructure is limited.

Full text:

The proposed inclusion of land in Wick for development is not sufficiently justified by local evidence. While the VOG has a recognised need for additional housing, no Wick specific housing needs assessment has been presented to demonstrate that development of this scale is proportionate to the villages size, character and infrastructure capacity. Affordable housing need does not automatically justify this oversized development of Wick. Wicks status as a minor rural settlement, countryside protection and creeping village expansion have to be considered. It should be more suited to towns and strategic growth areas. Existing drainage and sewage infrastructure is limited.

Attachments: None

5375 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4059 Land West of St Brides Road /Tir i'r gorllewin o St Brides Road

Respondent: Mr Gareth Thomas [2975]

Summary:

I object to the potential development of Site ID 4059 Wick, within the RDLP process. While the Council has not taken this site forward for allocation in the Deposit Plan, I wish to record my objection should it be reconsidered at any later stage. Wick is a small rural settlement that has already experienced significant recent housing growth without corresponding expansion in services or infrastructure. Additional development on further greenfield sites would risk disproportionate expansion of the village and incremental erosion of its rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy.

Full text:

I formally object to the potential development of Site ID 4059 Wick, identified during the RLDP candidate site process. Although this site has not been taken forward for allocation in the Deposit Plan, I wish to register this objection for the record should the site be reconsidered at any stage during the examination or future revisions to the Plan. For avoidance of doubt, I have recorded this as a 'Comment' rather than an 'Objection', as I do not object to the current decision not to take this site forward for further consideration.

Wick is a small rural settlement that has already experienced notable housing growth in recent years. While the provision of housing is recognised as important, development within smaller settlements must remain proportionate to the scale, function, and infrastructure capacity of the community. Wick has a limited service base and relies heavily on nearby towns for employment, healthcare, secondary education and many everyday services. Continued housing growth in such circumstances risks reinforcing unsustainable travel patterns and increasing reliance on private car journeys.

In this context, further development on additional greenfield sites around the village would represent incremental outward expansion of the settlement. Such expansion has the potential to erode the rural character of Wick and alter its historic form and relationship with the surrounding countryside. Development pressures on multiple edge-of-settlement sites, outside of the strategic growth area, would cumulatively change the scale and character of the village in a way that is disproportionate to its role within the settlement hierarchy.

Evidence prepared for the RLDP has already identified a range of sustainability and infrastructure considerations affecting development within the village. Where candidate sites have been assessed in detail, a number of environmental and infrastructure constraints have been identified. It is therefore reasonable to expect that similar issues would arise for other sites around the settlement unless robust evidence demonstrates otherwise.

For these reasons, further expansion of Wick through development on additional candidate sites would not represent proportionate or sustainable growth. Any reconsideration of Site ID 4059 should therefore be resisted unless clear and robust evidence demonstrates that development would be consistent with the Plan's spatial strategy, infrastructure capacity, and national sustainability objectives.

Attachments: None

5390 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4059 Land West of St Brides Road /Tir i'r gorllewin o St Brides Road

Respondent: Mrs Clair Thomas [3069]

Summary:

I object to the potential development of Site ID 4059 Wick, within the RDLP process. While the Council has not taken this site forward for allocation in the Deposit Plan, I wish to record my objection should it be reconsidered at any later stage. Wick is a small rural settlement that has already experienced significant recent housing growth without corresponding expansion in services or infrastructure. Additional development on further greenfield sites would risk disproportionate expansion of the village and incremental erosion of its rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy.

Full text:

I formally object to the potential development of Site ID 4059 Wick, identified during the RLDP candidate site process. Although this site has not been taken forward for allocation in the Deposit Plan, I wish to register this objection for the record should the site be reconsidered at any stage during the examination or future revisions to the Plan. For avoidance of doubt, I have recorded this as a 'Comment' rather than an 'Objection', as I do not object to the current decision not to take this site forward for further consideration.

Wick is a small rural settlement that has already experienced notable housing growth in recent years. While the provision of housing is recognised as important, development within smaller settlements must remain proportionate to the scale, function, and infrastructure capacity of the community. Wick has a limited service base and relies heavily on nearby towns for employment, healthcare, secondary education and many everyday services. Continued housing growth in such circumstances risks reinforcing unsustainable travel patterns and increasing reliance on private car journeys.

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Evidence prepared for the RLDP has already identified a range of sustainability and infrastructure considerations affecting development within the village. Where candidate sites have been assessed in detail, a number of environmental and infrastructure constraints have been identified. It is therefore reasonable to expect that similar issues would arise for other sites around the settlement unless robust evidence demonstrates otherwise.

For these reasons, further expansion of Wick through development on additional candidate sites would not represent proportionate or sustainable growth. Any reconsideration of Site ID 4059 should therefore be resisted unless clear and robust evidence demonstrates that development would be consistent with the Plan's spatial strategy, infrastructure capacity, and national sustainability objectives.

Attachments: None

7048 Support

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4060 Land at Ystradowen /Tir yn Ystradowen

Respondent: Marion morgan [2413]

Agent: Geraint John Planning Ltd

Summary:

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan.
The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect.
Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;
Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy "a need for 230 additional affordable units over the next 15 years" within "the ward of Cowbridge"; and 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated.
Notwithstanding any potential allocation at Wick or Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound".

It is considered that this site represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car.
Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.
To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Full text:

ANNEX 1
Preface

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

The representations are structured into the following sections:

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

SECTION 1. Response to the Deposit Plan

Distribution of Growth

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

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

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

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

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the

Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

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

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

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

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

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

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

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

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

Housing Supply

RLDP Allocations - Key Sites

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

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

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

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

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

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

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

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

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

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

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

Windfall Sites

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

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

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

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

St Athan Train Station

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

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

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

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

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

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

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

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not

considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

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

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

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

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

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

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

Housing Delivery Rate Assumptions

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

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

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

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

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an

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

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

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

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

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

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

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

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

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

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

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

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

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

Securing further delivery of Affordable Units

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

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

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

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

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

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

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

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

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

Para 6.140 are outlined below in red:

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

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

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

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

Deliverability of the Site

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

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

In summary, the site promoters:

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

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

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

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

Land at Ystradowen (Site ID: 4060)

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

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

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

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

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

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

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

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the

'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as

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

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

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

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

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

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

The second section/paragraph of the assessment states:

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

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

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

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."

A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

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

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

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

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

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

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

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

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

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

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

Summary and Conclusion

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

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

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

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

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

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

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

Summary of These Representations

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

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

Preface

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

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

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

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

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

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been

consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

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

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

Timing Assumptions underpinning the Trajectory

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

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

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

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

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

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

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

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

Housing Delivery Rate Assumptions

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

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

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

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

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

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

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

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

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

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

Status & Standing of Sites included in the Trajectory

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

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

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

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

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

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

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

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

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

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

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units

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

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

St Athan Train Station

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

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

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

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

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

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

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

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

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

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

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

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

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

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. 'Land West of Maendy Road, Aberthin' causing "unacceptable harm to the important landscape of the area" will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear

possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a “small scale affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” is not provided for. This is clearly an issue. Given however ‘Land at Ystradowen’ does not sit within a SLA – and so not pose any potential concern or cause any “unacceptable harm to the important landscape of the area” – the allocation of this site would be more suitable and “safer” - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”, are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in ‘Sustainable Transport – Public Transport’, this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states “New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes”. Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states “new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.”

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need “To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy”. To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to “Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure”. In addition, Promoting Active and Sustainable Travel Choices outlines to “Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel”.

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”. There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A “small scale affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” will therefore not be provided for. This is clearly an issue.

When comparing this with ‘Land at Ystradowen’, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

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

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

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

6253 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4068 Land adjacent to Llangan Primary School /Tir ger Ysgol Gynradd Llan-gan

Respondent: Mrs Juliana Wines [3503]

Summary:

I believe the site is too close to Llangan School, restricting its expansion of play areas or parking and limiting capacity for additional children. Located in the rural Vale, 7 miles from Cowbridge and 8 miles from Bridgend, its scale is out of character with the area. Residents would likely rely on private cars for transport, as public transport is unavailable, especially to local shops in Pencoed. Access to larger supermarkets requires driving to Cowbridge or Bridgend.

Full text:

The site is too close to Llangan School and would prohibit the school from expanding its play area or car park. The school has limited capacity for additional children. The site is located in the rural Vale and 7 miles from Cowbridge and 8 miles from Bridgend. The scale of the site is completely out of character with the local area. Realistically, anyone living in this location will rely on private cars to get to and from the site for work, shops and everything except the primary school. The nearest small shop is in Pencoed to which there is no public transport. Otherwise it is necessary to drive to Cowbridge or Bridgend or one of the large supermarkets on the edge of Bridgend.

Attachments: None

6334 Object

Document Element: RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY) / FRO WLEDIG (Y BONT-FAEN, SAINT-Y-BRID, LLANDW AC EWENNI), 4068 Land adjacent to Llangan Primary School /Tir ger Ysgol Gynradd Llan-gan

Respondent: Mr Richard Brian Antuch [3065]

Summary:
I find that the site conflicts with the RLDP's strategic focus on sustainable, well-connected settlements and risks fragmented growth due to its poor relation to existing settlement patterns. Its location is unsustainable, lacking nearby services and transport options, which would increase car reliance. The site threatens local landscape and settlement character, with insufficient justification for its development and concerns about placemaking quality. Infrastructure capacity is unclear, and there is no evidence of need or consideration of alternatives. Cumulative impacts with nearby sites could undermine the plan's sustainability. Therefore, the site should be removed or the plan considered unsound.

Full text:
1. Conflict with the RLDP Spatial Strategy
1.1 The RLDP's spatial strategy seeks to direct housing growth to sustainable locations, prioritising:
1.1.1 Well-connected settlements;
1.1.2 Locations with good access to services, facilities and employment; and
1.1.3 Development that reinforces, rather than undermines, settlement form.
1.2 The Site:
1.2.1 Is poorly related to the existing settlement patterns;
1.2.2 Represents an outward expansion that risks fragmented or dispersed growth; and
1.2.3 Does not clearly demonstrate how development would integrate with the existing built form in a manner consistent with the Plan's strategy.
1.3 The location of the site therefore undermines the RLDP's stated approach to sustainable growth and settlement hierarchy.

2. Unsustainable location and transport accessibility
2.1 Planning Policy Wales requires development to minimise the need to travel and to prioritise active travel and sustainable transport.
2.2 In respect of the Site:
2.2.1 There is insufficient evidence that the site is located within convenient walking distance of everyday services and facilities;
2.2.2 Public transport is essentially non-existent; and
2.2.3 Development would be likely to result in increased reliance on private car travel, contrary to the national policy and the VOG's climate objectives.
2.3 The RLDP evidence base does not robustly demonstrate that these sites can support genuine modal shift or deliver sustainable travel patterns.

3. Landscape, countryside and settlement character
3.1 The VOG is characterised by a sensitive and distinctive landscape, with clear settlement edges and areas of open countryside, contributing to local character.
3.2 The allocation of the Site would:
3.2.1 Result in the loss of undeveloped land that performs an important landscape and/ or settlement function;
3.2.2 Risk erosion of settlement identity through incremental outward expansion; and
3.2.3 Cause harm to the visual and rural setting of affected communities.
3.3 Where sites lie within or adjacent to Special Landscape Areas of valued countryside, national and local policy requires strong justification. That justification has not been demonstrated.

4. Failure to deliver high-quality placemaking
4.1 Placemaking is identified in the RLDP as a central objective. However, the Site raises significant concerns in this regard:
4.1.1 The location and constraints risk development that is peripheral, car-dominated and poorly integrated;
4.1.2 Opportunities to create walkable neighbourhoods with a strong sense of place appear limited; and
4.1.3 There is a real risk that development would result in standardised estate layouts, rather than distinctive, locally responsive places.
4.2 The evidence does not show that development on these sites could achieve the quality of placemaking required by the national policy and RLDP.

5. Infrastructure capacity and deliverability
5.1 For the Site to be soundly allocated, the VOG must demonstrate that they it is deliverable within the plan period and supported by appropriate infrastructure.
5.2 In relation to the Site:
5.2.1 There is insufficient clarity regarding highway capacity, safe access and mitigation;
5.2.2 Local services and facilities are already under pressure, with no firm delivery strategy identified;
5.2.3 The infrastructure implication of allocating multiple sites in proximity have not been adequately addressed (as there are other candidate sites close by, namely 398, 401, 403, 2671 & 4057).
5.3 As such, the effectiveness and deliverability of the allocation is not demonstrated.

6. Failure to justify the need for the Site
6.1 The RLDP must show that the Site allocation is necessary, having regard to reasonable alternatives.
6.2 The evidence does not demonstrate that:
6.2.1 More suitable or less sensitive sites have been exhausted;
6.2.2 Previous development land opportunities have been prioritised to the extent required by national policy; or

6.2.3 The Site is required to meet identified housing need.
6.3 Without such justification, the allocation of the Site fails the tests of soundness.

7. Cumulative impact
7.1 When considered collectively with other candidate sites in close proximity to the Site (namely candidate sites 398, 401, 403, 2671 & 4057), allocation of the Site would result in:
7.1.1 Excessive growth pressure on certain settlements;
7.1.2 Incremental erosion of countryside and landscape character; and
7.1.3 Development that is inconsistent with a plan-led, sustainable strategy.
7.2 The cumulative impacts have not been adequately assessed or addressed.

8. Conclusion
8.1 For the reasons set out above, the Site is:
8.1.1 Unsustainably located;
8.1.2 Likely to cause unacceptable harm to landscape and settlement character;
8.1.3 Inadequately supported by infrastructure and deliverability evidence; and
8.1.4 Not justified by housing need or the consideration of alternatives.
8.2 The Site should therefore be removed from the RLDP, or the Plan found unsound insofar as it relies upon its allocation.

Attachments:
Representation Form - https://valeofglamorgan.oc2.uk/a/thk