VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

Volume 2 – Full Representations on Introduction, Policy Context, Key Characteristics, Themes, Vision and Objectives and Sustainable Growth Strategy

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 It also excludes representations that have been withdrawn.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.

POLICY CONTEXT

5112 Support

Document Element: National Policy and Legislation

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

Summary:

After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter).

Annex 1 – General Conformity with Future Wales
• No significant concerns

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).

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

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

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

The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro

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

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in

unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

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

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

and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level

of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this

supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).

Delivery and Implementation

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

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

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

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

It will be for the Council to justify deliverability supported by robust financial viability.

Gypsy and Travellers

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

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

Renewable Energy

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

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

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

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

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

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

Minerals

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

the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

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

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

Change suggested by respondent:

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Sound: Not specified

Attachments:

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

6587 Object

Document Element: National Policy and Legislation

Respondent: Councillor Stephen Haines [1029]

Summary:

St. Athan has a role within the wider Cardiff Capital Region and the South East National Growth Area. However, the current scale of housing allocation is not sufficiently matched by guaranteed infrastructure, retail provision, or community space protection.
Without modification, the Plan risks:- Car-dependent growth,- Loss of valued open space,- Insufficient local retail provision,- Pressure on community infrastructure.
This representation therefore seeks amendments to ensure that growth in St. Athan and Flemingston is proportionate, infrastructure-led, environmentally responsible, and compliant with Welsh planning policy

Full text:

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

2. Summary of Representation
This representation raises concerns regarding:
1. The scale of housing growth in St. Athan.
2. The absence of guaranteed sustainable transport infrastructure.
3. Insufficient retail and community infrastructure provision, particularly within the ward of Flemingston.
4. The allocation of the Clive Road site (HG1(8)), which currently functions as a de facto village green.
5. The cumulative infrastructure impact of candidate and legacy site allocations.
The representation seeks modifications to ensure the Plan is infrastructure-led, deliverable, and compliant with national planning policy and the Well-being of Future Generations (Wales) Act 2015.

3. Scale of Housing Growth in St. Athan
The RLDP allocates:
- KS4 - 532 dwellings
- KS5 - 600 dwellings
- HG1(7) - 80 dwellings
- HG1(8) - 51 dwellings
This equates to 1,263 dwellings in St. Athan.
This represents a very significant expansion of the settlement and must be assessed against:
- Existing infrastructure capacity
- Transport provision
- Education and healthcare availability
- Retail and service provision
At present, St. Athan does not have a rail station and relies heavily on private car travel.
The Plan must demonstrate clearly that this level of growth is proportionate and deliverable.

4. Transport Infrastructure and Deliverability
The RLDP safeguards land for a "transport interchange" at St. Athan. However:
- There is no confirmed rail station.
- There is no confirmed funding package.
- There is no defined delivery programme.
- There are no binding occupation triggers linking housing delivery to transport delivery.

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

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

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

5. Retail and Local Service Provision - Flemingston Ward

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.
Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:

- No corresponding neighbourhood retail allocation.

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

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

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

Without provision of much-needed retail units within Flemingston ward, residents will remain dependent on car travel for everyday needs.
Modification is therefore sought to require neighbourhood retail and service provision proportionate to housing growth.

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

The Clive Road site (HG1(8), 51 dwellings) currently functions as a de facto village green.
Although not formally designated, it is:
- Used informally for recreation.
- A visual open space within the settlement.
- A valued community amenity.
Its allocation for housing would result in:
- Loss of accessible informal open space.
- Erosion of community character.
- Reduction in green infrastructure connectivity.
The Plan should:
- Reassess the allocation in light of its community use; or
- Require equivalent or superior replacement open space within immediate proximity prior to development.
This matter engages Policy on Open Space and Green Infrastructure and must be considered in accordance with the prevention and long-term principles of the Well- being Act.

7. Candidate and Legacy Sites - Cumulative Impact Several allocations in St. Athan arise from:
- The Candidate Site process.
- Rolled-forward legacy allocations.
Individually, smaller sites may appear acceptable. However, cumulatively they produce substantial growth in a settlement with constrained infrastructure.
The Plan must demonstrate:
- Why these sites were preferred over alternatives.
- That lower growth options were robustly assessed.
- That greenfield loss is justified and mitigated.

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

There is insufficient clarity regarding:
- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

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

9. Compliance with the Five Ways of Working

Long-Term: Irreversible greenfield expansion without secured sustainable transport risks embedding long-term car dependency.
Prevention: Without infrastructure-first sequencing, congestion and service strain are foreseeable.
Integration: Housing growth appears to run ahead of confirmed transport and retail provision.
Collaboration: The Plan should demonstrate binding commitments from transport and infrastructure partners.
Involvement: Community concerns regarding scale and open space loss must be properly addressed.

10. Modifications Sought

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

1. Phasing Policy for KS4 and KS5
Introduce clear occupation thresholds tied to delivery of:
- Transport interchange infrastructure.

- Highway mitigation.Education capacity.
- Healthcare provision.

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

3. Clive Road Site Review (HG1(8))
Either:
- Remove the allocation; or
- Require replacement open space of equal or greater quality delivered prior to development.

4. Strengthened Infrastructure-First Wording
Amend Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.

5. Monitoring Framework Enhancement Include specific indicators for:
- Sustainable transport modal share.
- Retail provision delivery.
- Open space replacement.
- Infrastructure phasing compliance.

11. Conclusion

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

Without modification, the Plan risks:
- Car-dependent growth,
- Loss of valued open space,
- Insufficient local retail provision,
- Pressure on community infrastructure.

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

Change suggested by respondent:

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

Sound: Not specified

Attachments:

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

6644 Object

Document Element: National Policy and Legislation

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

Summary:

As a minor point, please note that the South Central Area Statement is not hyphenated
(para 2.10 and 2.11).

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a ‘nature emergency’ and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan’s policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation

properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.

General Approach to Designated Sites

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

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

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

We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.

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

Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.

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

Master Planning

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

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

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

Strategic Opportunity at Bro Tathan

In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.

This will ensure that development in the area:

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

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

Areas of High Ecological Value

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

2. Integrated Sustainability Assessment (ISA)

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

mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within

the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

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

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

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

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

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

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

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

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

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.

HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development

would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

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

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

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational Pressure’ within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.

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

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

7056 Object

Document Element: National Policy and Legislation

Respondent: Barratt Redrow Homes [2669]

Agent: Highlight Planning

Summary:

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining. Based on the current timetable, an end date of 2038 (with associate increase in housing requirement) would therefore ensure a sound plan.

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.

Change suggested by respondent:

-

Sound: Not specified

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

7124 Support

Document Element: National Policy and Legislation
Respondent: Seth Hill & Son Ltd [1197]
Agent: Highlight Planning

Summary:

The broad alignment of the Deposit RLDP with national minerals policy is supported.

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.

Change suggested by respondent:

-

Sound: Not specified

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

7133 Object

Document Element: National Policy and Legislation
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:

Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.

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.

Change suggested by respondent:

Amend plan period.

Sound: Not specified

Attachments:

Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

4655 Object

Document Element: Regional Context

Respondent: Mr Tim Griffiths [2578]

Summary:

I find that councils joining together in large projects where large amounts of taxpayers money is put into projects and not doing due diligence on possible pitfalls leaving them open to large financial penalties. Leaving local taxpayers to pick up the fallout from lack of business acumen

Full text:

I find that councils joining together in large projects where large amounts of taxpayers money is put into projects and not doing due diligence on possible pitfalls leaving them open to large financial penalties. Leaving local taxpayers to pick up the fallout from lack of business acumen

Change suggested by respondent:

Larger project investments need to be overseen by Welsh Assembly as some pitfalls can leave councils to be financially exposed

Sound: No

Attachments: None

5113 Support

Document Element: Regional Context

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

Summary:

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

Full text:

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

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

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

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

Annex 1 – General Conformity with Future Wales

• No significant concerns

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

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

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the

Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

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

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5

totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

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

plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

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

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

Gypsy and Travellers

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

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

Renewable Energy

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

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

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

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

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

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

Minerals

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

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

BMV Agricultural Land

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

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

• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

5686 Support

Document Element: Regional Context

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy welcomes the inclusion of the Cardiff Capital Region City Deal and the CCR Regional Economic and Industrial Plan within the Regional Context of the RLDP. The reference to CCR's acquisition of the former Aberthaw Power Station site to enable its demolition, remediation and redevelopment as a Green Energy Park highlights the site's regional significance and role in supporting growth in the green economy. This aligns with the Draft Regional Transport Plan, which identifies opportunities to investigate additional rail infrastructure and freight and passenger services at Aberthaw to maximise connectivity between road, rail, air and maritime networks.

Full text:

CCR Energy welcomes the inclusion of the Cardiff Capital Region City Deal and the CCR Regional Economic and Industrial Plan within the Regional Context of the RLDP. The reference to CCR's acquisition of the former Aberthaw Power Station site to enable its demolition, remediation and redevelopment as a Green Energy Park highlights the site's regional significance and role in supporting growth in the green economy. This aligns with the Draft Regional Transport Plan, which identifies opportunities to investigate additional rail infrastructure and freight and passenger services at Aberthaw to maximise connectivity between road, rail, air and maritime networks.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6803 Comment

Document Element: Regional Context

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Paragraph 2.50 - Regional Technical Statement for Aggregates (2020) Second Review:

We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027.

Note the comment as this will be a material consideration as the plan progresses.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~)."

"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states "The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority."
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
"In November 2021, the Welsh Government's Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel."
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that "There is an existing landbank of 18.73 million tonnes of crushed rock" is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states "The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP."
The "slight surplus" referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states "The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation."
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that "The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process." This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states "the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered."
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or"
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."

MIN4 Sustainable Mineral Working.
This policy states
“Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:”
Object - This policy wording does not reflect PPW (5.11) which seeks to “promote” and not “prioritise” the use of recycled material and secondary aggregates.
Further the word “only” is superfluous and should be deleted.
Reword the policy
“Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:”

6.388 The wording states “In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction.”
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states “Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34).” As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of “overprovision”. Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text “Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027. This will be a material consideration as the plan progresses.

Sound: Not specified

Attachments:

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

6938 Comment

Document Element: Regional Context

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

Summary:

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

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

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

Full text:

Penarth Town Council Deposit RLDP Consultation Response

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

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

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

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

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

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

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

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

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

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

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

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

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

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and

energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

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

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

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

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

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

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

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

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

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

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

Footnotes

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

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

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

Change suggested by respondent:

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

Sound: Not specified

Attachments:

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

4656 Object

Document Element: Local Policy Context
Respondent: Mr Tim Griffiths [2578]

Summary:

If the council considers themselves to be green, Why do they keep moving the goalposts regarding Green Wedge Land? The council recently stated that CO2 emissions in Barry have risen 6%, so why do they insist on cramming more large housing developments in areas of high traffic movement

Full text:

If the council considers themselves to be green, Why do they keep moving the goalposts regarding Green Wedge Land? The council recently stated that CO2 emissions in Barry have risen 6%, so why do they insist on cramming more large housing developments in areas of high traffic movement

Change suggested by respondent:

Maybe the planners need to look more at the areas infrastucture to relieve areas of increasing traffic flow eg Dinas Powis bypass and volume of traffic along the length of A4226 Port Rd

Sound: No
Attachments: None

5449 Object

Document Element: Local Policy Context
Respondent: Mr David Entwistle [3264]

Summary:

The plan in no way meets the stated goals of addressing climate and nature emergencies nor makes any attempt it seems to hit the stated goals of a more resilient,greener, active and healthier vale. This section is so vague, it in no way addresses how these goals are intended to be attempted. It feels like the goals have been set by one committee then the ideas have been originated by another having not even read the stated goals.

Full text:

The plan in no way meets the stated goals of addressing climate and nature emergencies nor makes any attempt it seems to hit the stated goals of a more resilient,greener, active and healthier vale. This section is so vague, it in no way addresses how these goals are intended to be attempted. It feels like the goals have been set by one committee then the ideas have been originated by another having not even read the stated goals.

Change suggested by respondent:

The goals need to be further reaching and in greater depth and clarity along with a clear summarised action plan of how these goals can be achieved. Measurable figures needs to be put to these goals. For example a net increase of x amount of green space by the year 2030 or aim to increase participation in regular outdoor healthy activities by x amount in 2030 from x amount in 2026.

Sound: No
Attachments: None

6641 Comment

Document Element: Local Policy Context
Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

We welcome that the Vale of Glamorgan Council has declared a ‘nature emergency’ and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We appreciate that the deposit plan’s policies seek to mitigate against these potential adverse effects with detailed wording and requirements. However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development

Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or

secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy

approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of
nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

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

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

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites

Overview
We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

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

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

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

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.

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

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

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

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

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

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

Change suggested by respondent:

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

Sound: Not specified

Attachments:

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

5688 Support

Document Element: Local Policy Context

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy welcomes the recognition within the Vale of Glamorgan Corporate Plan 2025–2030 of the Council's commitment to delivering a Replacement Local Development Plan that balances sustainable growth with environmental, social and cultural needs. The specific reference to supporting the development of the Cardiff Capital Region Energy site (formerly Aberthaw Power Station) is strongly supported. The redevelopment of the site as a Green Energy, Innovation and Employment Park aligns with the Corporate Plan's well-being objectives by creating high-quality employment, fostering innovation, enhancing the local environment, and contributing to the Vale of Glamorgan's wider economic and community prosperity.

Full text:

CCR Energy welcomes the recognition within the Vale of Glamorgan Corporate Plan 2025–2030 of the Council's commitment to delivering a Replacement Local Development Plan that balances sustainable growth with environmental, social and cultural needs. The specific reference to supporting the development of the Cardiff Capital Region Energy site (formerly Aberthaw Power Station) is strongly supported. The redevelopment of the site as a Green Energy, Innovation and Employment Park aligns with the Corporate Plan's well-being objectives by creating high-quality employment, fostering innovation, enhancing the local environment, and contributing to the Vale of Glamorgan's wider economic and community prosperity.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6650 Object

Document Element: Local Policy Context

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

Summary:

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is

addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure

We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger “policy hook” within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
“the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale.”
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
“Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value”.
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered. We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term “high ecological value” in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan’s alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

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

for all development.

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

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites.

This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

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

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

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

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

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

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

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

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

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

Change suggested by respondent:

Paragraph 2.81-amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

Sound: Not specified

Attachments:

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

VALE OF GLAMORGAN KEY CHARACTERISTICS

5450 Object

Document Element: 3 THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Respondent: Mr David Entwistle [3264]

Summary:

Barry is not the most sustainable location for new development. If the council listened to residents it would realise most residents do not find the current infrastructure adequate enough and strongly oppose new development and population growth until infrastructure and facilities can meet the demand of the existing population.

Full text:

Barry is not the most sustainable location for new development. If the council listened to residents it would realise most residents do not find the current infrastructure adequate enough and strongly oppose new development and population growth until infrastructure and facilities can meet the demand of the existing population.

Change suggested by respondent:

Identify the reality that Barry is not currently the most sustainable option for new development until infrastructure in the form of roading, public transport, healthcare and education facilities are upgraded to a level with excess capacity over what is currently required.

Sound: No

Attachments: None

5645 Object

Document Element: 3 THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Respondent: Ms Ann Barnaby [1702]

Summary:

The census of working population should be undated 2011 - 15yrs out of date with significant changes in the Vale with loss of MOD St Athan workforce, and more recently St Athan Power Station, makes this document to be not suitable for evidence base for the LDP in respect of infrastructure and housing need.
The LDP should focus on the Well-being of residents present and potentially new - traffic congestion, space in local schools, doctors etc., and green space/trees should be a significant consideration in this plan!

Full text:

This LDP is not sound on a number of significant areas'
Housing - is too geared towards where land owners and developers 'want' to build rather than any overall sound 'planning' strategy. Not enough engagement with local communities. Building to tick box of Welsh Government rather than a sustainable need - in particular with regard to connectivity the census of working residents is well out of date . Within the yrs out of date, since this time we have lost work at former RAF base St Athan, The Power Station and more! This census should be updated before any sound plan can be made towards housing and infrastructure. In the documents migration is identified as largest movement is from Cardiff to the Vale. Therefore connectivity should will be a major impact to the 'well-being' of residents as they attempt to travel back to Cardiff or wider area for work. Updating the work demographic should be a foundation of the policy. While affordable homes is a need building them to sale only works for the short term, as they are more likely to be sold on at full market value. St Athan has been identified as a deprived area of the Vale next to areas of Barry. Yet I can see no evidence in the plans to change this, the number of low value housing is high in this area with the former RAF houses and this should be taken into account with the number of additional ones added in the extensive housing allocation for this area. The Vale of Glamorgan spent a lot of money on the 'Well being survey' lets see some outcome - St Athan has a lack of 'green space', trees and recreation facilities.

Retail - There is mention of a need for extra shopping allocation in the Llantwit Major area - again let us look at sound planning rather than where the developer found a field to buy! The best place would be in the Town Centre, but without the space the next most logical and sustainable site for an additional supermarket would between the vastly enlarged St Athan and more affluent Llantwit Major - a site on the former RAF St Athan would make much more planning sense, being accessible with excellent walking and cycling, bus, and vehicle access for both communities.

Change suggested by respondent:

Working population census should be updated and make a significant contribution to the long term plans of the area. More dialogue with the Welsh Government regarding allocation of affordable homes in special areas to enhance well-being and deviation to enable more green space and better planning. In addition more dialogue with WG regarding the St Athan enterprise zone to ensure a more sustainable plan releasing land for retail, small industrial units etc.,

Sound: No

Attachments: None

5691 Support

Document Element: 3 THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy welcomes the recognition of the Vale of Glamorgan's progress in reducing carbon emissions, particularly through the closure of Aberthaw Power Station. The proposed redevelopment of the former Aberthaw site as a Green Energy, Innovation and Employment Park presents a significant opportunity to further reduce emissions, support renewable and low-carbon energy generation, and contribute to the Vale's net-zero ambitions. By integrating energy innovation, sustainable design, and green infrastructure, the proposals will help address remaining emissions from buildings, transport, and industry, while enhancing local resilience to climate change and flood risk, in line with the Vale's strategic objectives.

Full text:

CCR Energy welcomes the recognition of the Vale of Glamorgan's progress in reducing carbon emissions, particularly through the closure of Aberthaw Power Station. The proposed redevelopment of the former Aberthaw site as a Green Energy, Innovation and Employment Park presents a significant opportunity to further reduce emissions, support renewable and low-carbon energy generation, and contribute to the Vale's net-zero ambitions. By integrating energy innovation, sustainable design, and green infrastructure, the proposals will help address remaining emissions from buildings, transport, and industry, while enhancing local resilience to climate change and flood risk, in line with the Vale's strategic objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6338 Object

Document Element: 3 THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Respondent: Penllyn Community Council (Clerk) [243]

Summary:

3.11 The lowest tier consists of 54 hamlets and smaller rural settlements of the Vale. These are largely comprised of either a small group of dwellings or more sporadic/ dispersed and loose knit groups of residential properties…

THE DESCRIPTION IN THIS PARAGRAPH IS INCOMPLETE/ INACCURATE IN THAT IT FAILS TO ACKNOWLEDGE THAT MANY OF THESE SETTLEMENTS, ALTHOUGH SMALLER, ARE DISTINCT COMMUNITIES WITH FACILITIES SUCH AS CHURCHES, COMMUNITY HALLS., PUBS AND SCHOOLS EQUIVALENT TO THOSE IN THE MINOR RURAL SETTLEMENTS CATEGORY.
THE POPULATION/SIZE IS OFTEN ARTIFICIALLY REDUCED IN THE REVIEW BY DELIBERATELY DIVIDING ADJACENT SETTLEMENTS WHICH EFFECTIVELY WORK AS ONE COMMUNITY EG CITY AND LLANSANNOR.

Full text:

Summary: 3.11 The lowest tier consists of 54 hamlets and smaller rural settlements of the Vale. These are largely comprised of either a small group of dwellings or more sporadic/ dispersed and loose knit groups of residential properties…

THE DESCRIPTION IN THIS PARAGRAPH IS INCOMPLETE/ INACCURATE IN THAT IT FAILS TO ACKNOWLEDGE THAT MANY OF THESE SETTLEMENTS, ALTHOUGH SMALLER, ARE DISTINCT COMMUNITIES WITH FACILITIES SUCH AS CHURCHES, COMMUNITY HALLS., PUBS AND SCHOOLS EQUIVALENT TO THOSE IN THE MINOR RURAL SETTLEMENTS CATEGORY.
THE POPULATION/SIZE IS OFTEN ARTIFICIALLY REDUCED IN THE REVIEW BY DELIBERATELY DIVIDING ADJACENT SETTLEMENTS WHICH EFFECTIVELY WORK AS ONE COMMUNITY EG CITY AND LLANSANNOR.

Change suggested by respondent:

Amend paragraph 3.11

Sound: Not specified

Attachments:

Email representation - https://valeofglamorgan.oc2.uk/a/thm

RLDP KEY THEMES, VISION AND OBJECTIVES

4566 Comment

Document Element: KEY THEMES

Respondent: Mr David Barton [2683]

Summary:

Traditional Architecture Design Codes should have its own section comprising the 10th RLDP Key Theme.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

TA Design Codes should have its own section comprising the 10th RLDP Key Theme.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4660 Object

Document Element: KEY THEMES

Respondent: Mr Tim Griffiths [2578]

Summary:

In the statements "Building A Prosperous And Green Economy" and "Protecting And Enhancing The Natural Enviroment " I find them hypocritical in the way the plan wants to build on Green Wedge land and countryside near nature conservation areas. eg Land near Weycock Cross (green wedge land) Cosmeston Lakes

Full text:

In the statements "Building A Prosperous And Green Economy" and "Protecting And Enhancing The Natural Enviroment " I find them hypocritical in the way the plan wants to build on Green Wedge land and countryside near nature conservation areas. eg Land near Weycock Cross (green wedge land) Cosmeston Lakes

Change suggested by respondent:

Keep to what is previously been areas of protection because in my mind Council stands for:
C concrete
O over
U until
N no
C countryside
I is
L left
What a reputation to have

Sound: No

Attachments: None

5299 Comment

Document Element: KEY THEMES
Respondent: Mr Ken Timmins [1489]

Summary:
The key themes are great but the LDP fail to actually offer solutions or address the real issues that people face daily e.g. housing costs, the rising price of fuel and quiet communities being blighted by more and more development. There is lots of fine talk in this plan but no evidence that it will improve the daily life of people living in the Vale. The feeling is that communities are being trampled over by self interested authorities and people feel helpless. My opinion is based on contributions at public meetings regarding this plan.

Full text:
The key themes are great but the LDP fail to actually offer solutions or address the real issues that people face daily e.g. housing costs, the rising price of fuel and quiet communities being blighted by more and more development. There is lots of fine talk in this plan but no evidence that it will improve the daily life of people living in the Vale. The feeling is that communities are being trampled over by self interested authorities and people feel helpless. My opinion is based on contributions at public meetings regarding this plan.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5451 Object

Document Element: KEY THEMES
Respondent: Mr David Entwistle [3264]

Summary:
The key themes do not go far enough and lack measurable goals. There is no real accountability to these goals. Instead of stating simply things like "Prioritise climate change adaption and mitigation" they should set a concrete goal that can be held accountable with figures and data.

Full text:
The key themes do not go far enough and lack measurable goals. There is no real accountability to these goals. Instead of stating simply things like "Prioritise climate change adaption and mitigation" they should set a concrete goal that can be held accountable with figures and data.

Change suggested by respondent:
There should be quantifiable goals in these key themes. ie ensure all new housing built in the vale exceeds the goals set for new builds in terms of meeting the Uk future homes standard. Or increasing the number of journeys undertaken by active travel from x percent to x percent.

Sound: No
Attachments: None

6191 Support

Document Element: KEY THEMES
Respondent: Mr David Ambrose [3488]

Summary:
All nine of these Key Themes are vital for our community of Wick.

Full text:
All nine of these Key Themes are vital for our community of Wick.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

6767 Support

Document Element: KEY THEMES
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon supports the themes of Homes for all, Placemaking and Promoting Active Travel and Sustainable Transport Choices.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

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

Section 3: Key Characteristics

Settlement Pattern

In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Market and Housing Need

In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives

Key Themes

Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

Vision

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

facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.

As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's 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.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within

the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys.

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

Policy SSC1 – Development within Settlement Boundaries

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

Policy SP4 – Placemaking

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

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

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

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

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

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

Policy PGD2 – Residential Development Densities

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

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs

and incorporate a mix of tenures that directly responds to the Vale's LHMA/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.

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

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

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

Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane

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

Unsustainable Location & Poor Connectivity

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

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

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using 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.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to

ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current

dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced 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. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

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

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

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

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

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

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

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

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of 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. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/38r

6900 Support

Document Element: KEY THEMES

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

Barratt Redrow supports the themes of Homes for all, Placemaking and Promoting Active Travel and Sustainable Transport Choices.

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
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• 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
•

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

4567 Comment

Document Element: VISION (2021 - 2036)

Respondent: Mr David Barton [2683]

Summary:

Integrate Traditional Architecture as the forefront driver for universal success across all aspects.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

Integrate TA as the forefront driver for universal success across all aspects.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4661 Object

Document Element: VISION (2021 - 2036)

Respondent: Mr Tim Griffiths [2578]

Summary:

Vision already fails in the 6% increase in CO2 in Barry in their recent survey

Full text:

Vision already fails in the 6% increase in CO2 in Barry in their recent survey

Change suggested by respondent:

Net Zero impossible to achieve

Sound: No

Attachments: None

5042 Object

Document Element: VISION (2021 - 2036)

Respondent: Mrs Wendy Hussey [3085]

Summary:

The people of Barry have been let down so many times. Lack of faith that things will improve. Don’t waste our money. Protect our green spaces.

Full text:

The people of Barry have been let down so many times. Lack of faith that things will improve. Don’t waste our money. Protect our green spaces.

Change suggested by respondent:

It is an idealistic plan that the council will never be able to complete.

Sound: No

Attachments: None

5405 Object

Document Element: VISION (2021 - 2036)
Respondent: Emma Reed [2653]

Summary:
Again lots of words but the metro does not cover the areas of Rhoose and St Athan and the plan allocates lots of houses in these areas but no additional transport infrastructure. The development where located will increase the need to travel by car.

Full text:
Again lots of words but the metro does not cover the areas of Rhoose and St Athan and the plan allocates lots of houses in these areas but no additional transport infrastructure. The development where located will increase the need to travel by car.

Change suggested by respondent:
Remove reference to SW Metro.

Sound: No
Attachments: None

5406 Object

Document Element: VISION (2021 - 2036)
Respondent: Emma Reed [2653]

Summary:
Is the Marina actually happening?

Full text:
Is the Marina actually happening?

Change suggested by respondent:
Remove reference to Marina

Sound: No
Attachments: None

5452 Object

Document Element: VISION (2021 - 2036)
Respondent: Mr David Entwistle [3264]

Summary:
The vision is too vague. Quantifiable goals with figures need to set and prominent in the wording of the vision statement. At present the statement is weak and gives too much opportunity for future councils to say they have met the vision goals by undertaking simple improvements. For example "the creation of new habitats", by 2036 if one new small wetland area has been created for example that could be interpreted as we met our vision.

Full text:
The vision is too vague. Quantifiable goals with figures need to set and prominent in the wording of the vision statement. At present the statement is weak and gives too much opportunity for future councils to say they have met the vision goals by undertaking simple improvements. For example "the creation of new habitats", by 2036 if one new small wetland area has been created for example that could be interpreted as we met our vision.

Change suggested by respondent:
Quantifiable goals with figures need to be included in the headline vision statement that challenge the council to hold itself to high standards and strive to achieve real improvement. For example a net increase in the amount of native habitat in the vale by x acres or x percent.

Sound: No
Attachments: None

5882 Comment

Document Element: VISION (2021 - 2036)

Respondent: HBF (Mr Mark Harris) [538]

Summary:

HBF considers the vision is far too wordy to be clear or measurable.

The vision mentions a Marina; should this be removed following recent funding decisions?

Full text:

HBF considers the vision is far too wordy to be clear or measurable.

The vision mentions a Marina; should this be removed following recent funding decisions?

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5694 Support

Document Element: VISION (2021 - 2036)

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy welcomes the Vale of Glamorgan RLDP Key Themes, Vision, and Objectives, which set a clear ambition for the region to achieve zero carbon by 2030 and promote exemplar environmental design and performance. The redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park aligns strongly with these objectives, establishing the Vale as a regional hub for renewable and green energy innovation and zero-carbon manufacturing. The proposals will support sustainable economic growth, high-quality employment, and education opportunities, while demonstrating best practice in climate change mitigation, adaptation, and efficient resource use across the Vale

Full text:

CCR Energy welcomes the Vale of Glamorgan RLDP Key Themes, Vision, and Objectives, which set a clear ambition for the region to achieve zero carbon by 2030 and promote exemplar environmental design and performance. The redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park aligns strongly with these objectives, establishing the Vale as a regional hub for renewable and green energy innovation and zero-carbon manufacturing. The proposals will support sustainable economic growth, high-quality employment, and education opportunities, while demonstrating best practice in climate change mitigation, adaptation, and efficient resource use across the Vale

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6178 Comment

Document Element: VISION (2021 - 2036)
Respondent: Professor Andrew Vincent [920]

Summary:

There is sadly nothing sustainable, vibrant or inclusive in the RLDP. It is a confusing dystopian vision. The RLDP is an immensely clumsy, badly-designed, overlong and ill-organized entity.

Full text:

There is sadly nothing sustainable, vibrant or inclusive in the RLDP. It is a confusing dystopian vision. The RLDP is an immensely clumsy, badly-designed, overlong and ill-organized entity. Vale Planning in fact have a public duty of care for local residents, namely, to minimally help and facilitate public understandings of the issues. Sadly they entirely failed in this basic responsibility. Intentionally or not Vale Planning quite literally dumped thousands of pages of overly technical documents on the website with little or no regard, guidance or clear pathways for ordinary readers, which is an unforgivable administrative lapse. This makes the whole consultation process largely inaccessible to ordinary folk and those who have limited digital skills or limited time due to responsibilities. In point, for those with limited digital skills, the online RLDP offends against basic principles of natural justice. It is intrinsically discriminatory against those who found it impossible to navigate.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6891 Support

Document Element: VISION (2021 - 2036)
Respondent: Catesby Estates [3713]
Agent: Turley

Summary:

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.

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.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6930 Comment

Document Element: VISION (2021 - 2036)

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

Summary:

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.

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
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• 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.
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• 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.
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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'.
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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

Change suggested by respondent:

The ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised in the Vision.

Sound: Not specified

Attachments:

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

6931 Comment

Document Element: VISION (2021 - 2036)

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

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.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the

proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within

the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's 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.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP

Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above

an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified "has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).".

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle

the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/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.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using 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.

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

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

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

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

Policy HG3 – Housing Led Redevelopment Opportunity

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

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

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

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

Policy SP7 – Affordable Housing Provision

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

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

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

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

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

Policy SP8 – Affordable Housing Requirements

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

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

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

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

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

Policy TR1 – Transport Proposals

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

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

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

Policy SP13 – Community Infrastructure and Planning Obligations

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

Policy CI1 – Open Space Provision

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

thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced 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. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the

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

Policy DNP1 – Special Landscape Areas

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

Policy DNP2 – Green Wedges

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

Policy DNP8 – Severn Estuary Recreational Pressure

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

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of 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. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

The ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised in the Vision.

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/38r

4568 Comment

Document Element: STRATEGIC OBJECTIVES

Respondent: Mr David Barton [2683]

Summary:

Academic studies prove the merits of Traditional Architecture which now has to be formally recognised as such.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

Academic studies prove the merits of TA which now has to be formally recognised as such.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4576 Comment

Document Element: STRATEGIC OBJECTIVES

Respondent: Mr David Barton [2683]

Summary:

Fine in theory but TA needs to be at the hear of this objective.

Full text:

Fine in theory but TA needs to be at the hear of this objective.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5041 Object

Document Element: STRATEGIC OBJECTIVES

Respondent: Mrs Wendy Hussey [3085]

Summary:

Protection of the environment. How is this going to be possible if you keep building houses on green field sites.
Travel. There is a lack of public transport. Particularly buses. How can those without cars access banks, post offices etc,

Full text:

Protection of the environment. How is this going to be possible if you keep building houses on green field sites.
Travel. There is a lack of public transport. Particularly buses. How can those without cars access banks, post offices etc,

Change suggested by respondent:

It needs to address core problems. Lack of schools, not enough doctors or dentists to support a growing population.
Traffic, an ever growing problem.

Sound: No

Attachments: None

4697 Comment

Document Element: STRATEGIC OBJECTIVES

Respondent: Heneb (Ms Judith Doyle, Stewardship Officer) [687]

Summary:

I appreciate the opportunity to advise on the Welsh Unitary Authorities' planning documents concerning archaeology and the historic environment. These elements are vital to regional heritage, and the policies ensure their sustainable management, protection, and understanding within planning processes. The plan addresses designated and non-designated assets, including over 14,000 sites recorded by Heneb, and highlights the importance of managing change, considering long-term impacts, and integrating heritage into wider policy themes such as climate change and community wellbeing. We support developing supplementary guidance and remain committed to ongoing collaboration.

Full text:

Thank you for consulting us on these documents, as advisors to the Unitary Authorities in Wales regarding archaeology and the historic environment for planning,
pre-planning and heritage management matters.
As we have noted in responses to the consultations earlier in the Plan process, archaeology and the historic environment form an important part of the heritage of
this area.

By including Policies and Objectives via the RLDP system, this ensures change to archaeology and the historic environment is sustainably managed, understood, and protected within the planning context.

With SP4 Placemaking, DNP4 Historic Environment, Objective 6 Embracing Culture
and Heritage, and a Key Theme Embracing Culture and Heritage, the Deposit Plan ensures that archaeology and the historic environment are protected and due consideration given when considering change. The provisions directly involve awareness and management of change that may impact physical remains, and considers the longer term impacts of change, including to setting, both positive and negative.

It should be noted that archaeology and the historic environment contribute to other Policies, Objectives and Themes. Climate Change impacts directly on archaeological features and sites, as well as the interaction of people and archaeological sites. Interaction and engagement with archaeology and the historic
environment on walks, events, etc can foster and benefit physical and mental well being, involvement in community with shared experience and heritage, and inspire and support tourism.
As noted in the Plan, archaeology and the historic and built environment includes a wide range of both statutorily designated historic assets as well as non-designated
historic assets: areas of land, structures, artefacts, and buried archaeological remains. As time periods, the range of sites includes artefacts, buried and upstanding remains from the prehistoric to modern. It can encompass industrial and military, be large scale representation of minerals and metals extraction, transportation and land
and water management, as well as prehistoric upland settlement patterns and information on isolated finds of all periods, all of which contribute to the region's
distinctive heritage and current form.

The remit of responsibility for statutorily protected sites falls to Cadw, and the nondesignated sites falls to Heneb: The Trust for Welsh Archaeology (formed by the merger of the four former Welsh Archaeological Trusts in 2024). We note the importance of the Historic Environment Record (HER) curated by Heneb, forms part of the Plan. The number of statutorily designated sites is noted in the Plan, but it is important to relay that the number of sites recorded within the HER is 14,434, many more than the statutorily designated sites.

The references to the Glamorgan Gwent Archaeological Trust should now read Heneb: The Trust for Welsh Archaeology, Glamorgan Gwent Archaeology, or Heneb GGA. The Historic Environment (Wales) Act 2023, and the resulting cascade of Policy, Advice and Best Practice Guidance provides a framework for the inclusion in Development Plans at a strategic level for managing change.

The constraints map includes some of the statutorily protected sites such as Scheduled Monuments, Listed Buildings and Registered Parks and Gardens, but
does not appear to include the Registered Landscapes (in the Vale's case, all of Llancarfan, Cadw reference HLW (SG)1, and part of Merthyr Mawr Kenfig and Margam Burrows, Cadw reference HLW (MGl)1).

At the key site and infrastructure levels, we have commented on Candidate Sites and proposed large scale developments and given advice for appropriate mitigation
measures; these are listed in the Plan with our advice.
Archaeology and the Historic Environment should not be seen as any constraint to development on any scale but as noted, viewed with the Well-being of Future Generations (Wales) Act, contributes substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining
goals.

We note the inclusion of the proposal to develop Supplementary Planning Guidance for Archaeology and the Historic Environment, and will continue to assist and support your Authority by collaborating with you on this.

Change suggested by respondent:

References to the Glamorgan Gwent Archaeological Trust should now read Heneb: The Trust for Welsh Archaeology, Glamorgan Gwent Archaeology, or Heneb GGA.

Sound: Not specified

Attachments:

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

5407 Object

Document Element: STRATEGIC OBJECTIVES
Respondent: Emma Reed [2653]

Summary:
Objective 4 - the council has said on many occasions it has no influence on health transport etc.

Full text:
Objective 4 - the council has said on many occasions it has no influence on health transport etc.

Change suggested by respondent:
Objective 4 is meaningless

Sound: No
Attachments: None

5453 Object

Document Element: STRATEGIC OBJECTIVES
Respondent: Mr David Entwistle [3264]

Summary:
The main objectives are good but still too weak and lack figures and focus. They need to have quantifiable goals.

Full text:
The main objectives are good but still too weak and lack figures and focus. They need to have quantifiable goals.

Change suggested by respondent:
Set stronger and measurable objectives. For example "Reduce reliance on private car usage for work commutes from x percent to x percent" or "Ensure developments reduce the dependency on private car usage by integrating them into existing bus networks and siting them within a 15 minute journey of a supermarket".

Sound: No
Attachments: None

5846 Object

Document Element: STRATEGIC OBJECTIVES
Respondent: Mr Jeff Smith [3399]

Summary:
The concept of "zero carbon" in the given time-frame (2030) is not possible and by default it sets up all other premise to failure..
At no point has this addressed the need for accessible green space, increased and sustainable infrastructure and only then additional housing..

Full text:
The concept of "zero carbon" in the given time-frame (2030) is not possible and by default it sets up all other premise to failure..
At no point has this addressed the need for accessible green space, increased and sustainable infrastructure and only then additional housing..

Change suggested by respondent:
An outline of core infrastructure development -Sewage, water treatment, sub station capacity, generation capacity (solar on existing roofs + new builds - not on farmland) , tidal / nuclear at Aberthaw, etc to enable the existing infrastructure to meet the planned needs *before* embarking on new housing - My hometown was on of the "1960's new towns" the current set of housing being built there in the 2020's is only now using up the last of the reserved land - all roads, services and sewage capacity has been in place for decades - "active travel" was part of the plan from day 1.

This key infrastructure is missing from the vale and area planning - e.g. St Athan railway station is on the plan but has been in 'consultation' for decades - by building housing on the existing station halt it will require a track regrading and add several million to the cost -- Only once this is built should any additional housing that relies on it be built. The same applies for the current sewage spills after heavy rain - fix this before adding to the problems..

Sound: No
Attachments: None

5695 Support

Document Element: STRATEGIC OBJECTIVES

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy strongly supports Objective 9 of the RLDP to build a prosperous and green economy. The redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park will deliver high-quality and skilled employment, training, and education opportunities, reinforcing the Vale of Glamorgan as a hub for renewable and low-carbon technologies. The proposals also support wider economic diversification by creating opportunities for business premises and employment within rural settlements and facilitating the growth of rural enterprises. This aligns with the RLDP's objectives to foster sustainable economic growth, innovation, and inclusive prosperity across the Vale

Full text:

CCR Energy strongly supports Objective 9 of the RLDP to build a prosperous and green economy. The redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park will deliver high-quality and skilled employment, training, and education opportunities, reinforcing the Vale of Glamorgan as a hub for renewable and low-carbon technologies. The proposals also support wider economic diversification by creating opportunities for business premises and employment within rural settlements and facilitating the growth of rural enterprises. This aligns with the RLDP's objectives to foster sustainable economic growth, innovation, and inclusive prosperity across the Vale

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6618 Comment

Document Element: STRATEGIC OBJECTIVES

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

1. Mitigating and adapting to climate change - There are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and stolen property from within the home as a result of criminal acts.
2. Improving mental and physical health and well-being - Poorly designed and specified public realm and communal areas have the potential to generate crime, the fear of crime and anti-social behaviour.
3. Homes for all - South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design. Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of VAWG.
5. Protecting and enhancing the natural environment - South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate

in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early

consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where “qualifying activities” take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: “Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach” (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states ‘The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.’
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council’s standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must

have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure 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. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South

Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.

8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon

footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure

Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6228 Object

Document Element: STRATEGIC OBJECTIVES

Respondent: Associated British Ports (Mr Will Ryan, Land & Planning Manager) [2477]

Summary:

The text within Objective 9 should be amended to include reference to the Port of Barry

Full text:

ABP requests that Objective 9 is amended to include reference to the Port of Barry as one of the "important employment areas".

ABP is the UK's leading and best-connected port owner and operator with a network of 21 ports around the UK which offer unparalleled marine, road and rail access to domestic and international markets. Included within ABP's ownership are five ports across Wales which includes the Port of Barry ('the Port').

The Port covers an area of approximately 240ha (including 69ha seaward) within the heart of Barry, with shipping access via the Bristol Channel. A number of buildings and land within the Port are leased to other operators for port, port-related and non-port activities.

The Port remains one of the major ports and trading hub for businesses in Wales and elsewhere in the UK. The operational port and docks is an important commercial asset, providing jobs and business opportunities that contribute towards economic regeneration and international trade. It provides a strong multi-modal offering, with direct links to the national rail network and proximity to the M4.

Flexibility and responsiveness is key in a commercial environment, and there is a need to respond to changing demands – now and in the future. ABP has identified that there are many opportunities to develop and grow new businesses for the future and undertake complementary development through careful business planning and site-wide master planning activities. This is recognised elsewhere within the Deposit Draft Plan.

ABP's publication 'Future ports: Wales vision' (2021) recognises that its Welsh ports are going to be hugely important assets in helping Wales make the strategic realignments demanded by decarbonisation and digitisation, and will play a decisive role in any economic transformation. Across its South Wales estate, ABP sees opportunities for its ports, land and infrastructure to decarbonise energy generation, in manufacturing and logistics while also offering opportunity to create growth environments for communities, businesses and ecosystems across a wide range of land uses. By 2030, ABP has the ambition that its South Wales ports will have translated their central role in the first industrial revolution into a key role in the decarbonisation and digitisation revolutions of the future.

In Barry, not least by virtue of the physical size and location of the land (and the docks), the future development of the Port is clearly an important consideration for the RLDP in terms of economic strategy, land use planning and sustainable development.

The significance of the Port in contributing to the economic success and growth of Barry is recognised within the Employment Land Study that forms part of the Evidence Base of the RLDP. In delivering its economic and jobs growth strategy, the new Plan must play its part in delivering, and protecting the range and choice of employment land and business premises at sustainable locations across the Vale. The multi-modal connections and the range of existing and potential employment sites is such that the Port has played, and will continue to play, an important role in this key objective. A thriving Port means a thriving Barry.

The Draft RLDP recognises the significance the Port of Barry within its other strategies and policies, including at Strategic Growth Policy (6) and within Policies EMP1 and EMP3. These propose an approach that places the Port on a par with other major and important employment growth opportunities. These are recognised and promoted within Strategic Objective 9, and ABP consider that the Port of Barry should be given an equal billing and equal promotion.

This approach is given greater weight in so far as the Port has the potential to provide an alternative form of employment offering to the other sites, that focuses more on B2, B8 and Port-related opportunities that do exist elsewhere.

This variety of employment uses should be reflected in Objective 9, and text should be amended to include reference to the Port of Barry as set out below:

Promote Cardiff Airport and Bro Tathan Enterprise Zone, the Port of Barry and the former Aberthaw power station site, as important employment areas, enabling delivery of high-quality and skilled jobs, training, and education opportunities. Support diversification of the rural economy, enabling opportunities to provide employment and business premises within rural settlements and facilitate the growth in rural enterprises.

Change suggested by respondent:

The text in Objective 9 should be amended to include reference to the Port of Barry as set out below:

Promote Cardiff Airport and Bro Tathan Enterprise Zone, the Port of Barry and the former Aberthaw power station site, as important employment areas, enabling delivery of high-quality and skilled jobs, training, and education opportunities. Support diversification of the rural economy, enabling opportunities to provide employment and business premises within rural settlements and facilitate the growth in rural enterprises.

Sound: Yes

Attachments: None

6768 Support

Document Element: STRATEGIC OBJECTIVES

Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon supports the principle of Objective 3 - Homes for All, 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.

They also support Objective 4 - Placemaking and Objective 8 - Promoting Active and Sustainable Travel Choices.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

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

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.

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

Vision

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

The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.

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

Strategic Objectives

Objective 3 – Home for All

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

Objective 4 – Placemaking

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

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

Objective 8 – Promoting Active and Sustainable Travel Choices

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

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

Section 5: Sustainable Growth Strategy

RLDP Sustainable Growth Strategy comprises six key elements as follows:

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

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

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

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

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

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

From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's 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.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the

past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport. Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

Policy SSC1 – Development within Settlement Boundaries

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

Policy SP4 – Placemaking

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

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

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

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

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the

planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation

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

The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/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.

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

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

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

Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane

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

Unsustainable Location & Poor Connectivity

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

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

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using 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.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to

uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes

access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

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

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced 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. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

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

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

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

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

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

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy

framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

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

Policy DNP2 – Green Wedges

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

Policy DNP8 – Severn Estuary Recreational Pressure

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

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of 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. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/38r

6892 Support

Document Element: STRATEGIC OBJECTIVES

Respondent: Catesby Estates [3713]

Agent: Turley

Summary:

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.

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.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6901 Support

Document Element: STRATEGIC OBJECTIVES
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

Barratt Redrow supports the principle of Objective 3 - Homes for All, 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.

They also support Objective 4 - Placemaking and Objective 8 - Promoting Active and Sustainable Travel Choices.

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
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• 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
•

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

Change suggested by respondent:
-

Sound: Not specified

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

SUSTAINABLE GROWTH STRATEGY

5408 Object

Document Element: Delivering a sustainable

Respondent: Emma Reed [2653]

Summary:

There needs to be an SDP in place to ensure that the Vale does not over provide for housing creating increased need to travel by unsustainable means.

Full text:

There needs to be an SDP in place to ensure that the Vale does not over provide for housing creating increased need to travel by unsustainable means.

Change suggested by respondent:

SDP needs to be prepared before this RLDP is approved. The Plan is being prepared in a vacuum

Sound: No

Attachments: None

6834 Comment

Document Element: Delivering a sustainable

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

Summary:

National Grid Electricity Transmission (NGET) is modernizing the UK's energy network to support the transition to renewable energy. This requires significant infrastructure upgrades to connect offshore wind and international subsea links, specifically increasing capacity between the North, Midlands, and South through the Great Grid Upgrade.

To support these goals, the Council's planning strategy should focus on the following:

•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.

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/

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6896 Support

Document Element: Delivering a sustainable

Respondent: Catesby Estates [3713]

Agent: Turley

Summary:

Catesby argues that the proposed housing figures remain insufficient. They contend that the growth level is too low when measured against the aspirations of Future Wales and the most recent population and household projections. Catesby suggests that a more robust and ambitious growth strategy is necessary to meet the actual housing needs of the Vale, advocating for an upward revision of the total requirement.

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.

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.

Change suggested by respondent:

Catesby suggest that the level of growth is 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.

Sound: Not specified

Attachments:

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

6769 Support

Document Element: Aligning locations for new
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords

with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's 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.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it

relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

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

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

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

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

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

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

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

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

Policy SSC1 – Development within Settlement Boundaries

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

Policy SP4 – Placemaking

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

sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background

regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/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.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for

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

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

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using 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.

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

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

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

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

Policy HG3 – Housing Led Redevelopment Opportunity

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

Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway

improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

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

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

Policy SP13 – Community Infrastructure and Planning Obligations

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

Policy CI1 – Open Space Provision

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

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

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

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

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced 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. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

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

RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of 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. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/38r

6902 Support

Document Element: Aligning locations for new

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

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.

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.
•

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

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.

• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
•

Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

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

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted

Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
•

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

5409 Object

Document Element: Aligning locations for new

Respondent: Emma Reed [2653]

Summary:

The plan has not done this and is actually creating the need to travel more by allocating housing land in settlements such as Rhoose which only have one bus service 304 (NOTE 905 is not a proper service as it only does to teh airport from the train) and one train an hour generally with just two carriages.

Full text:

The plan has not done this and is actually creating the need to travel more by allocating housing land in settlements such as Rhoose which only have one bus service 304 (NOTE 905 is not a proper service as it only does to teh airport from the train) and one train an hour generally with just two carriages.

Change suggested by respondent:

Bus services every 20 minutes in Rhoose and trains every 30 minutes. A comprehensive school for Rhoose.

Sound: No

Attachments: None

5668 Comment

Document Element: Aligning locations for new
Respondent: Councillor Samantha Campbell [1002]

Summary:
This has not been adhered to within this plan.

Full text:
This has not been adhered to within this plan.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5045 Object

Document Element: Focusing development at
Respondent: Mrs Wendy Hussey [3085]

Summary:
Have a cohesive transport plan. The town needs it. We are living at present where there are more people living here but less and less transport provision for local residents.

Full text:
Have a cohesive transport plan. The town needs it. We are living at present where there are more people living here but less and less transport provision for local residents.

Change suggested by respondent:
Make it a simple but clear document.

Sound: No
Attachments: None

5410 Object

Document Element: Focusing development at
Respondent: Emma Reed [2653]

Summary:
Rhoose isnt mentioned here and yet it is taking some 10 percent of growth. St Athan has no certainty of a train station. It is not part of the metro.

Full text:
Rhoose isnt mentioned here and yet it is taking some 10 percent of growth. St Athan has no certainty of a train station. It is not part of the metro.

Change suggested by respondent:
Delete Readers ways allocation as its not sustainable and no more development should occur here until infrastructure is improved.

Sound: No
Attachments: None

5699 Support

Document Element: Focusing development at

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy welcomes the RLDP's emphasis on focusing development in locations well served by existing and proposed rail infrastructure, including the South Wales Metro. The redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park aligns with these objectives, supporting trip generation that can underpin a new rail station at St Athan. The proposals complement wider regional transport initiatives, including opportunities for additional freight and passenger services at Aberthaw / St Athan, promoting sustainable transport, reducing car dependency, and supporting the Vale of Glamorgan's ambitions for low-carbon, accessible, and well-connected communities.

Full text:

CCR Energy welcomes the RLDP's emphasis on focusing development in locations well served by existing and proposed rail infrastructure, including the South Wales Metro. The redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park aligns with these objectives, supporting trip generation that can underpin a new rail station at St Athan. The proposals complement wider regional transport initiatives, including opportunities for additional freight and passenger services at Aberthaw / St Athan, promoting sustainable transport, reducing car dependency, and supporting the Vale of Glamorgan's ambitions for low-carbon, accessible, and well-connected communities.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6770 Support

Document Element: Focusing development at

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

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.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern

In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's 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.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

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

deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of

dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical

and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate

understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/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.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the

proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.

Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane

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

Unsustainable Location & Poor Connectivity

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

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

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using 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.

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

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

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

application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

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

Policy HG3 – Housing Led Redevelopment Opportunity

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

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

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

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

Policy SP7 – Affordable Housing Provision

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

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

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

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

Policy SP8 – Affordable Housing Requirements

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

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

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

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

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and

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

Policy TR1 – Transport Proposals

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

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

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

Policy SP13 – Community Infrastructure and Planning Obligations

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

Policy CI1 – Open Space Provision

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

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

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

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

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced 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. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of 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. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/38r

6903 Support

Document Element: Focusing development at
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

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.

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 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.

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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• 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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• 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
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• 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:
•

Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

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

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning

permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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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.
•

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.
•

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

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

Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it

difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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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:
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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'.
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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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

4476 Support

Document Element: Allowing for small scale

Respondent: Mr Rob G Thomas [683]

Summary:

This should be supported and supplied as there is a clear need for local indigenous youngsters futures or inevitable migration from these minor rural settlements will continue a pace

Full text:

This should be supported and supplied as there is a clear need for local indigenous youngsters futures or inevitable migration from these minor rural settlements will continue a pace

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4572 Comment

Document Element: Allowing for small scale

Respondent: Mr David Barton [2683]

Summary:

Traditional Architecture will afford the LA the ability to do many things conceived impossible previously through creating a proper settlement for everyone.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

TA will afford the LA the ability to do many things conceived impossible previously through creating a proper settlement for everyone.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4664 Support

Document Element: Allowing for small scale

Respondent: Mr Tim Griffiths [2578]

Summary:

Support

Full text:

.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5046 Object

Document Element: Allowing for small scale

Respondent: Mrs Wendy Hussey [3085]

Summary:

What does small scale comprise of. Will there be extra schools to cope with these challenges. Are there going to be more dentists and doctors to cope with challenges.

Full text:

What does small scale comprise of. Will there be extra schools to cope with these challenges. Are there going to be more dentists and doctors to cope with challenges.

Change suggested by respondent:

Start from the bottom up. Solve the problems that we already have before adding to them.

Sound: No

Attachments: None

4573 Support

Document Element: Supporting the role of

Respondent: Mr David Barton [2683]

Summary:

Excellent but integrate Traditional Architecture longer term to blend this setting in to the area.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

Excellent but integrate TA longer term to blend this setting in to the area.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4665 Support

Document Element: Supporting the role of

Respondent: Mr Tim Griffiths [2578]

Summary:

Support

Full text:

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Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5047 Object

Document Element: Supporting the role of

Respondent: Mrs Wendy Hussey [3085]

Summary:

Why is model farm being targeted again. It has been a part of Barry and much loved. It has tenanted by the same family for very many years. A piece of Barry's history that should be protected. Not destroyed

Full text:

Why is model farm being targeted again. It has been a part of Barry and much loved. It has tenanted by the same family for very many years. A piece of Barry's history that should be protected. Not destroyed

Change suggested by respondent:

Please rethink the destruction that will be caused to our environment if we keep letting housing developers buying of green field sites keep them for years. They can afford to wait and keep submitting planning applications. These companies don't consider green fields as anything precious.

Sound: No

Attachments: None

5466 Support

Document Element: Supporting the role of

Respondent: Mr David Entwistle [3264]

Summary:

Cardiff Airport is under utilised. The council needs to support increased services from Cardiff Airport. Public transport links to the airport are inadequate at present. While I support the idea of an enterprise zone and business developments at St Athan for example are positive I fear without major improvements in roading and transport links development of new enterprise areas will be in vain. Road links from the Vale to the M4 need to be considerably improved in order to attract major industry and business to the area first. This should be prioritised before the enterprise zones are developed.

Full text:

Cardiff Airport is under utilised. The council needs to support increased services from Cardiff Airport. Public transport links to the airport are inadequate at present. While I support the idea of an enterprise zone and business developments at St Athan for example are positive I fear without major improvements in roading and transport links development of new enterprise areas will be in vain. Road links from the Vale to the M4 need to be considerably improved in order to attract major industry and business to the area first. This should be prioritised before the enterprise zones are developed.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6187 Comment

Document Element: Supporting the role of

Respondent: Professor Andrew Vincent [920]

Summary:

The development of Cardiff airport is reasonable for the local economy. But Planning seems to be systemically blind. They are clearly not engaged in joined-up thinking. If the laudable aim is to develop Cardiff Airport and there is a major artery road connecting the airport to Cardiff and the M4, that is Port Road, going immediately past the KS1 site, would be it rational behavior to introduce another 700+ cars (from the KS1 site) disgorging immediately at the "pinch-point" of the Weycock Cross roundabout? Do the planners really imagine this will help future airport development?

Full text:

The development of Cardiff airport is reasonable for the local economy. But Planning seems to be systemically blind. They are clearly not engaged in joined-up thinking. If the laudable aim is to develop Cardiff Airport and there is a major artery road connecting the airport to Cardiff and the M4, that is Port Road, going immediately past the KS1 site, would be it rational behavior to introduce another 700+ cars (from the KS1 site) disgorging immediately at the "pinch-point" of the Weycock Cross roundabout? Do the planners really imagine this will help future airport development?

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6447 Comment

Document Element: Supporting the role of

Respondent: Mr Neil Jenkins [2729]

Summary:

Increased Use of Cardiff Airport – Environmental and Transport Impacts
The RLDP's support for increased activity at Cardiff Airport further undermines its environmental and sustainability claims. The plan fails to acknowledge the significant negative impacts that increased aviation activity will have on nearby communities, including St Athan, Flemingston and Eglwys Brewys. More flights and airport-related traffic will increase noise pollution, carbon emissions, and congestion on the A4226, B4265 and surrounding rural roads. The RLDP offers no credible mitigation strategy for these impacts.

Full text:

Increased Use of Cardiff Airport – Environmental and Transport Impacts
The RLDP's support for increased activity at Cardiff Airport further undermines its environmental and sustainability claims. The plan fails to acknowledge the significant negative impacts that increased aviation activity will have on nearby communities, including St Athan, Flemingston and Eglwys Brewys. More flights and airport-related traffic will increase noise pollution, carbon emissions, and congestion on the A4226, B4265 and surrounding rural roads. The RLDP offers no credible mitigation strategy for these impacts.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3h4

4574 Support

Document Element: Allowing for regeneration

Respondent: Mr David Barton [2683]

Summary:

Support on the condition that Traditional Architecture is duly supported.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

Support o the condition that TA is duly supported.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5048 Support

Document Element: Allowing for regeneration

Respondent: Mrs Wendy Hussey [3085]

Summary:

How encouraging to read about aberthaw power station. That is something to be proud of. Not a lot else is.

Full text:

How encouraging to read about aberthaw power station. That is something to be proud of. Not a lot else is.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5467 Support

Document Element: Allowing for regeneration

Respondent: Mr David Entwistle [3264]

Summary:

This is a move in a good direction but the council needs to make these areas more attractive to outside businesses and industry. At present the roading network is in poor condition in these areas and results in HGV's travelling along unsuitable, overcrowded and urban routes to access these areas. Transport links between these areas and the M4 need to be considerably improved before repurposing of these sites in order to attract high quality businesses and employers into the area once the sites are ready.

Full text:

This is a move in a good direction but the council needs to make these areas more attractive to outside businesses and industry. At present the roading network is in poor condition in these areas and results in HGV's travelling along unsuitable, overcrowded and urban routes to access these areas. Transport links between these areas and the M4 need to be considerably improved before repurposing of these sites in order to attract high quality businesses and employers into the area once the sites are ready.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5701 Support

Document Element: Allowing for regeneration

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy welcomes the RLDP Sustainable Growth Strategy's focus on regeneration of previously developed and under-utilised land, including the former Aberthaw Power Station. Safeguarding the site as a Green Energy Park presents a unique opportunity to deliver renewable and low-carbon energy projects, battery storage, a zero-carbon manufacturing cluster, and a green energy innovation centre. Complemented by a biodiverse ecology park and visitor amenities, the proposals will create highly skilled jobs, support industrial decarbonisation, and contribute significantly to climate change mitigation. The strategy and forthcoming Masterplan provide a strong framework to enable the successful regeneration of this strategically important site.

Full text:

CCR Energy welcomes the RLDP Sustainable Growth Strategy's focus on regeneration of previously developed and under-utilised land, including the former Aberthaw Power Station. Safeguarding the site as a Green Energy Park presents a unique opportunity to deliver renewable and low-carbon energy projects, battery storage, a zero-carbon manufacturing cluster, and a green energy innovation centre. Complemented by a biodiverse ecology park and visitor amenities, the proposals will create highly skilled jobs, support industrial decarbonisation, and contribute significantly to climate change mitigation. The strategy and forthcoming Masterplan provide a strong framework to enable the successful regeneration of this strategically important site.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6231 Support

Document Element: Allowing for regeneration

Respondent: Associated British Ports (Mr Will Ryan, Land & Planning Manager) [2477]

Summary:

ABP supports the general approach of this strategy, but advises that amendments should be made to the supporting text.

The Masterplan that was prepared and is referenced within this Deposit RLDP included land that is no longer to be brought forward for development by ABP. As a result, ABP will be preparing a new Masterplan that more accurately reflects the current position and the future aspirations for the Port.

The masterplanning exercise will be subject to a rigorous process and it is likely that the ambitions for the Port will be similar to those identified in the previous Masterplan, including the redevelopment of the Black Rocks Site and the promotion of the Clean Growth Hub. ABP will also continue to commit to investment in the Port facilities.
As delivered on other ABP land holdings across the UK, there is potential at the Port of Barry to create new renewable energy hubs, solar, green hydrogen production and carbon capture and storage (CCS) facilities. The reference to the suitability of green energy generation should be included.

In order to reflect the potential and opportunities at Barry more accurately, ABP proposes that paragraph 5.35 is amended to read as shown below:

5.35 In addition, Associated British Ports (ABP) will be masterplanning the Port which identifies future redevelopment opportunities on land within their ownership. This may include:
• Investment in Port infrastructure.
• Redevelopment of Black Rocks Growth Zone for potential uses such as battery supply chain, advanced manufacturing, rare earth mineral processing, next generation biofuel manufacturing, and other green energy generation and Port-related opportunities.
• The Port Clean Growth Hub focusing on zero carbon operations and manufacturing.

Full text:

ABP supports the general approach of this strategy, but advises that amendments should be made to the supporting text.

The Masterplan that was prepared and is referenced within this Deposit RLDP included land that is no longer to be brought forward for development by ABP. As a result, ABP will be preparing a new Masterplan that more accurately reflects the current position and the future aspirations for the Port.

The masterplanning exercise will be subject to a rigorous process and it is likely that the ambitions for the Port will be similar to those identified in the previous Masterplan, including the redevelopment of the Black Rocks Site and the promotion of the Clean Growth Hub. ABP will also continue to commit to investment in the Port facilities.
As delivered on other ABP land holdings across the UK, there is potential at the Port of Barry to create new renewable energy hubs, solar, green hydrogen production and carbon capture and storage (CCS) facilities. The reference to the suitability of green energy generation should be included.

In order to reflect the potential and opportunities at Barry more accurately, ABP proposes that paragraph 5.35 is amended to read as shown below:

5.35 In addition, Associated British Ports (ABP) will be masterplanning the Port which identifies future redevelopment opportunities on land within their ownership. This may include:
• Investment in Port infrastructure.
• Redevelopment of Black Rocks Growth Zone for potential uses such as battery supply chain, advanced manufacturing, rare earth mineral processing, next generation biofuel manufacturing, and other green energy generation and Port-related opportunities.
• The Port Clean Growth Hub focusing on zero carbon operations and manufacturing.

Change suggested by respondent:

Amendments to paragraph 5.35 are requested to update information on the ABP Masterplan

Sound: Not specified

Attachments: None

6804 Support

Document Element: Allowing for regeneration

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Paragraph 5.35 - Barry Docks - ABP Masterplan:

Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.

Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~)."
"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states "The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority."
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
"In November 2021, the Welsh Government's Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel."
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that "There is an existing landbank of 18.73 million tonnes of crushed rock" is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states "The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP."
The "slight surplus" referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states "The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all

constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation."
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that "The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process." This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states "the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered."
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or"
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."

MIN4 Sustainable Mineral Working.
This policy states
"Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:"
Object - This policy wording does not reflect PPW (5.11) which seeks to "promote" and not "prioritise" the use of recycled material and secondary aggregates.
Further the word "only" is superfluous and should be deleted.
Reword the policy
"Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:"

6.388 The wording states "In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction."
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states "Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34)." As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of "overprovision". Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.

Reword the text “Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

4575 Support

Document Element: Strategic Growth Area

Respondent: Mr David Barton [2683]

Summary:

Traditional Architecture has to be used to encourage its widespread application here and elsewhere as a means of attracting high quality inwards investment from the private and public sectors alike.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

TA has to be used to encourage its widespread application here and elsewhere as a means of attracting high quality inwards investment from the private and public sectors alike.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4666 Object

Document Element: Strategic Growth Area

Respondent: Mr Tim Griffiths [2578]

Summary:

Certain areas are already full to bursting and growth is virtually impossible

Full text:

Certain areas are already full to bursting and growth is virtually impossible

Change suggested by respondent:

Have Local planners who live in the area so the problems are more understood

Sound: No

Attachments: None

4667 Object

Document Element: Strategic Growth Area

Respondent: Mr Tim Griffiths [2578]

Summary:

Growth can only be achieved sensibly and not half thought through. At the moment it seems too much is being crammed into an area which cannot cope

Full text:

Growth can only be achieved sensibly and not half thought through. At the moment it seems too much is being crammed into an area which cannot cope

Change suggested by respondent:

.

Sound: No

Attachments: None

5049 Comment

Document Element: Strategic Growth Area

Respondent: Mrs Wendy Hussey [3085]

Summary:

Sustainable growth covers a lot of ground. Can planners manage to put bus hubs, if they are going to be built in a place that is central to users. Transport links really are shrinking.

Full text:

Sustainable growth covers a lot of ground. Can planners manage to put bus hubs, if they are going to be built in a place that is central to users. Transport links really are shrinking. Why cant

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6537 Object

Document Element: Strategic Growth Area

Respondent: Barry & Vale Friends of the Earth [708]

Agent: Barry & Vale Friends of the Earth

Summary:

- Strategic Growth Area: Focuses on settlements with good transport links to reduce car dependency.

You say this but Rhoose to St Athan fail it
- Rhoose: Key site for 339 homes north of the railway and employment development, including land east of Cardiff Airport (16.3 ha) and south of Port Road (44.75 ha).
- St Athan & Llantwit Major: Targeted for residential development, including 235 units near Eglwys Brewis Road and 105 units at St Athan Road., Clive Rd 51, Church Farm 500, west of St Athan 600
-
- Can't be called "good transport" without the railway – more frequent than hourly and with stations at Eglwys Brewis and St Athan. The 304 bus taking over an hour to Cardiff isn't "good". road transport is caught in snarl-ups at Weycock Cross and Culverhouse Cross.
- Single access key sites and others over 100 homes are not deliverable

Full text:

- Essential that viability information is provided for all Candidate Sites
- We do not find this reuirement has been met for All sites
- 3.44 PPW sets out the policy …housing delivery in the development plan process. A key element of this is ensuring financial viability is assessed at the candidate site stage. The site promoter (LPA, land owner and/or developer) must carry out an initial site viability assessment and provide evidence that sites can be delivered. As required by national policy, all candidate sites are subject to a viability assessment.

- Strategic Growth Area: Focuses on settlements with good transport links to reduce car dependency.

You say this but Rhoose to St Athan fail it
- Rhoose: Key site for 339 homes north of the railway and employment development, including land east of Cardiff Airport (16.3 ha) and south of Port Road (44.75 ha).
- St Athan & Llantwit Major: Targeted for residential development, including 235 units near Eglwys Brewis Road and 105 units at St Athan Road., Clive Rd 51, Church Farm 500, west of St Athan 600
-
- Can't be called "good transport" without the railway – more frequent than hourly and with stations at Eglwys Brewis and St Athan. The 304 bus taking over an hour to Cardiff isn't "good". road transport is caught in snarl-ups at Weycock Cross and Culverhouse Cross.
- Single access key sites and others over 100 homes are not deliverable

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/38m

5412 Object

Document Element: Key Diagram

Respondent: Emma Reed [2653]

Summary:

The bus routes for Rhoose need checking - there is only one proper bus an hour as a bus the 905 which travels a mile is hardly a proper bus route. The active travel route is very expensive nad has land ownership problems between rhoose and barry. Can it really be implemented in the plan period?

Full text:

The bus routes for Rhoose need checking - there is only one proper bus an hour as a bus the 905 which travels a mile is hardly a proper bus route. The active travel route is very expensive nad has land ownership problems between rhoose and barry. Can it really be implemented in the plan period?

Change suggested by respondent:

Revisit the transport listed on the diagram for rhoose for transport infrastructure ensuring it is correct and deliverable,

Sound: No

Attachments: None

CONSULTATION PROCESS

4848 Object

Document Element: What Will Happen After the Consultation?

Respondent: Ian C Davies [2987]

Summary:

Reading the Overview and Timescale I am prompted to make the following comments.
1. The Adoption of the RLDP is set for September 2027. The Plan cannot therefore represent the period 2021 to 2036.
2. I find it difficult to comprehend that this Plan will be relevant for only 9 years after which the tax payers of The Vale will have to fund another RLDP. This can hardly be called planning.
3. It beggars belief that the RLDP is helping to ‘‘decide what developments will and will not be permitted at different locations and highlight areas that we need to protect.’’ What on earth does the current LDP do if it does not decide what developments will and will not be permitted at different locations and highlight areas that we need to protect?

Will those development applications which are currently pending, for one reason or another, now be delayed beyond September 2027?

Full text:

Dear LDP officer
Today it came to my attention that The vale Council has officially launched the consultation on the Deposit Replacement Local Development Plan (RLDP) which covers the period 2021-2036. Below you will find an extract of one of the numerous documents that have been made available to the public for comment.

(Image taken from the Council's website - 'Overview and Timescale')

Reading the Overview and Timescale I am prompted to make the following comments.
1 The Adoption of the RLDP is set for September 2027. The Plan cannot therefore represent the period 2021 to 2036.
2 I find it difficult to comprehend that this Plan will be relevant for only 9 years after which the tax payers of The Vale will have to fund another RLDP. This can hardly be called planning.
3 It beggars belief that the RLDP is helping to ‘‘decide what developments will and will not be permitted at different locations and highlight areas that we need to protect.’’ What on earth does the current LDP do if it does not decide what developments will and will not be permitted at different locations and highlight areas that we need to protect?
Will those development applications which are currently pending, for one reason or another, now be delayed beyond September 2027?

Yours faithfully,

Ian C Davies

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/sk5

5052 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mr Shayne Wilford [2132]

Summary:

It is very very difficult for us, to navigate and comment on potentially 1000's pages of information with only 100 words per paragraph. We will persevere but, using this as an example, we are unclear of what we're commenting on. The paragraph above I assume? The process also assumes access and knowledge of computers an online representations. Older and more vulnerable residents will not have the opportunity to comment this way and will likely therefore to be not represented.
We need clarity on what we are commenting on. This is the first comment box and it's already confusing. The Authority needs to reconsider how it presents this information, making it less confusing and accessible to all, including those without access to online portals etc.

Full text:

It is very very difficult for us, to navigate and comment on potentially 1000's pages of information with only 100 words per paragraph. We will persevere but, using this as an example, we are unclear of what we're commenting on. The paragraph above I assume? The process also assumes access and knowledge of computers an online representations. Older and more vulnerable residents will not have the opportunity to comment this way and will likely therefore to be not represented.

Change suggested by respondent:

-

Sound: No

Attachments: None

5074 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mr Stephen Vaughan [3060]

Summary:

Despite living in close proximity to a development site, I had to hear by word of mouth. This is not acceptable.
I believe they should tell not only all residents in Barry, but all residents in the Vale. Telling only the homes that are adjacent to the field is not good enough.
The other issue I tried to utilise the web site to put my objections across and I found that the information was bloated out with rubbish and too little facts. This was done to put people of reading. We need information backed up with fact not data and bloat.
When responding we are restricted to very few words, so we have no option but to be concise (One rule for one, another for others). The web site is off putting (maybe deliberately so). I did put my objection, but not convinced it worked at all.

Full text:

A couple of other concerns are that I live only 500 m from this development site, yet the Vale of Glamorgan chose to include telling me about this development. I had to hear by word of mouth. This is not acceptable.

I believe they should tell not only all residents in Barry, but all residents in the Vale. Telling only the homes that are adjacent to the field is not good enough. This development will have a long negative effect on the quality of life for all in the Vale.

The other issue I tried to utilise the web site to put my objections across and I found that the information was bloated out with rubbish, there is too little facts and too much. This was done to put people of reading. We need information backed up with fact not data and bloat.

When responding we are restricted to very few words, so we have no option but to be concise (One rule for one, another for others). The web site is off putting (maybe deliberately so) I did put my objection, but not convinced it worked at all.

How can councillors who have turned down smaller developments twice on this site before turn coat and vote for it, when the situation has only got worse.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

5164 Object

Document Element: What Will Happen After the Consultation?

Respondent: Miss Miranda Davis [3131]

Summary:

On the public consultation: - As Rhoose, St. Athan and Dinas Powys are the affected settlements, the documentation should have been made available in their community run libraries. The council officers present at the public consultation meetings were not well enough briefed to answer the questions raised and could therefore only serve as a sounding board for the frustrations expressed.

Full text:

1) On the public consultation: - As Rhoose, St. Athan and Dinas Powys are the affected settlements, the documentation should have been made available in their community run libraries. The council officers present at the public consultation meetings were not well enough briefed to answer the questions raised and could therefore only serve as a sounding board for the frustrations expressed.

2) The proposed development of 520 properties in Readers Way should not be considered in isolation. This development along with the development of 339 properties already approved in Rhoose, on land north of the railway line (east) HG1 (9), plus the proposals for 376 properties at N.W. Barry (KS1) and a further 1132 in St. Athan (KS4 and KS5) totals 2367 new dwellings. This will have a significant impact on the local residents in the pressure it will put upon the existing highway infrastructure and facilities available.

3) The highway infrastructure will be put under further strain due to the need for students to travel to the Cardiff and Vale College currently under construction next to the airport. In addition, the future development of the proposed Energy Park at Aberthaw and ongoing development of the St. Athan Enterprise zone and Cardiff Airport Business Park, along with the potential development at Model Farm will also add to the number of vehicles. Initial construction traffic will be followed by commuting traffic as employees travel to these places of work.

4) The A4226 Port Road forms the main route between St. Athan, Rhoose and Barry. The surrounding country lanes are not capable of absorbing the additional pressure and are not well maintained. Delays which already occur in the vicinity of Waycock Cross roundabout will only become more frequent. Options to improve this junction are clearly limited meaning that it will remain a bottle neck.

5) The proposals rely heavily on the concept of a public transport infrastructure replacing the use of private vehicles and thereby easing the pressure on the highways. This public transport infrastructure is however not in place, with both the train and bus services only operating on an hourly basis. It is clear that there is no guarantee that the train service, which is under the control of Transport for Wales (T.F.W), will be made more frequent in the future. Likewise, the provision of land at St. Athan for a possible new station could end up being a white elephant unless T.F.W. commit to both providing a new station and increasing the frequency of trains. An hourly service acts as a real disincentive to people using public transport as using your own vehicle provides far more flexibility.

6) Active Travel is also being promoted both within the Readers Way development and in the surrounding area. It is clear that the active travel routes both in Rhoose, to Lower Porthkerry and elsewhere, are underutilised. Walking or cycling to places does not fit in with the lives that people are living as time is precious. It is questionable as to how many people will opt to walk or cycle the distance into the centre of the village/town to access the local facilities rather than using their cars to either shop in Rhoose or at the supermarkets in Barry. Many working parentstaking their children to and from school will not have time to make a return journey and neither will people want to be carrying shopping over that distance. As such, further pressure will be put on the only main route through Rhoose ie. Rhoose/ Fontygary Road with on street parking already causing issues especially around school opening and closing times. Ironically this development will provide another route through Rhoose, but with residences all around has been designed to stop it being used as such.

7) It is wrong that Rhoose is expected to have an ever-expanding population without an infrastructure to cater for it. Three branch Doctor surgeries mean that doctor appointments often have to be obtained elsewhere. The library relies on volunteers and fund raising to remain open having had its council funding withdrawn. Rwys Primary will require further expansion to cater for the increase numbers and more pupils will have to take buses to their secondary education elsewhere.

8) Rhoose is hemmed in by the airport and sea and with an expanding quarry encroaching to the west of Fonmon Road. As such the maintenance of its green spaces is important for both the physical and mental wellbeing of its residents. Readers Way as with the other proposed developments are on greenfield sites. If the development goes ahead. the layout of the site should aim to maximise the retention of the existing trees and hedgerows both during and after development. There should be a requirement that any planted trees are maintained and replaced by the developer if they do not survive over a ten-year period. No consideration appears to have been given to planting trees around the edge of the development, which would both reduce its impact on the neighbouring properties and increase the tree cover in an area known for its lack of trees, hence why the group Rhoose Replant have been working to counter this. The public open space should be used to provide biodiversity mitigation and also to enhance it. A wildlife corridor should be provided linking the new public open space with the area around the existing pond and a second pond should be provided to increase the possibility of the newts returning.

9) It is important that plans for the public open space are delivered. The allotments appear to have replaced an earlier

proposed community orchard or garden. How would these be managed? No pond is shown. The sports provision appears to consist of three pitches. Who would maintain and use them especially as there is already this provision at Ceri Road along with a club house building. Overall, the plans are unimaginative especially in light of the s106 funding that should be available as a result of the development which could be invested in the area

10) I question why the Vale of Glamorgan Council is choosing this option whilst ruling out developing a new town at Llandow, even though this could be built as fit for purpose. No consideration either seems to have been given to expanding Penarth, Cowbridge or Llantwit Major and other areas of Barry, all of which have the infrastructure to support a growing population. The inhabitants of these places are benefiting from the engagement offered by the placemaking initiative programme. Rhoose is excluded from this and yet is expected to take more than its fair share of housing with little to show for it.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

3131 Davis Rhoose (5110)_Redacted.pdf - https://valeofglamorgan.oc2.uk/a/syr

5215 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mr Darryn Cross [2549]

Summary:

No where near enough time to read through all these documents and this process to object has seemingly been made very difficult and confusing for people who want to object.

Full text:

No where near enough time to read through all these documents and this process to object has seemingly been made very difficult and confusing for people who want to object.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5224 Object

Document Element: What Will Happen After the Consultation?

Respondent: Miss Rachel Ward [3108]

Summary:

Trying to make a representation is actually quite difficult. There really should be a big button which makes it obvious where you can submit your views. I spent 10 minutes clicking in circles until I realised what to do and I'm pretty proficient with tech.
Additionally, the number of documents and associated index's is quite off putting. It feels like the council are purposefully putting barriers in the way of people wanting to object. I understand the necessity for transparency but there should be a layman's version for normal people to be able to read through in a reasonable timeframe. I estimate it would take a full day to read every word of the associated documents and I know I don't have that sort of time.

Full text:

Re the planning proposal for waycock cross

Firstly can you feed back to the council that trying to make a representation is actually quite difficult. There really ahould be a big button which makes it obvious where you can submit your views. I spent 10 minutes clicking in circles until I realised what to do and I'm pretty proficient with tech.
Additionally, the number of documents and associated index's is quite off putting. It feels like the council are purposefully putting barriers in the way of people wanting to object. I understand the necessity for transparency but there should be a layman's version for normal people to be able to read through in a reasonable timeframe. I estimate would take a full day to read every word of the associated documents and I know I don't have that sort of time. Thank you for passing my comments on the relevant departments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

5309 Object

Document Element: What Will Happen After the Consultation?

Respondent: Professor Andrew Vincent [920]

Summary:

First, the overall online presentation of the RLDP is utterly chaotic, confusing and way overlong. There is NO clear organization of the material and there are multiple cross-cutting documents making it painful to navigate. Documentary material for the KS1 site, for example, appears in multiple locations, needing the reader to consult other areas of the byzantine site to give meaningful responses. It looks overall like a mass dump of documents, with no regard for readership. Second, it takes NO regard whatever for digital poverty, it is thus discriminatory and offends basic principles of natural justice and fairness.

Full text:

First, the overall online presentation of the RLDP is utterly chaotic, confusing and way overlong. There is NO clear organization of the material and there are multiple cross-cutting documents making it painful to navigate. Documentary material for the KS1 site, for example, appears in multiple locations, needing the reader to consult other areas of the byzantine site to give meaningful responses. It looks overall like a mass dump of documents, with no regard for readership. Second, it takes NO regard whatever for digital poverty, it is thus discriminatory and offends basic principles of natural justice and fairness.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5543 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mrs Mary Vincent [2657]

Summary:

I learned that decisions about site use occurred before residents were informed. The Weycock Cross development was first mentioned in July 2025, during a poorly conducted consultation. Later, a vote on the NW Barry site was held, with objections dismissed quickly. A formal consultation on the RDLP involved online responses referencing complex, confusing documents, which was unfair and inaccessible for many residents. The process relied on questionable data, lacked transparency, and was not a genuine democratic consultation.

Full text:

It would seem that decisions were being taken on the use of sites well before affected residents were even aware of them. The first I heard of the proposed rehash of the development at Weycock Cross (refused in 2015) was in July 2025, when we were invited to a consultation at Millwood Bowling Club. This was more of a show-and-tell than a consultation. No one took down our comments. Didn't they count? The next we heard was that there would be a vote in December to decide whether the NW Barry site should be removed or included. Some members of my family attended and were give three minutes to state their objections. I watched online and say how these objections were summarily dismissed by a planning officer. Then came the vote. Neck and neck, but passed through. Key councillors did not vote. Next was a 'consultation on the RDLP' in Memorial Hall, Barry. Here we were informed of how we could 'have our say' on the proposed developments, by stating our responses to the proposals through an online portal, which would have reports of all the detailed investigations into viability and suitability of their 'mitigation packages' to offset the objections. These would be found in the supporting documents. In order for our responses to be valid, they had to reference these documents. These turned out to be vast in number, packed with confusing and often contradictory details. This was the detail we were told we had to reply to. This process was grossly unfair in that the majority of residents would not have the digital skills to navigate the way through them. This is neither fair nor transparent. Those that were better able to trawl through the huge megabites of scattered and hidden graphs and reports found that the evidence was very thin and far from trustworthy, with many inner contradictions, inaccuracies and false conclusions. From this unreliable and unscientific data 'evidence' had been extrapolated and decisions made. This is neither transparent nor honest.

It is not democratic consultation.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5630 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mrs Katie West [3321]

Summary:

Unnecessary

Full text:

Unnecessary

Change suggested by respondent:

-

Sound: No

Attachments: None

5550 Object

Document Element: What Will Happen After the Consultation?

Respondent: Professor Andrew Vincent [920]

Summary:

The initial consultation on higher-level strategy was limited, with most NW Barry residents unaware of developments. Objections were largely ignored, and a "Preferred Strategy" was endorsed without available site-specific technical assessments. Residents were told to wait for details, but no targeted community engagement or co-design sessions occurred. The February 2026 in-person consultation was dismissive, with no recording of comments or responses, merely directing residents online. Overall, planning actions appeared reactive, with little meaningful engagement or consideration of community input.

Full text:

The initial consultation, which focused on higher level strategy, was singularly limited. The large majority of residents in NW Barry were not even aware of any developments. Subsequently, we understand that some who knew of the consultation did register objections. These objections seemed to have been ignored and a "Preferred Strategy" was endorsed by full Counsel. As far far as we can ascertain, ex post facto, there were no site specific technical assessments available. Initial consultation occurred before key technical evidence was available on the sites. In relation to NW Barry, residents were told (in reply to questions) in June/July 2025 to "wait" for details (in a public meeting in Millwood Bowls club). This was the first occasion that we had heard of developments. Vale Planning and Council appear to have made final decisions about sites after this, however the public were not consulted at all. Barry is clearly expected to take substantial growth, but there is no record of targeted community engagement specific to Barry. Heavy reliance was placed on written representations. There was no evidence of community or stakeholder workshops and no co-design sessions. When we attended the in-person consultation event in Barry Memorial Hall in February 2026, there was no one to record our comments, no answers were given any queries and we were constantly told to go and look at the online consultation portal to get information and submit our concerns. The in-person event was simply a "signposting portal" to the online RLDP. There was no meaningful engagement. The public were simply asked to react to a pre-determined sites. Planning's subsequent behaviour has largely been negative and reactive to any suggested changes.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5696 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mrs Mary Vincent [2657]

Summary:

'The local community are involved in the development of proposals... Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality. These engagement sessions are considered to assist in fulfilling this Charter'
My experience of these 'engagements' does not match the stated aims. I felt far from 'equal', more an irritation in the way of the council's justification of its intentions. The sheer difficulty of navigating this labyrinthine 'consultation' has felt like abuse. No council should treat its residents this way.

Full text:

'The local community are involved in the development of proposals... Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality. These engagement sessions are considered to assist in fulfilling this Charter'

My experience of these 'engagements' does not match the stated aims. I felt far from 'equal', more an irritation in the way of the council's justification of its intentions. The sheer difficulty of navigating this labrynthine 'consultation' has felt like abuse . I'm over 80. No council should treat its residents this way.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5758 Object

Document Element: What Will Happen After the Consultation?
Respondent: Mr Phillip Davies [3354]
Summary:
5) Website very hard to access 6) No Welsh language option for Welsh speakers
Full text:
5) Website very hard to access 6) No Welsh language option for Welsh speakers
Change suggested by respondent:
-
Sound: Not specified
Attachments:
Paper Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t5h

5773 Object

Document Element: What Will Happen After the Consultation?
Respondent: Mrs Sarah Jane Davies [3362]
Summary:
4) Website- very hard to access no Welsh language options for Welsh speakers
Full text:
4) Website- very hard to access no Welsh language options for Welsh speakers
Change suggested by respondent:
-
Sound: Not specified
Attachments:
Paper Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t6t

5877 Object

Document Element: What Will Happen After the Consultation?
Respondent: Mrs Rebekah Vincent-Newson [2668]
Summary:
I object to the RLDP consultation process, citing structural weaknesses, omissions, and procedural gaps that undermine its legitimacy. The consultation was poorly designed, difficult to access, and overly complex, limiting meaningful participation. It focused only on high-level strategy without detailed site assessments or engagement with affected landowners and communities, especially in Barry. Public objections were not meaningfully incorporated, and technical information was unavailable early on. The process was reactive, not inclusive, with limited opportunities for community input, particularly in Barry, and relied solely on written submissions.
Full text:
Objection re: RLDP Consultation process
I am raising a general objection to the way in which the consultation process has been carried out and am basing my comments on personal experience since July 2025 and a review of the 'Housing Growth in Barry – Report of Public Consultation' document. I believe there are structural weaknesses, omissions, and procedural gaps that undermine the robustness and inclusivity of the consultation and question its legitimacy.
In broad terms, the consultation process surrounding the proposed developments raises significant concerns about accessibility and fairness. The consultation feedback form was diAicult to locate and use, being hidden via multiple web pages rather than clearly signposted. The consultation portal itself was poorly designed, being overly complicated and unnecessarily layered. The sheer volume of documentation across the site created unnecessary obstacles for residents who wanted to take part. Under the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, planning authorities have a clear duty to ensure that consultation arrangements are accessible and enable meaningful engagement from the community.
Planning Policy Wales sets out firm expectations that public participation must be transparent, inclusive, and straightforward, ensuring that all individuals are able to contribute to the planning process without undue diAiculty.
When consultation tools are poorly designed, or overly complicated or burdensome, as they were in this consultation, this calls into question the credibility and legitimacy of

the consultation exercise.
Consultation limited to the Preferred Strategy stage (not site-specific consultation)
The consultation undertaken (Dec 2023–Feb 2024) focused on high-level strategy, not detailed impacts on specific sites such as NE Barry or alternative sites. The report itself states the exercise was on the Preferred Strategy, which "identifies how much sustainable growth is needed and where this growth will broadly be located."
Gap: Residents were not consulted on the detailed implications of individual sites (e.g., infrastructure capacity, environmental constraints, transport, drainage), limiting the ability of the public to make informed representations early in the process.
No evidence of direct engagement with a ected landowners or communities for the largest site
The report acknowledges major deliverability issues with the largest key site (North East Barry), including inability to secure landowner agreement across the fragmented landholdings. "An agreement could not be secured with all relevant landowners."
Gap: The Council relied on promoters' claims rather than conducting independent landowner engagement or reviewing deliverability before public consultation. As a result, the public were consulted on a strategic option that was later abandoned.
Preferred Strategy proceeded despite strong objections and unresolved issues
There were "objections to each of the key sites" during the public consultation, yet the Preferred Strategy was endorsed unchanged by Full Council on 30 Sept 2024.
Gap: There is no evidence that objections were meaningfully incorporated before endorsing the Strategy. This suggests the consultation informed the Council but did not shape the outcome.
Lack of site-specific technical assessments available at early consultation stage and at this later stage
Much of the consultation occurred before key technical evidence was available, including:
o Viability
o Deliverability
o Ownership constraints
o Infrastructure and transport assessments
o Environmental constraints (SSSI proximity, flood risk, etc.)
The report explicitly states that the viability and deliverability of sites (including the 900-unit NE Barry site) were still being assessed after the consultation.
In relation to North West Barry and from mid-July 2025, I requested to speak to Place Scrutiny Committee and gave my views. At that meeting, and at a subsequent full council meeting that I observed, residents like me and councillors who were challenging the Planning Team were told to wait and that detail would be available at the later consultation stage, via public meetings and the consultation portal. However, either this detail was not made available because it doesn't exist or else was it is buried in thousands of pages of documents that we have been given 6 weeks sift through in order to find out what is relevant.
Gap: The public were expected to comment without access to essential technical information, undermining the quality of feedback and the transparency of the process. This is still the case now, whereby after reading as much of the key information as possible, there are still huge gaps in basic information that help residents make an informed decision.
Consultation did not explore alternative growth locations until later
The public was shown only the five original key housing-led sites, even though at least one (NE Barry) was already facing deliverability challenges. Only after public consultation did the Council begin considering alternative options.
Gap: The public were not consulted on alternative or fallback options, limiting their ability to compare spatial choices or suggest more acceptable solutions.
Evidence of restricted consultation scope for the Barry community
The report notes that Barry is expected to take substantial growth but there is no record of targeted community engagement specific to Barry - the largest and most aAected settlement.
Gap: No tailored engagement with Barry residents or community groups was undertaken, despite the disproportionate scale of proposed development for Barry.
Limited clarity on how comments influenced later site selection
Although an "Initial Consultation Report" was prepared, the process described is top-down:
o Consultation → summary → Preferred Strategy endorsed without change
o Only later did site feasibility issues force adjustments
Gap: A lack of transparency exists regarding how community feedback shaped decisions. Changes to the strategy arose from landownership/deliverability - not from public concerns.
Heavy reliance on written representations

My own experience and the Consultation report provided no evidence of:
o community workshops
o stakeholder panels
o co-design sessions
o facilitated deliberation
o youth engagement
o hard-to-reach community engagement
o ‘what does this mean for my area?’ summaries or similar
The process seemed to rely solely on written submissions. When we attended the in person consultation event in Barry Memorial Hall in February 2026, there was no one to record our comments, we were given no answers to our queries and concerns, and we were constantly told to go and look at the consultation portal to get information and submit our concerns. The in-person event was simply a ‘signposting to the consultation portal’ event. It was not meaningful engagement and cannot legitimately be called a consultation event.
Gap: This method excludes those less able to engage through formal written consultation, reducing representativeness.
No community engagement prior to selecting the original five “key sites”
The five major sites (incl. North East Barry) were selected before consultation.
The report states: “As part of the Preferred Strategy, 5 new key housing-led sites were identified…”
Gap: The public were not involved in early spatial option development; instead, they were asked to react to a pre-determined set of locations.
Reactive, not proactive, approach to community concerns
The document describes a process where council decisions (such as dropping the NE Barry site) follow behind-the-scenes technical negotiation rather than public influence.
The public consultation did not trigger the change - the failure of landowner agreement did.
Gap: Public sentiment had little demonstrable impact on spatial strategy development.
The consultation was not inclusive, was discriminatory and fundamentally flawed. I wish for this to be included as part of my objection.

Change suggested by respondent:

NA

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h7

5923 Object

Document Element: What Will Happen After the Consultation?

Respondent: Emma Reed [2653]

Summary:

Only the Council run libraries received copies of the deposit plan documents and not the community libraries where most of the allocated development sites are - ie Rhoose Dinas Powys and St Athan.
Only one short session to discuss with officers the plans was held and the plan for Rhoose was wrong misleading the public into the likely way the development would proceed.
A further session with officers was asked for but was refused.
The Plan is overcomplicated and not all sections in the plan can be commented on with word restrictions on each Policy.

Full text:

Only the Council run libraries received copies of the deposit plan documents and not the community libraries where most of the allocated development sites are - ie Rhoose Dinas Powys and St Athan.

Only one short session to discuss with officers the plans was held and the plan for Rhoose was wrong misleading the public into the likely way the development would proceed.

A further session with officers was asked for but was refused,

The Plan is overcomplicated and not all sections in the plan can be commented on with word restrictions on each Policy.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/t97

5944 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mr Ross Cleland [3430]

Summary:

Key Documents Unavailable in Welsh Online

Full text:

I object to the proposed development at Weycock Cross for the below reasons:
1) Transport Sustainability
- Congestion already exists in North West Barry, with planning provisions + mitigations extremely weak
2) Local Education Capacity needs
- There is no provision for the expansion in school places in the plan, when existing schools are already struggling.
3) Green Wedge
- The proposal is in contravention of the 2015 inspector report finding the site essential to the green wedge openness.
4) Healthcare Provision
-Healthcare infrastructure is already weak, no provision are in the RLDP to mitigate this.

Key Documents Unavailable in Welsh Online

Change suggested by respondent:

-

Sound: Not specified

Attachments:

3430 R Cleland Barry (5936)_Redacted.pdf - https://valeofglamorgan.oc2.uk/a/t9z

5978 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mrs Debra Cleland [2639]

Summary:

Some of the important documents on the website are only in English.

Full text:

1) Loss of green wedge. Green Wedge should not be a moveable commodity to suit council policy.
2) Flooding-Weycock Cross roundabout constantly floods. The field in question also has flooding issues. There is no mitigation in the current RLDP.
3)Mitigation-This does not work, look at Culverhouse Cross.
4) Further development-Another 1600 houses prosed for Rhoose putting pressure on the main arterial route into Rhoose (at the Waycock cross roundabout)
5) Lack of public transport in the area. Doctors surgeries are over subscribed, along with schools and dentists etc.
6) Over capacity on Port Road. The road from the proposed site (onto port road) was built for approx 2,000 vehicles. The council carried out their own survey a number of years ago and it was found that over 24,000 cars were using the route.
7) The site is outside the Urban Boundary
8) Nant Talwg Way pumping station regularly breaks down + this after the supposed upgrade.
9) Loss of Agricultural Land

Some of the important documents on the website are only in English.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Paper Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tvj

6106 Object

Document Element: What Will Happen After the Consultation?

Respondent: Miss Julia Thompson [2631]

Summary:

The sheer volume and inaccessibility of information held on the web pages in relation to this "consultation" makes the consultation period unsuitable and does not allow residents time for review let alone be able to provide a robust case for consideration.

Full text:

The sheer volume and inaccessibility of information held on the web pages in relation to this "consultation" makes the consultation period unsuitable and does not allow residents time for review let alone be able to provide a robust case for consideration.

Change suggested by respondent:

Either a further consultation or extended consultation period to allow for thorough review of all documents.

Sound: No

Attachments: None

6286 Object

Document Element: What Will Happen After the Consultation?

Respondent: Ms Lynne Squires [3520]

Summary:

In my view, the RLDP is not fully justified or effective in its current form with respect to plan-making and the evidence base. Key gaps include accessibility and transparency of evidence, consideration of resident and stakeholder feedback, and robust monitoring and review arrangements.
Without clear and accessible evidence, demonstrated consideration of local feedback, and robust monitoring and review mechanisms, residents cannot be confident that the Plan will be fair, effective, or responsive to changing circumstances.

Clarity, Transparency, and Accessibility of Evidence
The RLDP is not always clear and is not easy to access.
Technical reports, data, and assumptions are often difficult to find or understand, making it hard for residents to see why particular sites or policies were chosen.
The Council should provide accessible summaries and clear explanations so that everyone can understand and comment on the evidence.

Local Consultation and Consideration of Resident Feedback
I am concerned that residents' views may not have been fully taken into account in shaping the Plan.
It is unclear how consultation responses have influenced allocation decisions or policy wording.
I seek assurance that feedback from local people and community groups has genuinely informed the Plan, and that future consultations will be inclusive and clearly reported.

Full text:

1. Air Quality and Traffic
The RLDP has not been supported by a sufficiently robust, transparent and locally specific
evidence base in relation to traffic capacity, mitigation, air quality and sustainable transport delivery in Dinas Powys.
The Plan relies on high-level assumptions rather than detailed assessments of known local constraints, and it does not provide adequate certainty that necessary mitigation and sustainable transport measures will be delivered, funded and implemented in a timely manner.
As a result, there is a significant risk that the cumulative impacts of development will lead to increased congestion, adverse effects on air quality and a deterioration in the quality of life for existing and future residents.
Until these evidence gaps are addressed and clear, enforceable measures are put in place, the RLDP cannot be considered fully justified, effective or consistent with national policy in its application to Dinas Powys.
Traffic Capacity
I am concerned that the RLDP has not demonstrated that the existing road network in Dinas Powys can cope with the scale of development proposed. Roads and junctions within the village already experience significant congestion both at peak times and throughout the day, particularly along Cardiff Road, St Andrew's Road and the A4055.
The Plan does not provide clear or accessible evidence, such as detailed junction capacity assessments or peak-hour traffic modelling, to show that additional development will not worsen these problems. Without this information, I cannot be confident that growth can be accommodated without unacceptable impacts on daily travel, safety and quality of life.
Questions: Can the Council confirm that the existing highway network in Dinas Powys can accommodate the growth proposed in the RLDP without causing unacceptable congestion?
Can the Council provide evidence including junction capacity assessments and peak hour traffic modelling?
Mitigation Measures
Where development in Dinas Powys is likely to increase traffic, I am concerned that the RLDP does not clearly explain how congestion will be mitigated.
Mitigation measures are described in general terms, but there is little clarity on what will actually be delivered, when it will happen, or who will pay for it. There is also no clear reassurance that mitigation will be in place before development takes place.
I am concerned that traffic conditions could deteriorate further if development proceeds without effective safeguards.
Questions: For any development allocations in Dinas Powys that may impact congestion, what measures are proposed to mitigate these effects?
Are these measures fully funded, deliverable, and enforceable?
Air Quality Impacts
Increased traffic has clear implications for local air quality, particularly in residential areas and near schools and community facilities. I am concerned that the RLDP has not clearly assessed how the proposed growth in Dinas Powys will affect air quality, especially when the cumulative impact of multiple developments is considered.
The Plan does not explain how compliance with statutory air quality standards will be monitored or maintained as traffic levels increase. This creates significant uncertainty about potential impacts on public health and the local environment.
Questions: Has the Council assessed the likely impact of the proposed growth on local air quality in Dinas Powys, including cumulative effects?
How will the Plan ensure compliance with statutory air quality standards?
Sustainable Transport
While the RLDP refers to encouraging walking, cycling and public transport, I am not convinced that realistic alternatives to car/motor use will be delivered in Dinas Powys.
There is limited detail on specific improvements, timescales or funding for sustainable transport. Without frequent, reliable public transport and safe, direct walking and cycling routes, it is unlikely that car use will reduce in practice.
As a result, traffic growth and air quality impacts may be greater than the Plan assumes.
Question: How does the Plan/Council intend to ensure that sustainable travel options (walking, cycling, public transport) will be delivered and used to reduce traffic and air quality impacts in Dinas Powys?
Evidence Gaps

Overall, I am concerned that key evidence relating to traffic and air quality in Dinas Powys is either missing or insufficiently detailed. Without clear, locally specific assessments, it is difficult to understand how the Council can be confident that the Plan is sound or that its impacts on the community are acceptable.
Question: There are limitations in the transport and air quality evidence for Dinas Powys, how does the Council justify that the RLDP remains sound in light of these uncertainties?
2. Flood risk
I am concerned about the Replacement Local Development Plan (RLDP) and its impact on Dinas Powys, in relation to flood risk.
Dinas Powys already experiences surface water flooding, overloaded drains and pressure on local watercourses. Any new development must be proven to be safe and must not make these problems worse. At present, the RLDP does not give me confidence that this has been properly addressed.
Flood Risk Has Not Been Properly Resolved
Welsh Government policy (TAN 15) says new development must be safe from flooding for its lifetime and that flood risk should be dealt with when the Plan is written, not later on.
The RLDP appears to allocate sites that are affected by flood risk without clearly showing how they can be made safe. Instead, it relies on the idea that solutions will be worked out later when planning applications are submitted. As a resident, this is worrying, as there is no guarantee that those solutions will ever work or be delivered.
Questions: Can the Council explain how allocations within [or affecting] TAN 15 flood risk areas comply with TAN 15's requirement that development be flood-safe for its lifetime, rather than relying on mitigation to be designed later?
Where the Plan relies on mitigation to address flood risk, what evidence demonstrates that such mitigation is deliverable, funded, and capable of implementation within the Plan period?
Is it the Council's position that compliance with TAN 15 can be deferred to the planning application stage, and if so, how does that align with the requirement for strategic flood risk to be resolved at plan-making stage?
Lack of Clear Evidence Behind Flood Assessments
The flood studies supporting the Plan are not easy for a lay person to understand and do not clearly show that the full impact of new development has been properly assessed.
In particular, it is unclear whether:
• The combined effect of multiple new developments has been considered
• The worst-case impacts of climate change and heavier rainfall have been tested
• Flood risk to existing homes and streets has been fully taken into account
Without this information, it is hard to see how the Council can be confident that new development will not increase flooding in Dinas Powys.
Questions: What level of modelling underpins the SFCA, and can the Council confirm whether it assesses downstream and off-site impacts arising from cumulative
development?
Does the SFCA test a 'worst-case' climate change scenario consistent with current Welsh Government guidance, and if not, why not?
How does the SFCA move beyond a desktop exercise to demonstrate that individual allocations are genuinely developable without increasing flood risk elsewhere?
Too Much Reliance on Future Drainage Solutions
The Plan relies heavily on Sustainable Drainage Systems (SuDS) to manage surface water, but there is little evidence showing that these systems can realistically work on all proposed sites.
I am concerned that:
• There may not be enough space on sites for effective drainage
• Water will still end up flowing into already stretched drains and streams
• Long-term maintenance of drainage systems is unclear
If these systems fail or are not properly maintained, flooding problems could become worse over time.
Questions: What evidence does the Plan rely on to show that SuDS can be accommodated on all relevant allocations without loss of developable area or displacement of flood risk?
Has the capacity of receiving watercourses and drainage networks been assessed at a strategic level, or is this assumed to be resolved site-by-site?
How does the Plan address the cumulative impact of multiple SuDS systems discharging into the same catchment?
What mechanisms are proposed to secure long-term maintenance of SuDS, and where is this evidenced in the Plan?
Doubts About Whether Sites Are Truly Deliverable
Some housing numbers in the Plan appear to depend on sites that may only work if major flood prevention measures are put in place, I believe that Dinas Powys is an example of this.
• It is not clear which sites depend on such measures
• There is no clear timetable or funding in place
• There is no backup plan if flood mitigation does not happen
I am concerned that the Plan may be relying on sites that cannot realistically be developed.
Question: Can the Council identify which allocations are dependent on flood mitigation infrastructure, and where the delivery, timing, and funding of that infrastructure are set out?
If mitigation fails to come forward, what contingency does the Plan provide to ensure housing delivery does not rely on undeliverable sites?
How does the Plan demonstrate that housing numbers are not inflated by sites whose flood risk constraints may ultimately prevent development?
Where NRW has expressed concerns or conditions relating to flood risk, how has the Council reflected those concerns in policy or allocations, rather than deferring them to later stages?

Has any NRW advice been departed from, and if so, what is the evidence base justifying that departure?
Climate Change and Long-Term Safety
Flooding is likely to become more frequent and severe due to climate change. The Plan does not clearly show that new development in or around Dinas Powys will remain safe for decades to come, not just during the Plan period.
Residents need reassurance that today's decisions will not create long-term flooding problems for future generations.
Question: How does the Plan ensure resilience to increased rainfall intensity and flood frequency over the full lifetime of development, not just the Plan period itself? Does the Plan assume future flood defences or upgrades, and if so, where are those projects committed and funded?
For these reasons, I believe the RLDP has not properly resolved flood risk issues affecting Dinas Powys, I ask that the Council be required to:
• Properly address flood risk at the plan-making stage, not later
• Remove or review sites where flood risk has not been clearly resolved
• Provide stronger evidence that new development will not increase flooding for existing residents.
Until this is done, the Plan cannot be considered sound.
3. Wastewater Treatment
This objection relates to the proposed level of housing growth in Dinas Powys and whether the existing wastewater and sewerage system can safely and realistically support it.
I am concerned that the RLDP does not provide clear, settlement-specific evidence to show that wastewater treatment works and the local sewer network have enough capacity to accommodate the planned development, either now or within the Plan period.
Without this evidence, the Plan risks placing unacceptable pressure on already constrained infrastructure, increasing the risk of flooding and environmental harm.
Wastewater Treatment Capacity
The RLDP does not clearly explain whether the wastewater treatment works serving Dinas Powys has sufficient spare capacity to deal with additional development.
In particular, the Plan does not set out:
• how much wastewater the treatment works is currently allowed to treat (its "consented capacity"),
• how much spare capacity is actually available,
• when this information was last assessed, or
• whether this assessment has been formally confirmed by Dŵr Cymru Welsh Water.
Without this basic information, I lack sufficient information to understand whether the existing system is already close to capacity or whether it genuinely has room to cope with new development.
The Plan also does not clearly state how much additional wastewater would be generated by the new housing proposed for Dinas Powys, or how this compares with any available
capacity. This makes it impossible to judge whether the level of growth proposed is realistic.
There is no clear evidence that a Dinas Powys–specific assessment has been carried out. If the Council is relying on broad, county-wide modelling instead, this does not reflect local conditions or known issues within the village.
Sewer Network Constraints & Flood Risk
Many residents are already aware of problems with drainage, surface water, and sewer performance in Dinas Powys, particularly during periods of heavy rainfall.
However, the RLDP does not provide clear evidence on:
• existing sewer surcharging or flooding incidents,
• past or current problems with overloaded sewers, storm overflow activity affecting the area.
There is also no clear explanation of how the combined impact of multiple new development sites in Dinas Powys has been assessed together, rather than individually. This is especially concerning given the increasing frequency of intense rainfall linked to climate change.
Dinas Powys has known surface water and flood risk sensitivities, yet the Plan does not convincingly demonstrate that increased wastewater flows will not make flooding worse or lead to pollution of local watercourses.
I am concerned that problems will only become apparent after development has already taken place.
Deliverability & Infrastructure Planning
The RLDP does not identify any specific wastewater or sewerage upgrades needed to support the proposed growth in Dinas Powys.
Where upgrades may be required, the Plan does not explain:
• what infrastructure improvements would be needed,
• how much they would cost,
• who would pay for them, or
• when they would be delivered.
This creates significant uncertainty. I am concerned that development could go ahead before infrastructure is in place, leaving existing communities to deal with the consequences of overloaded systems.
There is also no clear explanation of how infrastructure will be phased to ensure that wastewater capacity is available before new homes are occupied, rather than relying on solutions being found later.
Role of the Statutory Undertaker – Dŵr Cymru Welsh Water
The Plan appears to rely heavily on future discussions with Dŵr Cymru Welsh Water at the planning application stage to resolve wastewater issues.
I am concerned that this approach puts off important decisions that should be made now, during the Plan-making process. National planning policy requires development plans to be based on a clear understanding of infrastructure capacity, not assumptions that problems can be fixed later.
Without clear, written confirmation from Dŵr Cymru Welsh Water that the proposed level of growth in Dinas Powys can

be accommodated, I believe the Plan lacks the certainty needed to be considered sound.
Soundness & Policy Compliance
Because the RLDP does not clearly demonstrate that wastewater infrastructure:
• is available,
• can be upgraded in time, and
• has a realistic and funded delivery plan,
I do not believe the Plan is effective, which is a key test of soundness.
The Plan also appears to conflict with Planning Policy Wales, which states that development should be directed to locations where infrastructure is already in place or can be secured.
Deferring wastewater solutions to a later stage does not meet this requirement.
If wastewater capacity problems cannot be resolved within the Plan period, I question why the level of development proposed for Dinas Powys has not been reduced to reflect real infrastructure constraints.
4. Green Space & Green Infrastructure
For the reasons set out below I consider that the RLDP is unsound in relation to green space and green infrastructure in Dinas Powys because it:
• Fails to justify the loss of existing green space or show that mitigation will be delivered;
• Lacks clear evidence on the quantity, quality, and accessibility of green space;
• Does not safeguard the integrity of green infrastructure networks;
• Provides no mechanisms to ensure timely delivery of green space alongside new development;
• Does not demonstrate that alternatives were properly considered through the Sustainability Appraisal.
Until these issues are addressed, there is no clear basis to conclude that the proposed growth in Dinas Powys can be accommodated without unacceptable impacts on local green spaces and the wider environment.
I urge the Council to carefully consider these concerns and provide further evidence or modifications to ensure that the Plan is effective, sustainable, and compliant with national planning policy
Protection of Existing Green Space
The RLDP does not clearly explain why any existing green spaces in Dinas Powys might be lost, or whether the loss is unavoidable.
I am concerned that the Plan does not demonstrate:
• that all alternatives to protect existing green space have been considered, or
• that any replacement or mitigation will be provided within or near the village.
Without this evidence, there is no assurance that valued local green spaces, which are important for recreation, biodiversity, and the character of the settlement, will be preserved. This is a serious omission that makes the Plan unsound in this respect.
Question: How does the Plan justify the loss of any existing green spaces in Dinas Powys? Has an assessment been carried out demonstrating that loss is unavoidable, and that adequate replacement or mitigation will be provided within or near the settlement?
Quantity, Quality, and Accessibility of Green Space
The RLDP does not provide clear, settlement-specific information about the amount, quality, or accessibility of green space for Dinas Powys residents.
It is unclear whether the standards being applied:
• meet national policy requirements,
• reflect the needs of the local population, or
• will be sufficient to support an increased population from new housing.
Without clear evidence, I cannot be confident that new development will maintain adequate recreational and amenity space for all residents.
Question: What evidence supports the quantity, quality, and accessibility standards for green space in Dinas Powys? How do these standards compare with national policy and the needs of the local population?
Green Infrastructure Network Integrity
The Plan does not explain how green infrastructure networks—including wildlife corridors, footpaths, cycleways, and recreational routes—will remain coherent and functional as new development comes forward.
There is a real risk that the proposed growth could fragment these networks, reducing connectivity for wildlife and limiting access to recreational spaces. I am concerned that the Plan does not set out measures to prevent these negative impacts.
• Question: How does the Plan ensure that green infrastructure networks in Dinas Powys, including wildlife corridors, footpaths, and recreational routes, remain coherent and functional despite new development?
Delivery and Implementation
The RLDP does not make it clear how green space provision will be delivered at the same time as development, rather than being left to later planning agreements or discretionary decisions.
Without clear delivery mechanisms, there is no certainty that new or replacement green space will be provided when needed.
This creates risk that residents will face reduced access to recreation, wildlife habitats, and open space for years after new homes are built.
• Question: What mechanisms are in place to ensure that green space provision in Dinas Powys will be delivered alongside development, rather than deferred to later discretionary planning stages?
Consideration in the Sustainability Appraisal
It is not evident that the Plan's Sustainability Appraisal has fully assessed the impact of proposed development on green space and green infrastructure in Dinas Powys.
There is no clear explanation of whether alternative development options were considered that would reduce the loss or

fragmentation of green spaces, and if so, why these
alternatives were rejected.
I am concerned that the lack of settlement-specific analysis weakens the credibility of the Plan and its ability to safeguard local environmental assets.
Question: Has the Integrated Sustainability Appraisal fully considered the impacts of proposed development on green space and green infrastructure in Dinas Powys?
Were alternatives considered that would reduce loss or fragmentation, and if so, why were they rejected?
5. Health & Wellbeing
Alignment with RLDP Policy SP6
The RLDP does not clearly demonstrate how proposed allocations and policies affecting Dinas Powys will achieve the health and well-being objectives set out in Policy SP6.
In particular, the Plan does not provide evidence that new development will:
• maintain or enhance access to green spaces,
• support active travel (walking, cycling, public transport), or
• deliver inclusive and safe public environments for all residents.
Without clear mechanisms to ensure these outcomes, it is unclear how the Plan will contribute to the creation of healthy, inclusive communities in line with its own strategic policy.
Question: How does the Plan ensure that proposed allocations and policies affecting Dinas Powys will deliver the health and well-being objectives set out in Policy SP6, including access to green space, active travel, and inclusive public environments?
Alignment with the Vale of Glamorgan Well-Being Plan
The RLDP does not clearly show how its proposals for Dinas Powys are consistent with the objectives of the Vale of Glamorgan Public Services Board Well-Being Plan, particularly in relation to:
• physical and mental health,
• health equity, and
• equitable access to green and recreational spaces.
There is no settlement-specific evidence demonstrating that new housing or other
allocations will support these well-being objectives, leaving a gap in the Plan's justification and effectiveness.
Question: How does the RLDP demonstrate consistency with the Vale of Glamorgan Public Services Board Well-Being Plan, particularly the objectives relating to physical and mental health, health equity, and access to green spaces in Dinas Powys?
Evidence for Health and Well-Being Outcomes
The Plan does not provide sufficient evidence that its spatial strategy, site allocations, or policies will produce measurable improvements in health outcomes for residents of Dinas Powys, particularly in areas where health needs are identified.
Without this evidence, it is impossible to determine whether the proposed development will genuinely support improved physical or mental health, reduce health inequalities, or provide accessible, high-quality spaces for recreation and social interaction.
Question: What evidence demonstrates that the Plan's spatial strategy, allocations, and policies in Dinas Powys will produce measurable improvements in health outcomes for residents, especially in areas of identified need?
Integration with the Sustainability Appraisal
The RLDP's Integrated Sustainability Appraisal (ISA) does not clearly demonstrate how health and well-being impacts have been addressed specifically for Dinas Powys.
There is limited information on:
• mitigation or enhancement measures to support healthy communities,
• the contribution of proposed allocations to active travel networks, or
• ways in which new development will improve access to green infrastructure or inclusive public spaces.
Without settlement-specific consideration, the ISA does not provide sufficient assurance that health and well-being outcomes will be achieved, nor does it demonstrate compliance with national planning policy on creating healthy and sustainable places.
Question: How has the Integrated Sustainability Appraisal addressed health and well-being impacts specifically for Dinas Powys, and what mitigation or enhancement measures are proposed to ensure alignment with national planning policy on healthy places?
6. Education & Medical Services
I believe that the RLDP is unsound in relation to education and healthcare services in Dinas Powys
Education Provision
The RLDP does not provide clear, settlement-specific evidence regarding school capacity in Dinas Powys.
My key concerns include:
• There is no demonstration that local primary and secondary schools have enough places for the children who will arise from the proposed housing.
• It is unclear whether the Plan relies on borough-wide estimates, which may overlook local pressures and result in shortages at specific schools.
• The Plan does not identify any specific improvements to school infrastructure (such as new classrooms, extensions, or new schools), nor does it set out funding, timing, or delivery mechanisms.
Without these assurances, there is no certainty that school places will be available before families move in, which could lead to overcrowding and diminished educational standards.
I am concerned that, in the absence of firm evidence and infrastructure commitments, the proposed scale of housing growth in Dinas Powys may be unsustainable and undeliverable.

Healthcare / Medical Services
The RLDP does not demonstrate that local healthcare services—including GP practices, dental services, and community health facilities—can accommodate the increased population.
My specific concerns include:
• There is no settlement-specific assessment of current or future healthcare capacity in Dinas Powys.
• The Plan does not indicate whether additional or expanded healthcare facilities will be provided, nor how this would be funded, phased, or secured alongside new housing.
• Without clear planning, the proposed growth could reduce access to essential health services for both existing and new residents, impacting physical and
mental health outcomes.
I am particularly concerned that increased demand without confirmed provision could lead to longer waiting times, reduced appointments, and pressure on local medical staff,
undermining the well-being of the community.
These gaps mean the Plan is not effective, justified, or consistent with national planning policy, which requires growth to be planned where infrastructure is available or can be secured.
7. Affordable Housing Allocation
I support the principle of providing affordable homes for local residents, especially young families, first-time buyers, and key workers who cannot afford market rates.
Well-planned affordable housing can help maintain a mixed and vibrant community and retain younger residents.
Affordable homes in Dinas Powys could reduce commuting pressures by allowing residents to live and work locally.
However, the RLDP does not provide clear evidence for how many affordable homes are needed in Dinas Powys or what types of homes are required for different groups (families, older residents, low-income households).
There is insufficient information about how and when affordable homes will actually be delivered alongside market housing.
Without clear delivery plans or safeguards, affordable homes may not remain genuinely affordable in the long term.
Concentrated or poorly planned affordable housing may put pressure on local schools, healthcare, transport, and green spaces, which are already constrained in Dinas Powys.
The Plan does not explain how affordable housing will be integrated with market housing to create sustainable, mixed communities rather than segregation or social imbalance.
Because of the lack of clear evidence, delivery mechanisms, and mitigation for potential negative impacts, I do not consider the Plan sound in terms of affordable housing in Dinas Powys.

8. Community Cohesion & Social Integration
I am concerned that the Plan, as currently drafted, does not ensure new growth will support strong, healthy, and inclusive communities.
Until the Council provides clear evidence and enforceable measures addressing community cohesion, housing mix, and health impacts, I cannot have confidence that the Plan is sustainable or fair.
Impact on Community Cohesion and Social Integration
I am concerned that the Plan does not explain how new housing and growth will integrate with existing communities.
There is a risk that rapid development could strain local services, schools, and community spaces, and make it harder for neighbours to get to know one another.
I would like to see evidence that social infrastructure will keep pace with population growth and that communities will remain inclusive and connected.
Risk of Over-Concentration of Affordable Housing
I am concerned that clusters of affordable housing in certain areas could lead to pockets of social exclusion or limit access to opportunities.
The Plan does not explain how it will ensure a good mix of housing types and tenures across the Vale.
I ask that the Council provide evidence that housing allocations will support socially balanced, inclusive communities.
Impacts on Mental and Physical Wellbeing
I am concerned about increased traffic, air pollution, noise, and the loss of green spaces
affecting health and wellbeing. The Plan does not provide clear commitments to protect or improve accessible green spaces or safe walking and cycling routes.
I would like to see evidence that the Plan has assessed the health impacts of growth and will take steps to mitigate them.
9. Climate Change & Sustainability
I am concerned that, as drafted, the Plan does not provide enough evidence or practical measures to ensure new development is sustainable and climate resilient. The RLDP is not fully justified, effective, or consistent with national policy on climate change and sustainability.
Key gaps include alignment with carbon reduction targets, enforceable delivery of low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure.
Without clear policies and enforceable commitments on low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure, the Plan risks harming both the environment and the wellbeing of communities.
Alignment with Welsh Government's Carbon Reduction Targets
I am concerned that the Plan does not explain clearly how new homes, workplaces, and other development will help Wales meet its legally binding carbon reduction targets.
Without this, there is a risk that growth in the Vale could increase emissions rather than reduce them. I would like to see evidence showing how this (and each) new development contributes to lowering carbon emissions.
Promotion of Low-Carbon Travel, Energy-Efficient Homes, and Sustainable Drainage

I am worried that the Plan relies too much on people walking, cycling, or using public transport without clear plans to make this happen.
There is also little information on whether new homes will be energy-efficient or if systems to manage rainfall and reduce flooding (like sustainable drainage) will be properly installed and maintained.
I want to see clear, practical measures to make low-carbon travel, energy-efficient homes, and safe drainage a reality.
Resilience of Infrastructure to Extreme Weather Events
I am very concerned about the impacts of extreme weather, including flooding, heatwaves, and storms, on roads, utilities, and homes.
The Plan does not clearly show how new developments or existing infrastructure will be designed to cope with these risks.
I would like to have assurance that any buildings, roads, drainage, and community facilities will be climate-resilient and protect people's health and safety.
10. Plan-making Process & Evidence Base
In my view, the RLDP is not fully justified or effective in its current form with respect to plan-making and the evidence base. Key gaps include accessibility and transparency of evidence, consideration of resident and stakeholder feedback, and robust monitoring and review
arrangements.
Without clear and accessible evidence, demonstrated consideration of local feedback, and robust monitoring and review mechanisms, residents cannot be confident that the Plan will be fair, effective, or responsive to changing circumstances.
Clarity, Transparency, and Accessibility of Evidence
The RLDP is not always clear and is not easy to access.
Technical reports, data, and assumptions are often difficult to find or understand, making it hard for residents to see why particular sites or policies were chosen.
The Council should provide accessible summaries and clear explanations so that everyone can understand and comment on the evidence.
Local Consultation and Consideration of Resident Feedback
I am concerned that residents' views may not have been fully taken into account in shaping the Plan.
It is unclear how consultation responses have influenced allocation decisions or policy wording.
I seek assurance that feedback from local people and community groups has genuinely informed the Plan, and that future consultations will be inclusive and clearly reported.
Monitoring and Review Mechanisms
The Plan does not clearly explain how progress will be monitored or how changes will be made if things do not go as planned. For example, if housing delivery is slower than expected or infrastructure is delayed, there is little information on how allocations or policies would be adjusted.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6321 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mr Ioseff Davies [3528]

Summary:

The digital approach adopted in this consultation is likely to have excluded many people in the local community from participating and responding, thus providing an inadequate consultation. Indeed, completion of pdf forms and subsequently hunting down the correct e-mail address to return the form was a laborious process. I was unable to access the online form method.

Full text:

Dear responsible officer,
I am objecting to the inclusion of grounds Site ID 4069 Land East of Colwinston for the following reasons:

1. The land just below the proposed development is already subject to flooding and this development would add to the run off whilst removing land that can currently absorb water during periods of sustained rainfall. Building here will increase the risk of flooding to other houses. Flooding has been an issue in the Village and remains of concern to current homeowners. Evidence suggests that concern around flooding can impact negatively on people's health. Has a health impact assessment been undertaken? Furthermore, I believe that there have already been capacity issues with the local sewerage system.

2. This will negatively impact nature. The fields are designated farming/agricultural land. Farming land is vital for sustainable food. Brown field sites would surely be more appropriate for re-development, rather than developing current countryside. In addition to farming livestock (sheep are currently grazing on that site) there are woodpeckers living nearby (probably in the older trees located in the adjacent field), hedgehogs and bats are frequently seen, and Kites hunt on the fields, especially after harvest. The site is part of the rural setting of the Conservation Area. Extending the current boundary fundamentally alters the settlement envelope and, as outlined above, this also conflicts with the statutory duty to preserve or enhance. The proposal also lacks the required sufficient specific justification (see 3 below).

3. There is no public transport infrastructure, meaning that all house owners will be required to use cars, potentially increasing small village traffic by around an additional 50 cars (assuming 2 per house). There are already traffic bottlenecks at school drop off and pick up. The roads out of this development would exit via Heol Cae Pwll into the existing bottleneck area. Furthermore, the planning for affordable housing is counter intuitive given the lack of public transport infrastructure and the realistic need for car ownership to access shops etc. This has been previously noted when families without cars are housed in rural villages, they seek alternative housing because they simply cannot access shops or services. Therefore, this is likely to result in overdevelopment and its negative impacts on current villagers, without realistic prospect of providing true affordable housing to those in need. A number of houses are currently for sale in Heol Cae Pwll, with some having been on the market for many months. In other words this development seems to be at odds with the evidence of housing need, and also at odds with the evidence of housing demand.

4. It is at odds with government policy to increase active sustainable transport. Noting that walking along the A-48 towards Bridgend or Cowbridge is dangerous as there are no pavements, and there are no cycle paths until nearer to Bridgend (I'm assuming that the nearest cycle path is actually in Bridgend LA region rather than the Vale of Glam). Integrated Site Appraisal Inclusion of this site is not supported by the Integrated Site Impact Assessment contravening almost all of the stated Sustainability Objectives within the LDP itself.

5. The digital approach adopted in this consultation is likely to have excluded many people in the local community from participating and responding, thus providing an inadequate consultation. Indeed, completion of pdf forms and subsequently hunting down the correct e-mail address to return the form was a laborious process. I was unable to access the online form method.

6. Previous site assessments had deemed this site unsuitable for development following impact assessment. The change in decision now appears illogical. This further undermines the principle that the site development is consistent with evidence of housing need.

Yours sincerely,

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6363 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mr Steve Thorne [697]

Summary:

I am also aware that the consultation period is not in accordance with regulations regarding “due consideration”, and is based on the timing of forthcoming Senedd elections in May. It has become more of a political issue as opposed to that of logic and common sense.

Full text:

I wish to strongly object to the above proposal.

As a retired chartered civil and highway engineer I am fully aware that the existing infrastructure is overloaded and totally unable to accommodate more development , traffic , foul water disposal ……. and so on .

The above points were the fundamental and basic reasons why planning in 2010 was refused (when only 200 houses were proposed) .

Since then numerous housing developments in the west of the Vale of Glamorgan have been completed putting increased pressure on roads , schools, health care and centres, drainage disposal (foul , storm and highway) and other statutory services.

The Nant Talwg watercourse is continuously being subjected to “emergency”sewage overflow situations - the foul system and pumping station cannot handle the current increased volumes.

The current infrastructure was not designed for today’s requirements - it is outdated and unable to cope with increased traffic volumes and loadings from the additional developments .

I am also aware that the consultation period is not in accordance with regulations regarding “due consideration” , and is based on the timing of forthcoming Senedd elections in May.
It has become more of a political issue as opposed to that of logic and common sense.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tj3

6512 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mrs Mary Vincent [2657]

Summary:

I have found the fractured and piecemeal format of the online RLDP to be confused and confusing. It has necessitated endless repetition, and I was constantly forgetting where I was and what I had already said. In consequence, I am writing here an overall narrative to pull it all together.

My objections begin with a critique of the lack of transparency, accessibility and ease of engagement within the consultation process. The difficulty in navigating the scattered information restricts many residents' ability to engage meaningfully. Such a barrier is against the stipulations of Planning Policy Wales for enabling inclusive consultation. The too-narrow time frame for such a mammoth undertaking has also proved an additional unacceptable barrier.

Full text:

I have found the fractured and piecemeal format of the online RLDP to be confused and confusing. It has necessitated endless repetition, and I was constantly forgetting where I was and what I had already said. In consequence, I am writing here an overall narrative to pull it all together.

My objections begin with a critique of the lack of transparency, accessibility and ease of engagement within the consultation process. The difficulty in navigating the scattered information restricts many residents' ability to engage meaningfully. Such a barrier is against the stipulations of Planning Policy Wales for enabling inclusive consultation. The too-narrow time frame for such a mammoth undertaking has also proved an additional unacceptable barrier.

Change suggested by respondent:

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Sound: Not specified

Attachments:

2657 Vincent Barry_Redacted.pdf - https://valeofglamorgan.oc2.uk/a/tp8

6501 Object

Document Element: What Will Happen After the Consultation?

Respondent: Vicky Jewell [3610]

Summary:

1. The consultation form and accompanying literature/reports is excessively lengthy, making it difficult for many individuals, especially those with health challenges and older adults, to engage effectively. This renders the consultation process inequitable.
2. While I agree that personal details of those commenting should be shared with relevant Council members, these should not be made public, I question the legality of this. The current policy discourages participation due to fears of backlash, undermining fairness.
3. Neither I nor several other residents were informed about the public consultation event at Barry Memo Arts Centre on Monday, 2nd February, which is unfair.

Full text:

I oppose the Vale of Glamorgan Council Replacement Local Redevelopment Plan (RLDP), in particular the Weycock Cross, Barry development for the following reasons:

1. The consultation form and accompanying literature/reports is excessively lengthy, making it difficult for many individuals, especially those with health challenges and older adults, to engage effectively. This renders the consultation process inequitable.
2. While I agree that personal details of those commenting should be shared with relevant Council members, these should not be made public, I question the legality of this. The current policy discourages participation due to fears of backlash, undermining fairness.
3. Neither I nor several other residents were informed about the public consultation event at Barry Memo Arts Centre on Monday, 2nd February, which is unfair.
4. The term "unit" is undefined in the documents. Does it refer to an entire block of flats/apartments or a single flat within a block? Clarification is needed on the number of units/blocks and flats/apartments per block planned for the Weycock Cross, Barry and other sites.
5. The RLDP specifies a minimum of 30% affordable housing for the proposed Weycock Cross, Barry site which is substantial. However, the maximum percentage is not stated. What is the proposed maximum amount?
6. How much of the affordable housing will be acquired by the council or private entities and converted into social housing?
7. Regarding social housing occupancy - with VOG Council being a "county of sanctuary" and the Government's "Operation Scatter" initiative, how many individuals with illegal or uncertain immigration status or with indefinite leave to remain, will reside in Weycock Cross, Barry? This could significantly impact the area's culture.
8. How many Houses of Multiple Occupancy (HMOs) will be established at Weycock Cross, Barry? What is the maximum number of occupants per HMO? This also relates back to point 7.
9. Traffic congestion is already a significant issue around Weycock Cross, Barry. Additional housing developments at Weycock Cross, Barry and surrounding areas (e.g. Rhoose, Llantwit Major, St Athan, etc.) will exacerbate this, increasing air pollution and affecting access to Cardiff Airport and access for emergency services.
10. Flooding is a serious concern. Areas like Porthkerry Park and the Millwood already experience significant flooding, which development at Weycock Cross would worsen, to potentially catastrophic levels.
11. Illegal sewage dumping is likely to increase with new developments, compounding environmental and health issues.
12. The loss of green spaces and wildlife habitats is troubling, especially given the ongoing ash dieback affecting Porthkerry Park and surrounding areas. Traffic has also resulted in otter fatalities.
13. According to the Council's report, there are insufficient primary school places to accommodate new housing developments.
14. Health and well-being facilities, such as GP surgeries, are inadequate to support additional residents, as noted in the Council's report.
15. Public transport is insufficient. The nearest train station, Barry, is a considerable distance away and requires an uphill walk. Bus services are infrequent, making car travel necessary. Walking to and from the town center is impractical.
16. Concerns exist regarding the use of Persimmon for this development, given past issues with fire regulation compliance at the White Farm, Barry development and legal action required to enforce infrastructure commitments at both the White Farm and the Barry Waterfront developments. What guarantees will the Council put in place to ensure this won't be repeated?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6507 Object

Document Element: What Will Happen After the Consultation?

Respondent: Vale of Glamorgan Council Conservative Group [3614]

Agent: Councillor George Carroll

Summary:

Our Group has been approached by residents from across the Vale of Glamorgan expressing deep concerns regarding the consultation process. Many have found the consultation portal difficult to navigate, and relevant information hard to locate. Given the time required to read all the relevant documents prior to crafting a response, residents do not feel the six-week consultation process is sufficient. As a Group, we agree. For this reason, at Full Council on Monday, I requested extension to the consultation period. It is regrettable this was not granted.
As such, it is the view of our Group that the consultation is flawed. We therefore believe that it must be carried out again.

Full text:

I write regarding the ongoing consultation relating to the Deposit Plan. I make these representations in my capacity as Leader of the Council's Conservative Group. Please take this correspondence as our Group's response to the consultation.

Our Group does not consider any of the key sites designated within the Plan to be suitable. The respective ward members for St Athan, Rhoose, Illtyd and Dinas Powys have articulated detailed reasons for this previously. I too, as ward member for Llandough, have raised concerns regarding the impacts developing the Cardiff Road site would have on road safety issues at the Merrie Harrier junction.

Our Group has been approached by residents from across the Vale of Glamorgan expressing deep concerns regarding the consultation process. Many have found the consultation portal difficult to navigate, and relevant information hard to locate. Given the time required to read all the relevant documents prior to crafting a response, residents do not feel the six-week consultation process is sufficient. As a Group, we agree. For this reason, at Full Council on Monday, I requested extension to the consultation period. It is regrettable this was not granted.

As such, it is the view of our Group that the consultation is flawed. We therefore believe that it must be carried out again.

Thank you for taking the time to consider our representations.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6514 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mr Jason Vincent-Newson [3418]

Summary:

The volume of material is prohibitively large.
The site provides no summaries, no filtering, and no guidance on which documents matter most.
The time required to read everything is incompatible with the consultation deadline.
This raises legitimate concerns about accessibility, fairness, and procedural transparency.
The consultation is extremely poorly constructed, making it difficult for any user, particularly those less digitally experienced, to find where and how to provide feedback.
Several of the key supporting documents (flood assessment, candidate site assessment, etc) are only available in English.
Feedback is typically limited to 100 words.
Unclear whether the online comment boxes are meant to be taken in addition to, or instead of, the single downloadable feedback form.
An AI assessment shows that the site is functional but not especially user centred. It presents information in a very linear, text-heavy, and document-driven way, which makes it technically complete but practically difficult for residents to navigate and meaningfully engage with.
Planning consultations are legally required to be accessible. This specific, quantifiable overview provides clear evidence that the consultation process as it is currently being facilitated fails at this first requirement as it is totally unrealistic to expect the public to have any meaningful opportunity to read and review the supporting documentation in the time available that is critical to the entire consultation process.

Full text:

Vale of Glamorgan Deposit Replacement Local Development Plan Public Consultation

Local resident RLDP consultation feedback based on review of RLDP information and supporting documents as hosted

on RLDP website https://valeofglamorgan.oc2.uk/

Objection:

"2026 RLDP consultation process is flawed and does not provide for meaningful public consultation on multiple grounds"

This document contains an analysis of the RLDP OC2 website used for the public consultation process, highlighting the multiple ways in which it creates barriers to any meaningful consultation with the public.

Also included is communication sent to the Vale of Glamorgan planning department during the RLDP consultation period, requesting these concerns to be considered and an extension of the RLDP consultation period to be granted. This was refused.

I would like the contents to be included in my RLDP submission

Ref: NWB_RLDP_JVN_010

Date: 10th March 2026Re: RDLP consultation period (proposed Weycock Cross housing development)

23rd February 2026

Hello

I am writing to you to raise serious concerns regarding the current Vale of Glamorgan council RDLP consultation process which I believe is demonstrably undemocratic and fails to meet the basic standards of accessibility required by such a consultation.

On the basis of the concerns outlined in the attached document, I would request that the consultation period be extended by a period of at least 2 months to provide any chance of the public being able to engage in the process in a fair and democratic way.

In light of the fact that the consultation exercise cutoff date is set for 11th March 2026, I would appreciate your response on this request at the earliest opportunity.

As a local resident of the area directly affected by the proposed development, I was an active participant in the previous consultation process (July 2025) via making written submissions and also by speaking as a member of the public at the Placemaking Scrutiny council meeting held in late 2025.

I am currently in the process of attempting to review the contents of the RDLP consultation website https://valeofglamorgan.oc2.uk/ in order to provide consultation feedback before the 11th March 2026 consultation window cutoff date.

Despite having spent many hours attempting to navigate the site and read and review the supporting documentation in order to give my feedback, this is proving virtually impossible, not only due to failings in the design of the website (further details below) but primarily due to the sheer volume of supporting documentation that the public are being expected to provide feedback on within the limited time window. As a result of becoming increasingly overwhelmed at the seemingly impossible task of simply accessing and reviewing the supporting documents, I took a moment to stop and assess the volume of content:

Considering only the 'landing page' at https://valeofglamorgan.oc2.uk/ (containing the main linked blocks 1-8) the excessive volume of documentation provided for the consultation process is astonishing. I ran a quick website audit on the supporting PDF documentation* contained solely on these 8 primary linked pages with the following results:

Total number of supporting PDF files: 159

Total (combined) file size of PDF files: 1034.7 MB

*Note: English language PDFs only; Welsh language PDFs not included in totals; further linked PDF documents at a lower URL level not counted. HTML content (web pages themselves) not included - this is only the supporting PDF documentation.

These numbers in themselves might not mean much to many people, but as someone who regularly uses AI tools in my work then in order to put them in perspective I ran these numbers through Google's AI assistant tool using the query "How long would it take to read, review and provide feedback on 1034MB of PDF files which are supporting documents in a public planning consultation?"

This provided the following results:

"Al Overview:

Based on these parameters, reviewing 1034 MB of planning documents would take approximately 1,103 hours, or 138 standard working days (8 hours/day).

Steps to calculate:

Using an industry-standard density of 10 pages per megabyte, with a typical text-to-image ratio of 90% to 10%, this results in approximately 9,300 pages (text) and 1034 pages (graphs/images).

Reviewing planning documents is more intensive than casual reading, as it requires analysis and drafting feedback. Estimating 6 minutes per page (text) and 10 minutes per page (graphs/images/diagrams) for reading, cross-referencing and feedback drafting:

9300 pages X 6 minutes/page = 55,800 minutes

1034 pages X 10 minutes/page = 10,340 minutes

Total: 66,140 minutes = 1103 hours = 138 daysAnswer: It would take a single reviewer approximately 1,103 hours (roughly 27.5 weeks of full-time work) to complete this task. For a standard 30-day consultation period, this workload would require a team of at least 7 to 8 full time reviewers."

Conclusion:

Planning consultations are legally required to be accessible. This specific, quantifiable overview provides clear evidence that the consultation process as it is currently being facilitated fails at this first requirement as it is totally unrealistic to expect the public to have any meaningful opportunity to read and review the supporting documentation in the time available that is critical to the entire consultation process.

These failings can be summarized as follows:

The volume of material is prohibitively large. The site provides no summaries, no filtering, and no guidance on which documents matter most. The time required to read everything is incompatible with the consultation deadline. This raises legitimate concerns about accessibility, fairness, and procedural transparency.

On the basis of the above, I would request that the consultation period be extended by a period of at least 2 months to provide any chance of the public being able to engage in the consultation process in a fair and democratic way.

In addition to these primary concerns over the sheer volume of supporting documentation needing to be read and reviewed, the website itself has serious failings in many other areas (see further notes below) which mean it further fails to meet the standards legally required for such a consultation process.

Therefore I would also request that serious consideration is given to a review of the consultation website as it is currently provided with a view to improving its accessibility to all users as is legally required.Concerns regarding website design, structure and implementation

1. The consultation website https://valeofglamorgan.oc2.uk/ is extremely poorly constructed, making it very difficult for any user, particularly those less digitally experienced, to find where and how to provide feedback.

For instance, following the first link on the homepage: "1: Vale of Glamorgan Deposit Replacement Local Development Plan" takes you through to the "Proposals Map" page which has a handy section saying "Have Your Say on the Deposit RLDP"; this leads immediately to the next section "How to Comment on the Deposit RLDP" which in turn states "The Council encourages responses to be made via its online consultation portal, which includes features to help you comment... " This is followed by the sentence: "The online consultation portal can be accessed at: https://valeofglamorgan.oc2.uk" whereby this link takes you right back to the original opening page where the user is faced with the same 8 boxes to choose all over again (this is called circular navigation and is a common sign of poor website implementation).

2. The website makes no attempt made to curate, organise or structure the supporting documentation in a manner that eases the burden on the user caused by the excessive volume. For instance, it is impossible to follow any logical path or structure to locate, read and review supporting documents pertaining to a single (in my case, Weycock Cross) development. For this reason, it is necessary to wade through the full reams of PDF documents as outlined above simply in order to locate any sections relevant to a particular proposed development.

3. Many, but not all of the PDF documents are available in both Welsh and English however several of the key supporting documents (flood assessment, candidate site assessment, etc) are only available in English

4. In addition to the single downloadable consultation feedback form there are multiple areas of the website where it is possible to provide feedback comments, however these are typically limited to 100 words, and the ability to provide comments in this way is scattered and unstructured (comments are available for some documents, but not for others, with no way of knowing whether any comment-able documents have been missed).

Likewise it is totally unclear whether those online comments boxes are meant to be taken in addition to, or instead of, the single downloadable feedback form. This simply adds to the overwhelming feeling of the user not knowing whether they have been able to provide the necessary feedback as part of the consultation process, and this simply reinforces the sense of exclusion and alienation from the whole consultation process.

5. Finally, in order to generate an impartial summary of the website's suitability as a legal platform for the RLDP consultation process I used Microsoft's Copilot AI tool to perform a quick scan and summary of the https://valeofglamorgan.oc2.uk website:

Copilot prompt: "Provide an assessment of how well constructed is the website https://valeofglamorgan.oc2.uk, and how easy is it to assess the content of the website for the process of providing feedback as part of the consultation process?"

The results are as follows:Overall Assessment of the Website's Construction Website: https://valeofglamorgan.oc2.uk Context: Public consultation platform for the Vale of Glamorgan Replacement Local Development Plan (RLDP)

Based on the page content, the site is functional but not especially user-centred. It presents information in a very linear, text-heavy, and document-driven way, which makes it technically complete but practically difficult for residents to navigate and meaningfully engage with.

1. Website Structure & Usability: Document-heavy, not task-oriented The site is essentially a list of links to large document sets. There is no thematic summary, no "start here" guidance, and no filtering by topic, impact, or geography.

No visual hierarchy Everything is presented as a flat list of expandable sections. Important items (e.g., the main plan) look visually identical to minor supporting documents.

No integrated search or tagging Users cannot search within the consultation documents or filter by theme (transport, housing, environment, etc.).

No previewing or quick-read tools Documents must be downloaded individually. There is no: in-browser PDF viewer executive summary extraction keyword search across documents "what's changed since last plan" summary This makes the site feel more like a document repository than a public engagement tool.

2. Accessibility of Content for Feedback Purposes Major Barriers:

Volume of documents The "Supporting Documents" and "Key Site Supporting Information" sections contain very large numbers of PDFs, many of them hundreds of pages long. The site provides no indication of: file size page count document purpose relevance to specific policies

Lack of contextual summaries The site does not provide: plain-English summaries policy impact explanations maps or interactive tools "what this means for your area" guidance

Fragmented navigation Clicking into a document often sends the user to a new page with more links, and sometimes back to the starting point - a common OC2 issue that creates a sense of circular navigation.

No support for lay readers Planning consultations are legally required to be accessible, but the site provides no: glossary simplified overview video explainers thematic breakdowns

Feedback process is unclear The homepage says: "For instructions on how to use the system and make comments, please see our help guide." But the help guide is not integrated into the workflow, and users must find it manually.3. How Easy Is It to Provide Feedback? Short answer:

Not easy at all. The platform meets the minimum legal requirement of making documents available, but it does not meaningfully support residents in understanding or responding to them.

Why it's difficult

Users must manually open and read dozens or even hundreds of PDFs. There is no summary of key issues requiring feedback. There is no guided questionnaire or structured comment form linked to specific policies. The site does not help users understand which documents are essential and which are technical appendices. The burden of interpretation is entirely on the resident.

Effect on public participation This design unintentionally favours:

planning professionals developers consultants residents with significant time and technical literacy It disadvantages:

ordinary residents people with limited time those unfamiliar with planning terminology

4. Overall Verdict Construction quality: Functional but outdated and not user-centred.

Ease of assessing content: Low - the site is difficult to navigate and lacks essential tools for understanding the material.

Ease of providing feedback: Low - the process is unclear, and the volume/complexity of documents creates a high barrier to meaningful participation.

What this means for the consultation Based on the structure visible on the website : The volume of material is prohibitively large. The site provides no summaries, no filtering, and no guidance on which documents matter most. The time required to read everything is incompatible with the consultation deadline. This raises legitimate concerns about accessibility, fairness, and procedural transparency.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3p5

6518 Object

Document Element: What Will Happen After the Consultation?

Respondent: Professor Andrew Vincent [920]

Summary:

I am concerned about the Vale of Glamorgan RLDP and Weycock Cross NW Barry site, particularly regarding how the RLDP has been presented and the limited time for public consultation. Vale Planning claims the six-week period is statutory, but the real issue is the poorly organised, overwhelming amount of technical information, which is difficult for residents to understand. The website's lack of clear guidance and inaccessible documents, especially for those with limited digital skills, undermines democratic participation. An AI analysis suggests reading the entire RLDP would take over 27 weeks, highlighting the impracticality of meaningful review within the consultation period.

Full text:

Re the Vale of Glamorgan Planning RLDP and the Weycock Cross NW Barry site. There are two related issues which concern me as a resident. The first focuses on the Vale RLDP as a whole and a major concern is the manner in which the whole RLDP has been presented to the public and the compressed time period in which to read, digest and comment.

Vale Planning have already recently replied to a number of residents on the above timing question, namely, that they (Vale Planning) were only fulfilling a statutory requirement of six weeks. This response misses the point. The statutory consultation period is not the issue for residents. The core issue is rather the clumsy, overlong and ill-organised character of the whole RLDP, which eats up time. Vale Planning have a public duty of care for local residents, namely, to minimally help and facilitate public understandings of the issues. Sadly they entirely failed in this basic responsibility. Intentionally or not Vale Planning quite literally dumped thousands of pages of technical documents on the website with little or no guidance or clear pathways for ordinary readers, which is an unforgivable administrative lapse.

Vale Planning have argued that they do provide short executive summaries for documents. However this argument cuts no ice. Most of the executive summaries give no clear indication as to whether there are any substantive details about a relevant site for the reader. Therefore one can only ascertain whether a particular site is being addressed by trawling hundreds of pages of dense technical text. Consequently, the arguments that residents should either only read and comment on their own site, or that they should only read executive summaries, is spurious. Multiple PDFs in the RLDP on, for example, traffic, drainage, the environment (dropped in at random throughout the whole RLDP website), will often contain more detailed micro-policy comments on a relevant site. However, such micro-policy comments are literally submerged deep within hundreds of pages of dense text. The overall effect of this kaleidoscopic website is thus continual bafflement.

Like many residents I attended the walk-in sessions with Planning; however the only advice we were given by Planning operatives when we raised critical queries was that we had to consult the details of the online website. Notably this was also the same case for any paper-based responses. The supposed online evidence documents had to be addressed. The website has therefore been the evasive linchpin of this whole debacle. This makes the whole consultation process largely inaccessible to ordinary folk and those who have limited digital skills or limited time due to responsibilities. In point, for those with limited digital skills, the online RLDP offends against basal principles of natural justice. It is intrinsically discriminatory. This is simply not democratic consultation.

It is worth noting here, in passing, the factual nature of this timing issue. In running a Microsoft's CoPilot AI full analysis of the current RLDP, in terms of basic reading time, evaluation and assessment of the document. CoPilot concluded that "It would take a single reviewer approximately 1,103 hours (roughly 27.5 weeks of full-time work) to complete this task". This would be reading every day, all day, for 27 weeks. Bizarrely, Vale planning and Council appear to see no problem here whatsoever.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Paper Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tpg

6536 Object

Document Element: What Will Happen After the Consultation?

Respondent: MS Andrew R T Davies [1324]

Summary:

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

Full text:

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

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6551 Object

Document Element: What Will Happen After the Consultation?

Respondent: Daisy Williams [3632]

Summary:

The consultation process for this proposed development raises serious concerns regarding accessibility and fairness. The objection form provided for public responses is difficult to access and not user-friendly, which creates a barrier for residents wishing to participate in the consultation. Under Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, planning authorities must ensure that consultation procedures are accessible and allow meaningful public participation. Additionally, the principles of public participation set out within Planning Policy Wales require planning authorities to provide clear, transparent, and inclusive consultation opportunities so that all members of the community can engage with the planning process.
Where consultation mechanisms are difficult to locate, inaccessible, or overly complex to use, this restricts the ability of residents to submit representations and undermines the legitimacy of the consultation process. Public consultation must be conducted in a manner that is fair, transparent, and genuinely accessible to the community affected by the proposed development. If residents face barriers when attempting to submit objections or feedback, the consultation cannot be considered fully compliant with the principles of meaningful public engagement required in the planning process.

Full text:

I submit a formal and unequivocal objection to the proposed residential development of approximately 376 dwellings on the 18.73 hectare site at North West Barry. While the need for housing, including affordable housing, is acknowledged, the scale and location of this development will place unacceptable and unsustainable pressure on existing infrastructure, public services, educational provision, and the natural environment. The proposal fails to satisfy the requirements of Welsh planning policy and does not demonstrate that the town of Barry possesses the capacity to absorb such a significant population increase without serious and long-lasting harm.

Conflict with Welsh Planning Policy Under Planning Policy Wales, development must follow the principles of sustainable placemaking and ensure that infrastructure, services, and environmental protections are in place to support population growth. The proposal fails to meet these fundamental requirements.

Planning Policy Wales states that development must:

* Deliver sustainable locations with adequate infrastructure * Protect and enhance biodiversity and green infrastructure * Avoid placing unacceptable pressure on public services * Promote sustainable transport and reduce reliance on private vehicles

The current proposal fails to demonstrate compliance with these principles. No clear, binding commitments exist to deliver the infrastructure, educational capacity, healthcare provision, or environmental protections required to support 376 additional dwellings.

Furthermore, the Future Wales - The National Plan 2040 emphasises sustainable growth, protection of green infrastructure networks, and resilience to climate change. The large-scale development of open land on the edge of Barry directly conflicts with these objectives.

Severe Pressure on Local Schools

The proposed development will directly intensify existing pressures on local educational facilities. Schools within Barry already operate under high levels of demand, with waiting lists and limited capacity in several year groups.

Secondary schools such as *Whitmore High School* Pencoedtre High School* and *Ysgol Gymraeg Bro Morgannwg** already serve expanding catchment areas and face increasing enrolment pressure.

The addition of approximately 376 dwellings will generate a substantial number of additional school- aged children. Without the construction of new school facilities or significant expansion of existing schools, classroom overcrowding will intensify, waiting lists will expand, and local families will face reduced access to education within their community.

Planning authorities have a statutory duty to ensure that adequate educational provision exists before large residential developments are approved. This proposal fails to demonstrate that sufficient educational infrastructure accompanies the planned housing.

*Inadequate Healthcare Capacity**

Primary healthcare services in Barry already experience substantial demand. Local GP surgeries operate under capacity constraints and residents routinely experience extended waiting times for appointments.

The addition of hundreds of new households will significantly increase demand for GP services, dental care, community health provision, and pharmacy access. Without the simultaneous development of new healthcare facilities and additional medical staff, residents will experience worsening access to essential healthcare services.

This directly contradicts the planning principle that population growth must be matched with proportional expansion of public service capacity.**Transport Congestion and Infrastructure Failure*

The proposal recognises that *Weycock Cross Roundabout** already experiences significant congestion during peak commuting hours. This junction serves as a critical traffic node for the town and regularly experiences heavy queues.

The development will generate a substantial increase in daily vehicle movements connecting to A4226 Port Road West* intensifying congestion and reducing road safety.

Transport studies across the United Kingdom consistently show that new suburban housing developments increase vehicle dependency and traffic volumes. The Department for Transport** reports that suburban households typically generate multiple car journeys per day, particularly where employment centres are located outside the immediate area.

Incremental modifications to junction layouts do not address the structural limitation of a road network already operating close to capacity. Increased congestion results in longer commute times, greater accident risk, and elevated vehicle emissions.

*Environmental Damage and Biodiversity Loss**

The development site currently provides open land which contributes to ecological stability, wildlife habitats, and natural biodiversity. Urban development of this land will permanently disrupt ecosystems, fragment habitats, and reduce biodiversity levels.

The *Intergovernmental Panel on Climate Change** identifies land-use change and urban expansion as major contributors to biodiversity decline and environmental degradation. Once natural landscapes are replaced with housing infrastructure, ecological restoration becomes extremely difficult.

Furthermore, research from the UK Centre for Ecology & Hydrology** demonstrates that green spaces surrounding towns provide essential ecological services including flood mitigation, carbon storage, air purification, and wildlife corridors.

Development of the site undermines these environmental functions. Even when partial open space remains within housing developments, ecological quality declines significantly due to human disturbance, light pollution, and habitat fragmentation.

*Flood Risk and Drainage Concerns**

Open land naturally absorbs rainfall and reduces surface water runoff. Replacing permeable land with roads, roofs, and hard surfaces increases the risk of surface water flooding.

Research from the Environment Agency demonstrates that urban expansion significantly increases stormwater runoff, placing pressure on drainage systems and increasing flood risk in surrounding areas.

As extreme weather events become more frequent due to climate change, preserving permeable green land becomes increasingly important for managing water flow and protecting surrounding communities.*Climate Change and Carbon Impact**

Large-scale housing developments increase construction emissions, energy consumption, and long- term transport emissions. Construction materials such as concrete and steel generate significant carbon emissions during production.

The Climate Change Committee has emphasised the need for the UK to reduce emissions associated with land-use change and construction in order to meet legally binding climate targets.

Encouraging further suburban expansion that relies heavily on private vehicle travel conflicts with national climate commitments and undermines sustainable development objectives.

Loss of Local Character and Community Identity**

Barry possesses a distinctive character shaped by its historic development pattern, surrounding landscapes, and established communities. Rapid large-scale residential expansion risks eroding this identity and replacing it with dense housing estates disconnected from the town's traditional structure.

Sustainable placemaking requires balanced development that integrates infrastructure, community facilities, and green space. Housing-led expansion without equivalent investment in social infrastructure undermines community cohesion and reduces overall quality of life.

**Impact on Existing Residents*

Residents already living in the surrounding area will experience significant and direct negative impacts including:

* Increased traffic congestion and road safety risks * Overcrowding within local schools * Reduced access to healthcare services * Increased noise and air pollution * Loss of nearby green space and natural landscape * Additional pressure on public services and community resources

These consequences directly reduce the quality of life for existing residents who rely on already stretched local infrastructure.

*Conclusion**

The proposed development at North West Barry fails to satisfy the fundamental requirements of sustainable planning under Welsh national policy. It places severe pressure on schools, healthcare services, transport infrastructure, and environmental resources while offering no credible guarantees that these systems will expand proportionally.

The development also conflicts with national environmental objectives, contributes to biodiversity loss, increases flood risk, and undermines climate commitments.

For these reasons the proposal must be rejected in its current form. Any future development must demonstrate full compliance with national planning policy, provide new educational and healthcareinfrastructure, deliver genuine environmental protection, and ensure that Barry's community, infrastructure, and environment are not placed under unsustainable pressure.

* Accessibility and Fair Consultation Concern**

The consultation process for this proposed development raises serious concerns regarding accessibility and fairness. The objection form provided for public responses is difficult to access and not user-friendly, which creates a barrier for residents wishing to participate in the consultation. Under * *Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 , planning authorities must ensure that consultation procedures are accessible and allow meaningful public participation. Additionally, the principles of public participation set out within Planning Policy Wales** require planning authorities to provide clear, transparent, and inclusive consultation opportunities so that all members of the community can engage with the planning process.

Where consultation mechanisms are difficult to locate, inaccessible, or overly complex to use, this restricts the ability of residents to submit representations and undermines the legitimacy of the consultation process. Public consultation must be conducted in a manner that is fair, transparent, and genuinely accessible to the community affected by the proposed development. If residents face barriers when attempting to submit objections or feedback, the consultation cannot be considered fully compliant with the principles of meaningful public engagement required in the planning process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6563 Object

Document Element: What Will Happen After the Consultation?

Respondent: Miss Julia Thompson [2631]

Summary:

The sheer volume of documents to understand on the web pages has made it very difficult for average locals to understand fully.

Full text:

The sheer volume of documents to understand on the web pages has made it very difficult for average locals to understand fully.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Paper Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rb

6597 Comment

Document Element: What Will Happen After the Consultation?

Respondent: Mr David Barton [2683]

Summary:

LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.

Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.

Full text:

Context:
This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.
This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.
Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.
It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.
*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.
Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.
Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to

existing Planning Policy documents are necessary to ensure the best possible outcomes.
References to supporting documents are contained in the indented blue numbering.
This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.
Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.
Community Campaigner David Barton:
Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.
Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.
SECTION 1: Design Codes:-
1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.
5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).
6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.
7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.
8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.
9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.
10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.
11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.
12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.
SECTION 2: Designated & Non-Designated Heritage Assets:
1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.
2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.
3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as "Memory Lane" featured on InYourArea Magazine to enrich existing material archives.

4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.
5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.
6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.
7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.
8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.
9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.
10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area’s founding or history locally.
11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.
12. Reconstruction Programme harnessing existing limited crafts people’s skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.
13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain’s Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.
14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.
SECTION 3: Conservation Areas:-
1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements.
9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer

discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.
SECTION 4: Climate Change:-
1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.
4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.
5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.
6. Biodiversity- maximise greenery along all arterial roads ad commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.
7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.
8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.
9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.
10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.
SECTION 5: Historic Buildings:-
1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.
2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.
3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.
4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.
5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.
6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.
7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through

personal circumstances.
8. “Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.
9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.
10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.
11. Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.
12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.
SECTION 6: Traditional Vernacular Architecture:-
1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.
2. These same people should be readily contactable for new construction
3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don’t have the time to do this themselves or may be risk averse even.
6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.
8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.
9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.
10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.
11. Building Form shouldn’t permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.
12. Façade Design mustn’t be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.
SECTION 7: Making an application:-
1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.
5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and
Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.
7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking

part again whether they are locally, regionally or nationally based.
8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
9. Proactive effort to stop Breaking and Entering style of “Urban Explorers” who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).
SECTION 8: MISCELLAENOUS:-
1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.
8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.
9. Provide a focused effort on utilising people’s skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.
10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.
11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.
12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - https://valeofglamorgan.oc2.uk/a/33d

6735 Comment

Document Element: What Will Happen After the Consultation?

Respondent: Ms Sarah Forster [2046]

Summary:

I believe that this stage and future processes must not be rushed and require thorough consideration. Insufficient time has been given for decision makers and the public to review the overwhelming evidence, with concerns raised about the speed of decisions and the volume of information. The consultation period was too short, causing undue pressure on the community, and community engagement has been poor.
Many in the community have said that this a 'done deal' Why, by so many people and so often? and 'don't bother wasting your energy (making representations) it won't make any difference'.
Future evidence gathering and decision making should be genuinely independent, avoiding conflicts of interest, and ensuring proper examination by experienced, independent bodies to ensure soundness and statutory compliance.

Full text:

As a resident of Dinas Powys, this submission focuses on Site Reference HG1 KS2 Land to the North of Dinas Powys. My key concerns, comments, queries and objections are set out in the attached Annex.
Site Reference: HG1 KS2 Land to the North of Dinas Powys I Disagree / Object and request that the VoGC reconsiders the allocation of this site within the replacement RLDP. Development at Eastbrook would not be sustainable.

Comments:
As a resident of Dinas Powys, this submission focuses on Site Reference HG1 KS2 Land to the North of Dinas Powys. Please find below a summary of my key concerns, comments, queries and objections - there is crossover and duplication in parts. I would consider speaking at any future hearings.
1. It is crucial that this stage and future processes and decisions are not rushed, that matters are given full and proper consideration. There has been insufficient time for decision makers and the public to review and the information and evidence, which is overwhelming. Minutes / recordings of previous council meetings suggest that councillors were required to reach decisions swiftly and without the opportunity to properly consider the documents / evidence and that the RLDP was rushed through to public consultation in spite of valid concerns raised by councillors and pleas for sufficient time to consider the evidence. See for example the minutes of the place scrutiny committee extraordinary hybrid meeting on 6th January 2026 and the recording of that meeting where Councillors raised concerns regarding the volume of papers (900+ pages). The public has similarly been placed under acute pressure to navigate and digest the information presented, prepare and submit representations. Has it not been possible / deemed appropriate to extend the statutory 6 week consultation period? Would it not be appropriate to repeat it? 6 weeks has been insufficient for this consultation, the community has been placed under undue pressure and community engagement has been poor. The onus has been left on the community to engage and muddle through the information. Drop in sessions have not provided answers to the deep concerns of residents relating, inter alia, to traffic congestion and flooding. Circa 7 / 8 months? has been allocated to consider the representations in preparation for Stage 4 submission - which is disproportionate to the time afforded to this consultation.

2. Many in the community have said that this a 'done deal' Why, by so many people and so often? and 'don't bother wasting your energy (making representations) it won't make any difference'.

3. Future processes, evidence gathering and decision making must be genuinely independent, avoid any potential for conflicts of interest and ensure that issues and gaps in evidence are properly and fully addressed in good time – decisions should not be rushed through. If Eastbrook remains in the Deposit RLDP at Stage 4, Welsh Government and the Planning Inspectorate must ensure that the Independent Examination process into the soundness of the plan and compliance with statutory requirements is dealt with by highly experienced and wholly independent individuals / organisations with the skills and confidence to reach the correct and independent conclusions.

4. Statements that Eastbrook is in a sustainable location with good access to local services and will also deliver investment in highways improvements, additional school places....." (VoGC spokesman, Penarth Times 9th March 2026) would need to be substantiated. Senior schools, for example, are already significantly oversubscribed. Highways improvements won't alleviate the congestion on the roads. Congestion on the roads will get even worse. Dinas Powys will never have a bypass.

5. In recent years there has been significant development in Dinas Powys including at Scholars Park and two other locations. Development at Eastbrook, which would join us with Penarth and Llandough, is too far.

6. Any claims that 'modern sustainable drainage systems' would be capable of managing surface water runoff and reduce the risk of flooding would need to be substantiated.
The Eastbrook runs through the proposed site and when it rains (even light rain) the fields become very boggy and impassable. Water runs from Seel Park, down the path towards Highfields. There are significant underground water courses at Seel Park and issues with the drainage. Development will only exacerbate the problem and create huge issues for Dinas Powys, Llandough and wider. There won't be any / sufficient land for the water to drain into. Drainage ditches / suds won't work, not for anything more than a light shower.
Residents at Wayside say they have been hit by flooding and silt since the Llandough hospital car parks and new buildings were built, with drainage diverted into the Eastbrook river through attenuation tanks - i.e. that the attenuation tanks have not worked and indeed have made the situation and risk worse.
It is hard to see how the risk of flooding could be mitigated by development at Eastbrook and 'modern sustainable drainage systems'.
Cogent, independent, evidence is required.
It is noted that the same consultants commissioned by the VoGC to undertake the section 19 flood investigation into the 23rd December 2020 flood event have been part of the Persimmon / Boyer team in relation to the Eastbrook development (providing technical support on drainage and services). I'm confused why the Persimmon team / the VoGC would claim that 'modern sustainable drainage systems' would mitigate the risk of flooding.
7. Building on the greenbelt to meet alleged affordable housing requirements - where local infrastructure is already under immense pressure, schools and the medical centre are significantly oversubscribed with limited expansion potential, traffic congestion will worsen and our flood risk will be heightened - is wrong.
8. The negative impact on the mental health and wellbeing of the community cannot be underestimated or ignored.
9. The wildlife habitat will be lost.
10. Dinas Powys does not have links to existing and new employment zones. It is a rural village. I have not seen evidence in support of a need for so many houses in our rural location. We are looking at hundreds and downstream potentially thousands of people and no jobs to support them.
11. Businesses, employers of all sizes and across all sectors are having a challenging time - redundancies have been steadily increasing for some time. Things are hard and not likely to improve.
12. Under the proposals Dinas Powys would become a commuter belt zone, increasing car use and traffic in the Vale and beyond - contrary to the RLDP objectives.

13. Dinas Powys, Llandough and Penarth would become one if the Eastbrook site goes ahead - whether 250 houses or more. The site lies on the northern edge of the village and is part of the open countryside. Development would erode the existing settlement boundaries. Even though the VoGC may have advised has Persimmon that a smaller higher density residential allocation would be more appropriate, there is talk that Persimmon will eventually succeed in obtaining consent to build 650+ houses. Any development at Eastbrook would remove a huge proportion of the green rural space, which people enjoy and need.
14. A development at Eastbrook would invariably result in an increase in anti-social behaviour and crime, as has happened with Scholars Park whereas historically Dinas Powys has been a rural village with contented residents and a low crime rate - a key reason for my family moving to Dinas in 1975.
15. 40% + affordable housing seems disproportionate.
16. Access to the Eastbrook site is also a concern. Didn't the VoGC Highways department previously conclude that the Eastbrook site is unsuitable?
17. People will continue to drive through Dinas to reach Cardiff, Barry etc - mostly by way of necessity not choice. People need to and will continue to drive - it would be naive to suggest that people will use alternatives to cars and / or that electric vehicles will be the norm. It would be naïve to claim that people will drive less and public transport is a viable alternative to using cars. For example the newish Cardiff bus service to the medical centre on Murch Road. Bus drivers / Murch Road residents say that the bus is always empty. Trains to Cardiff are overcrowded, too infrequent and often delayed or cancelled. The train stations in Dinas Powys are not really accessible. There is no parking at Dinas and the parking at Eastbrook is limited. From Eastbrook the easiest option is to drive into Cardiff / to Cardiff station- - which is defeating the object. There are steep steps at Dinas and Eastbrook, particularly Eastbrook with a bridge over the track. This challenging even for the fitter and more able bodied. Few people could or would want to walk or cycle to work. Commuters: working from home has been / continues to be phased out for many. Even so, traffic along Cardiff Road has increased and congestion has increased, since the new developments in Dinas.
18. The proposed active travel routes are also not viable- take as an example the lane leading to Powys Close, which is mainly banked by walls around private property and of varying widths ranging from 110cm, to 140cm to 180cm. There is also a sharp 90 degree turn in the middle of the lane and gradients at each end of the lane, a particularly steep gradient into Powys Close. Two people cannot walk side by side or pass through any part of the lane. Let alone a bike / wheelchair and a person. Cyclists need to dismount and walk their bikes through. Wheelchair users don't use the lane due to its narrow parts and the steep gradient at the Powys Close end. The lane is only suitable for use in the day, its pitch black at night and unsafe and to erect a light would cause light pollution to surrounding properties. Even in the day time, you cannot see from one end of the lane to the other. When you make it to the top of the lane there is a wall requiring a sharpish left turn across a pavement / drive. Powys Close itself is very steep and hazardous in icy weather. Towards the bottom of Powys Close there is a very steep gradient. It is very difficult to cycle or push a pram up it, impossible to use wheelchair and the fittest find it a challenge walking up it. At the other (Seel Park) end of the path there is also a gradient followed by a downhill slalom if travelling towards Highfields. The pavements are not great. The tarmac in the lane is in a bad state of repair and the lane often floods. Garden boundaries have in the past been vandalised and graffiti has been drawn on the walls. Criminals have in the past attempted to use the lane as a base (and the police were called). Rubbish has also been dumped in the lane and people (including refuse workers) have used the lane as a toilet. The alternative active travel route is not without its issues either, including steep gradients from Chapel Close and up towards Seel Park. Both routes would involve travel alongside Cardiff Road and to crossing Cardiff Road. From Powys Close, Powys Place onto Cardiff Road the quickest and most used route to the Murch shops and Ash Path to St Cyres school is to cross the busy Cardiff road weaving in between the traffic and crossing the railway line (walking up to the pedestrian crossing by the Murch infants school would add on 20 minutes easily and is not a direct route and the crossing by chapel close leads to the Eastbrook station bridge which is not accessible). Its not particularly safe. I believe that, certainly the proposed active travel route through the lane from Highfields / Seel Park to Powys Close and down towards Cardiff Road, falls within the red category, when looking at appendix H of the Active travel route guidance.
19. Our medical centre is already finding it challenging to cope with the number of patients and the needs of its patients.
20. Local Primary and Senior schools are oversubscribed too. If children are required to attend schools out of the area they will need to (1) secure a place (which is usually challenging); and (2) travel to get there.
21. There are no shops within reasonable walking distance of Eastbrook. It would take a good 20 to 25 minutes to walk briskly to the shops / amenities at the Murch or the village and the pedestrian access is poor and dangerous in parts. Adding traffic lights / pedestrian crossings will add to the traffic congestion.

Change suggested by respondent:

Has it not been possible / deemed appropriate to extend the statutory 6 week consultation period? Would it not be appropriate to repeat it? 6 weeks has been insufficient for this consultation

Sound: No

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/36p

6887 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mrs Kay Shaw [2243]

Summary:

1) Why have the Vale Council made the form online so hard to navigate and fill in out objections to the proposed build up in Eastbrook. I believe it was deliberate so that many people give up
4) I believe that the independent examination will be carried out by PEDW.

Full text:

1) Why have the Vale Council made the form online so hard to navigate and fill in out objections to the proposed build up in Eastbrook. I believe it was deliberate so that many people give up.
2) The traffic congestion through Dinas Powys especially Eastbrook, a new built can possibly add another 500 cars causing even more disruption. I have heard that there will be another set of traffic lights before the Merrier Harrier lights, which will cause more chaos. What about the emergency vehicles ie: paramedics, ambulance and fire services???
3) The risk of flooding. Dinas Powys was flooded in 2020 flood prevention measures have not been taken into account. These fields are practically impossible to navigate during winter months because of standing water on the fields-where will this water go if houses are built here-down into Cadoxton river cause more flooding.
4) I believe that the independent examination will be carried out by PEDW.
5) These houses are supposedly being built because of the active travel route-the Eastbrook station is totally inadequate especially for disabled persons, elderly and mothers with pushchairs at prams.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Paper Representation Redacted - https://valeofglamorgan.oc2.uk/a/3cr

6764 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mrs Mary Vincent [2657]

Summary:

Others within our group, with far better digital skills than I have tell me that the data they offer is flawed and often self-contradictory. And it is here, that the real nub of our complaints becomes apparent. The quantity, complexity, inaccessibility and sheer chaotic organisation of the online consultation process makes it well-nigh impossible for the average resident to navigate and respond to. We struggle to ‘read’ or understand the thousands of pages of graphs and text. It is dispiriting and the cause of significant distress. In truth it is an information dump rather than a consultation. This makes a mockery of democracy and fairness.

Full text:

Further to our conversation I am writing to ask if you can raise the concerns we spoke of regarding the ´Housing Growth in Barry' consultation document to the Sennedd. As you know, we and a large number of residents in this north west area of Barry are very concerned about the ramifications that will ensue from a development of 370 new houses opening onto the already gridlocked Weycock Roundabout. This ´pinch point' lies on a main route between emergency services (fire, ambulance and police) and the airport. Who in their right mind would put further pressure here?

TRAFFIC and AIR POLLUTION
will increase exponentially and the measures the council and developer are proposing will not properly address them. Extra (very narrow) lanes entering the roundabout and a few traffic lights will not stop the gridlock. In fact they could increase it. The backups would extend beyond the lengths of Pontypridd Road, Port Road and 'Five mile Lane'. They already do - quite frequently - at the slightest traffic hiccup. Despite the council's assertion that public transport is available, there is none from the roundabout to and from the railway station or town centre. They assert that there are buses. This is not true. If they can lie about this patent untruth, how can we trust any of their or the developer's 'studies'. Inevitably the new residents would use their cars to access all services, and walking or cycling from Weycock Cross to station or shops and back is not really feasible. It is a big climb back, and very few residents are capable of it.
The same lack of clear vision and honesty is true for the 'mitigation packages' proposed on other matters of serious concern to us:

SERVICES
GP and dental services are already at over capacity in our area. If health and wellbeing are important to this Labour administration, then increasing the load on overstretched services that we all know will not have capacity to meet that demand, would seem cavalier. There will also be need for a considerable number of school places, and those children will need to get to and from school. Secondary schoolchildren can walk if they can safely cross the roads. Traffic lights to enable this will of course cause even longer delays for road traffic. There are no easy answers. For primary pupils it is not walkable. This will mean more cars on the road at extremely busy times.

DRAINAGE and SEWERAGE for Pontypridd Road, St James Crescent and Nant Talwg Way is already inadequate, and tarmacking over a large area of 'Green Wedge' which currently helps to drain the heavier rains caused by climate change, will make things worse. Many of us already experience foul smells at times. The system is already failing.

The chosen developers, Persimmon, have shown themselves to be untrustworthy in honouring contracted commitments, as seen in relation to their buildings on the Barry Waterfront. They also have a dismal record on the quality of their construction countrywide. It is widely reported as shoddy. How can it be responsible for a Labour administration to even consider entrusting them not to cause real damage on what is a very sensitive site?

ECOLOGY and BIODIVERSITY
The arguments the council puts out for abandoning the Green Wedge at north west Barry would seem to be spurious, formulated to justify their own backtracking on the reasons upheld for the Wedge in 2015. The loss of green space that housing and hardcore will replace is unforgivable. There will be less uncovered land to drain the increasing heavy rainfall. The impact on biodiversity will also be felt. Loss of habitat is a main reason for the drastic decline in wildlife species countrywide. Bats, field mice, otters, owls, raptors, wood pigeons and skylarks inhabit these fields. Swallows skim them in summer for the plethora of insects. Wrens and other small birds nest in the scrub and hedges surrounding them. From my garden I hear the songs of robins, wood pigeons, blackbirds, dunnocks, tits and goldfinches. Skylarks nest in them all through spring and summer, their songs lifting up into the air above us as they rise. These are endangered red-listed birds. THIS is biodiversity. These Green Wedge fields act as a wildlife corridor, (essential for successful breeding and survival) between the country park and the further landscape. Take it away and it is gone for good. Yet more numbers of species will be lost. Wildlife is not just a luxury. It is the web that supports the health and wellbeing of all creatures on this earth, ourselves included.
(For me, as an artist and a gardener this aspect is close to my heart. Landscape, vegetation and wildlife are key inspirations.)

CONSULTATION
Others within our group, with far better digital skills than I have tell me that the data they offer is flawed and often self-contradictory. And it is here, that the real nub of our complaints becomes apparent. The quantity, complexity, inaccessibility and sheer chaotic organisation of the online consultation process makes it well-nigh impossible for the average resident to navigate and respond to. We struggle to 'read' or understand the thousands of pages of graphs and text. It is dispiriting and the cause of significant distress. In truth it is an information dump rather than a consultation. This makes a mockery of democracy and fairness.

I know this is a strong message, and I don't enjoy having to write it. I and many of my neighbours, who are long time Labour voters, feel betrayed by Labour. This is desperately sad. It's not the fact that they want to build more housing, we know that is needed, but this is not the right place for it, not for us, or the future people who would live in it. But most of all it is about how the council is so dismissively treating us.

Change suggested by respondent:

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Sound: Not specified

Attachments:
Email representation redacted - https://valeofglamorgan.oc2.uk/a/37p

6947 Comment

Document Element: What Will Happen After the Consultation?
Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

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

Full text:

Penarth Town Council Deposit RLDP Consultation Response

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

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

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

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

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

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

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

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

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

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

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

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

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

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and

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

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

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

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

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

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

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

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

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

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

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

Footnotes

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

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

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

Change suggested by respondent:

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Sound: Not specified

Attachments:

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

7027 Object

Document Element: What Will Happen After the Consultation?

Respondent: Mrs susan edwards [3222]

Summary:

I have had great difficulty in downloading the forms from your website which is extremely complicated and not user friendly.

Full text:

I am writing to oppose the development of houses in the field behind Maes Lloi, Aberthin for the following reasons.

1 The proposed access onto the main road through Aberthin will add to an already dangerous stretch of road which has heavy traffic,. The volume of traffic has increased considerably over many years mainly due to the building of hundreds houses in Ystradowen and beyond. More houses are also proposed in that village which will produce even more traffic cutting through Aberthin to Cowbridge and up to the A48 via Penylan Road which is a dangerous lane.

This access problem was recognized many years ago when The Spinney was built and the old entrance to Skaife House was closed off. A pedestrian crossing has not been allowed due to the very sharp bend in the village around the Farmers Arms which makes crossing the road very hazardous.

2. The field to be developed is on the flood plain which could lead to flooding of the existing houses.

3. The development adjoins the conservation area and will be detrimental to the aspect from it.

I have emailed you as I have had great difficulty in downloading the forms from your website which is extremely complicated and not user friendly

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/tv3

7217 Object

Document Element: What Will Happen After the Consultation?

Respondent: Professor Andrew Vincent [920]

Summary:

Vale Planning in fact have a public duty of care for local residents, namely, to minimally help and facilitate public understandings of the issues. Sadly they entirely failed in this basic responsibility. Intentionally or not Vale Planning quite literally dumped thousands of pages of overly technical documents on the website with little or no regard, guidance or clear pathways for ordinary readers, which is an unforgivable administrative lapse. This makes the whole consultation process largely inaccessible to ordinary folk and those who have limited digital skills or limited time due to responsibilities. In point, for those with limited digital skills, the online RLDP offends against basic principles of natural justice. It is intrinsically discriminatory against those who found it impossible to navigate.

Full text:

There is sadly nothing sustainable, vibrant or inclusive in the RLDP. It is a confusing dystopian vision. The RLDP is an immensely clumsy, badly-designed, overlong and ill-organized entity. Vale Planning in fact have a public duty of care for local residents, namely, to minimally help and facilitate public understandings of the issues. Sadly they entirely failed in this basic responsibility. Intentionally or not Vale Planning quite literally dumped thousands of pages of overly technical documents on the website with little or no regard, guidance or clear pathways for ordinary readers, which is an unforgivable administrative lapse. This makes the whole consultation process largely inaccessible to ordinary folk and those who have limited digital skills or limited time due to responsibilities. In point, for those with limited digital skills, the online RLDP offends against basic principles of natural justice. It is intrinsically discriminatory against those who found it impossible to navigate.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None