VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

Volume 7 – Full Representations on Background Papers

August 2026

RLDP CDLN

VALE of GLAMORGAN BRO MORGANNWG

@VOGCouncil Vale of Glamorgan Council LDP@valeofglamorgan.gov.uk 01446 704681 www.valeofglamorgan.gov.uk

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 It also excludes representations that have been withdrawn.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.

7064 Object

Document Element: Background Papers, BP9A Updated Housing Land Supply and Trajectory
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:
Barratt Redrow raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory. Medium-sized sites in sustainable locations can provide resilience to the housing trajectory.
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.

Full text:
Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.

Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations

currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale

of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.

This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.

A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to

demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan’s supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan’s effective provision.
The Deposit Plan’s own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of

course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

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

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

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

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

Policy SP4 – Placemaking

Position: Support in principle / Comment

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

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

Suggested wording amendment:

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

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

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

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and

well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.

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

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

Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.

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

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

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

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

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

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

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

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

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

Deposit Plan Conclusion

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

In particular:

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

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

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

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

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

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

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both

recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.

• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

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

7065 Comment

Document Element: Background Papers, BP9A Updated Housing Land Supply and Trajectory
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:
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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

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

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

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

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

Policy SP4 – Placemaking

Position: Support in principle / Comment

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

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

Suggested wording amendment:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Deposit Plan Conclusion

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

In particular:

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

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

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

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

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

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

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

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

Candidate Site Register - Site ID 486

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

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

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

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

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO_2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site

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

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

7039 Object

Document Element: Background Papers, BP9A Updated Housing Land Supply and Trajectory
Respondent: Marion morgan [2413]
Agent: Geraint John Planning Ltd

Summary:
We object to the Trajectory in its current form accordingly.
The timescales set out in the Housing Trajectory are considered to be fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that re currently being incurred for planning applications submitted for major housing sites across Wales and do not allow for any 'slippage' during the development management process.
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan and raises concerns regarding the soundness of the trajectory and delivery of sites. There is no clear evidence as to how the level of completions can be achieved let alone guaranteed.
It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036.
The evidence shows that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Full text:
ANNEX 1
Preface

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

The representations are structured into the following sections:

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

SECTION 1. Response to the Deposit Plan

Distribution of Growth

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

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

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

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

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

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

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

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

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

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically 'rural', and as such,

there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

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

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

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

Housing Supply

RLDP Allocations - Key Sites

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

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

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

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

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

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

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing

formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

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

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

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

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

Windfall Sites

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

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

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

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

St Athan Train Station

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

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

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

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

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

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

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

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

Rolled forward LDP Sites

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

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

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

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

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

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be

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

Housing Delivery Rate Assumptions

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

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

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

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

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

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

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

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

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing

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

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

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

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

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

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

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

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

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

Securing further delivery of Affordable Units

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

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

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID 430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and

2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

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

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

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

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

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

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

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

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

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

Deliverability of the Site

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

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

In summary, the site promoters:

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

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

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

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

Land at Ystradowen (Site ID: 4060)

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

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

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

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

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

allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

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

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

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

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

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

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

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

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

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

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

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is

also served by public transport, although this is relatively infrequent."

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The second section/paragraph of the assessment states:

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

Authority, there is “a need for 230 additional affordable units over the next 15 years”. It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

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

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

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

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

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

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

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

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

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

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

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

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

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

Summary and Conclusion

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

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

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

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

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

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

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

Summary of These Representations

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

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

Preface

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

1. Procedural Consultation Matters;

2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

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

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

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

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

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

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

Timing Assumptions underpinning the Trajectory

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

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

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

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A

wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

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

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

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

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

Housing Delivery Rate Assumptions

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

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

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

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

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19)

pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

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

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

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

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

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

Status & Standing of Sites included in the Trajectory

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

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

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

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

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

period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

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

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

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

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

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

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

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

St Athan Train Station

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

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this

location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

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

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a

substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

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

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

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

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

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

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

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

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. 'Land West of Maendy Road, Aberthin' causing "unacceptable harm to the important landscape of the area" will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

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

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

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7139 Object

Document Element: Background Papers, BP9A Updated Housing Land Supply and Trajectory
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

We object to the Trajectory in its current form accordingly.
The timescales set out in the Housing Trajectory are considered to be fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that re currently being incurred for planning applications submitted for major housing sites across Wales and do not allow for any 'slippage' during the development management process.
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan and raises concerns regarding the soundness of the trajectory and delivery of sites. There is no clear evidence as to how the level of completions can be achieved let alone guaranteed.
It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036.
The evidence shows that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Full text:

ANNEX 1
Preface

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

The representations are structured into the following sections:

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

SECTION 1. Response to the Deposit Plan

Distribution of Growth

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

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

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

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

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

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

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

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

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

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

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

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

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

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

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on

the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

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

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

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

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

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

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

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

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

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

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

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

Windfall Sites

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

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

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

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

St Athan Train Station

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

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

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

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

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

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

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

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

Rolled forward LDP Sites

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

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

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

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

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

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

Housing Delivery Rate Assumptions

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

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

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

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

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be

achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

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

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

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

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

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

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

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

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

- Cowbridge Comprehensive School;
- St Nicholas Primary School;
- Cowbridge Health Centre; and
- Cowbridge town centre for various Retail Services.

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

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

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an

Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

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

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

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

Deliverability of the Site

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

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to

play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

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

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

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

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.
Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.
The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is

unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that “There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing” is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site’s classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the ‘scoring’ system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from ‘red’ to ‘amber’ for ‘Developer Interest’. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria’s to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for ‘Developer Interest’ has changed from ‘red’ to ‘amber’. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, ‘amber’ refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links,

these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

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

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

Preface

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

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

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

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

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;

• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston.

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

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

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

Timing Assumptions underpinning the Trajectory

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

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

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

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

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

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

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

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery

start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

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

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

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

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

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;

• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

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

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

Status & Standing of Sites included in the Trajectory

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

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

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

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

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

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

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

Key Sites

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

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the

average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

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

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

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

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

St Athan Train Station

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

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

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

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

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

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) –

means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

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

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

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7161 Object

Document Element: Background Papers, BP9A Updated Housing Land Supply and Trajectory
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

We object to the Trajectory in its current form accordingly.
The timescales set out in the Housing Trajectory are considered to be fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that re currently being incurred for planning applications submitted for major housing sites across Wales and do not allow for any 'slippage' during the development management process.
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan and raises concerns regarding the soundness of the trajectory and delivery of sites. There is no clear evidence as to how the level of completions can be achieved let alone guaranteed.
It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036.
The evidence shows that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Full text:

ANNEX 1
Preface

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

The representations are structured into the following sections:

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

SECTION 1. Response to the Deposit Plan

Distribution of Growth

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

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

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

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

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

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

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of

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

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

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

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

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

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

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

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

Housing Supply

RLDP Allocations - Key Sites

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

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

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

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

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

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

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

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

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

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

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

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

Windfall Sites

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

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

• Allocated sites (3,521 units)

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

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

St Athan Train Station

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

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

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

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

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

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

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

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

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute

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

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

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

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

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

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

Housing Delivery Rate Assumptions

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

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

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

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

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

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

quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

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

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

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

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The

contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

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

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

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

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

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

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

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

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

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

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

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy."
It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

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

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

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

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

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

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

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

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the

pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

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

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

Preface

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

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

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

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

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

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

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing

trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

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

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

Timing Assumptions underpinning the Trajectory

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

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

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

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

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

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

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

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

Housing Delivery Rate Assumptions

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

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

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

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

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least

sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

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

Status & Standing of Sites included in the Trajectory

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

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

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

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

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

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

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

Key Sites

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

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

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which

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

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

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

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

St Athan Train Station

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

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

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

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already

seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

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

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October

2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

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

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

5616 Object

Document Element: Background Papers, BP14A Strategic Transport Assessment – Stage 2

Respondent: Mrs Carys Atter [3312]

Summary:

The plan for transport and traffic needs completely looked at again. First traffic counting is taking place at midday meaning this isn't true representation of rush hour. The impact the traffic has coming out to Waycock Roundabout leads onto the traffic movement to the M4. Pendolyn lanes are blocked daily and culverhouse cross had been marked as the busiest roadabout and VOG are still building in the surrounding areas before improvements are made.

Full text:

The plan for transport and traffic needs completely looked at again. First traffic counting is taking place at midday meaning this isn't true representation of rush hour. The impact the traffic has coming out to Waycock Roundabout leads onto the traffic movement to the M4. Pendolyn lanes are blocked daily and culverhouse cross had been marked as the busiest roadabout and VOG are still building in the surrounding areas before improvements are made.

Attachments: None

6367 Comment

Document Element: Background Papers, BP14A Strategic Transport Assessment – Stage 2

Respondent: Mr marcus longley [3382]

Summary:

There is a need to fix the safety issue at the Merrie Harrier junction.

Full text:

I support building houses between Dinas Powys and Llandough - there is a chronic housing shortage. But apart from this, there is also a need to fix the safety issue at the Merrie Harrier junction (Im commenting here because i couldnt work out how to comment at the replacement ldp location)

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tj8

4720 Comment

Document Element: Background Papers, BP14A Strategic Transport Assessment – Stage 2

Respondent: Mr Roger Pattenden [1474]

Summary:

The Strategic Transport Assessment highlights significant traffic capacity issues at key junctions in the Dinas Powys area, worsened by proposed housing developments. Mitigation measures are only thought doable for J12 albeit this would increase traffic through Dinas Powys old village. Large-scale solutions, like a Dinas Powys bypass, are needed but have not been pursued. The Council's focus on Active Travel as a panacea has not resulted in measures to meaningfully alter modal shift. I suggest housing approvals should be delayed until adequate transport infrastructure is in place or in progress to prevent worsening traffic congestion and its adverse economic impact.

Full text:

My comments on the RLDP concern the Strategic Transport Assessment – in particular regarding the road junctions with the greatest impact on traffic within and through Dinas Powys.
Technical Note 06 assesses that the following junctions will reach or become over capacity during the Plan period following implementation of the proposed strategic housing developments:-
• J7 - A4231/A4055 Cardiff Rd / B4267 Sully Moors Rd (McDonald's roundabout).
• J9 - Penlan Rd / Barry Rd / Andrew Rd / Cardiff Rd / Redlands Rd (Merrie Harrier junction)
• J10 - Penarth Rd / Cogan Spur / Windsor Rd / Barry Rd (Baron's Court junction)
• J12 - Leckwith Rd / Pen-Y-Turnpike Rd.
Technical Note 07 aims to identify conceptual mitigation measures for restoring traffic at these junctions to acceptable levels. However, the Note 07 Summary reveals that such measures which are proportionate are only possible for J12. Of course, if the capacity (and safety) of J12 is improved, more traffic is likely to use Pen-Y-Turnpike which would result in more traffic through the old village of Dinas Powys.
For junctions J7, J9 and J10, Note 07 states that the extra traffic from the proposed RDLP strategic housing developments would be only a small proportion of the over capacity traffic and that only large-scale mitigation measures would be effective.
In order to alleviate congestion at those junctions, Note 07 recommends that the Vale Council continues to pursue regional scale interventions with Cardiff Capital Region (CCR) and Transport for Wales)TfW). But what has that achieved to date?
This assumes that the Council will follow that recommendation and that such interventions will result in the larger scale mitigation measures required.
But, given that, in the Dinas Powys area in recent history, no significant measures to mitigate traffic congestion have been proposed by the Vale Council let alone implemented, the assumption that somehow such measures will happen is surely wishful thinking.
The Vale Council have long trumpeted Active Travel as the panacea to increasing traffic but what significant steps have the Council taken (e.g. a cycle path between Dinas and Barry) to enable even a modest modal shift?
Without larger scale mitigation measures (for example a Dinas Powys By-Pass), the present traffic congestion situation will only get worse exacerbated by the proposed strategic housing developments.
It is not disputed that extra housing is desirable but shouldn't the granting of planning permission for those developments be contingent on adequate facilities and infrastructure being provided either by the Developer, the Council or the Government?
Is the Council giving a higher priority to meeting government housing targets than to providing or facilitating the infrastructure to enable the local economy to function efficiently.
A future scenario of ever worsening traffic congestion and its adverse impact on the local economy should be a reason for delaying further housing development until adequate larger scale improvements to the transport infrastructure are made or at least in progress.
Roger Pattenden BSc MICE

Attachments: None

5172 Comment

Document Element: Background Papers, BP15 Renewable Energy Assessment

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

Summary:

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.

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?

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

6209 Comment

Document Element: Background Papers, BP21 South East Wales – Strategic Flood Consequence Assessment (Stage 1)
Respondent: Mr Colin Arnold [2871]

Summary:

There is obvioulsy a lot more work that needs to be done after the consulation closes but one specific stands out for me. In the RLDP there is acknowledgement that there is a need for a Flood Alleviation Scheme for Llanmaes. This is commented on more than once but there are no specific proposals or any outline as to how any proposals or actions will come into being on this point.

Full text:

There is obvioulsy a lot more work that needs to be done after the consulation closes but one specific stands out for me. In the RLDP there is acknowledgement that there is a need for a Flood Alleviation Scheme for Llanmaes. This is commented on more than once but there are no specific proposals or any outline as to how any proposals or actions will come into being on this point.

Attachments: None

6240 Object

Document Element: Background Papers, BP21 South East Wales – Strategic Flood Consequence Assessment (Stage 1)
Respondent: Barry & Vale Friends of the Earth [708]
Agent: Barry & Vale Friends of the Earth

Summary:

The statutory Section 19 report on the 23 Dec2020 flooding of about 100 properties included recommendations that have been ignored, relating to blockage during high river levels of highway drains from central streets and of the Cae'r Odyn's newer street drains.

The Strategic Flood Consequences Assessment omits mention of that flood episode (1:20yr rainstorm) and omits mention of the need for measures to cope with stronger rainstorms(1:100). We guess that omission was not due to the consultant JPA who has professional standards to maintain, but to the LPA or RLDP team. Whichever, it fails to comply with
3.4 The SFCA is a desk-based study which collates existing information to undertake a broad assessment of potential flood risks across the study area, including the Vale of Glamorgan, from all sources of flooding. The study identifies areas at potential high risk from flooding, provides details of historical flood events, and detail of any flood risk management structures or procedures present.
The SFCA fails to mention the Dec.2020 flooding, the 2021 Section 19 report on it with unfulfilled recommendations and NRW's conclusion from ~2018 to not proceed with dam/holding reservoir upstream but "working with nature" with catchment measures. JPA Consulting wrote both the Section 19 report and this SFCA. It's likely not JPA but the RLDP team omitted this important information, because of their interest in promoting the site for housing. Whichever, the SFCA is a statutory document that requires completing to professional standard.

The SFCA does identify priority areas for natural flood management. In this regard, the SFCA (9.3.6.10) identifies small areas across the Vale that are suitable for runoff attenuation and large portions of the Vale that are suitable for wider catchment woodland planting… (Appendix J1 of the SFCA). We find a map on p.153 Working with Natural Processes - Potential Mapping (JPA + VoG Dec.2021) show Woodland Planting on this hillside, including part of the Persimmon site.

The fields below Llandough Hospital are an important part of the East Brook catchment. Drainage from the Hospital discharging into the East Brook (via settlement tanks) increased over the last decade by large area carparking and building developments.

The development site and adjacent hillside fields are a significant holding area for rainstorms, soakaway being slow. Housing development with normal SuDS measures with "attenuation ponds" will speed up storm-discharges. The issue is not as the KS2 spec says Small area <5% affected by river flooding, but the the downstream consequencies of the development in flooding at the Murch cross-road and adding to the river Cadoxton just downstream.

The applicant has no given any study to include measures to trap the stormwater in holding ponds, or otherwise to increase delays to it reaching the East Brook. He has concealed the proposal for woodland planting on part of the site as the SFCA map indicates.

The strong flooding constraint is also being hidden by the RLDP people, if it's they who have censored important material from the JPA report.

We require a revised statutory SFCA is issued to professional standard which properly includes both the 2021 Section 19 report and proposals for forward policy towards flooding measures for Dinas Powys itself. These would be oriented to "working with nature" as agreed, and recognize that the Eastbrook housing development goes in the wrong direction. They would also record the need to divert highway drainage from discharges into the Cadoxton as per the Section 19 recommendations.

Full text:

Safeguarding against flooding has to be the priority for any development in Dinas Powys. The strategic Flood Assessment report's omission of setting such a requirement is unacceptable. The Section 19 report on the 23 Dec2020 flooding of about 100 properties produced recommendations that have been ignored, relating to blockage during high river levels of highway drains from central streets and of the Cae'r Odyn's newer street drains. The omission of that flood episode (1:20yr rainstorm) and reporting need for measures to cope with stronger rainstorms(1:100) seems not due to the consultant JPA but to the LPA or RLDP team.

Attachments:

PolicyPriority-FloodingDPowys RLDP Foe 11 Mar'26.doc - https://valeofglamorgan.oc2.uk/a/tdv

7237 Comment

Document Element: Background Papers, BP21 South East Wales – Strategic Flood Consequence Assessment (Stage 1)

Respondent: Mrs Julie Garvey [3578]

Summary:

Llanmaes Village currently suffers from flooding and a flood alleviation scheme is desperately needed.

Full text:

The conservation /green wedge between Llantwit Major and Llanmaes must be kept to protect the countryside and separate a village and a town.
The village currently suffers from flooding and a flood alleviation scheme is desperately needed. Further development of the village would be disastrous.
The proposal of a supermarket would be detrimental to a village and the infrastructure could not cope with increased traffic and heavy goods vehicles delivering to the supermarket.

Attachments:

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

7239 Comment

Document Element: Background Papers, BP21 South East Wales – Strategic Flood Consequence Assessment (Stage 1)

Respondent: Mrs Janet Harris [1846]

Summary:

There is a desperate need for not just a flood alleviation plan, but action to protect the residents of Llanmaes from the continuing effects of flooding in the area. More properties have been affected this year. Recently our own 400-year-old property, which has never been previously affected was subjected to a backlog of sewage from the main sewer in the road on which we live. Fortunately, a manhole on our drive gave way under the pressure, releasing water and sewage down the road. Otherwise, like other properties in the village we would be at risk of the property itself flooding with sewage.
I would call upon both the Vale of Glamorgan Council and the Welsh Government to come up with a coherent, joined up plan and solution to this long running problem and implement it with urgency.
No building should be allowed in the village until a solution has been completed, there is too much risk to existing properties.

Full text:

As a resident of the village of Llanmaes for the last 37 years, I would like to make the following comments:
Flood Alleviation
There is a desperate need for not just a flood alleviation plan, but action to protect the residents of Llanmaes from the continuing effects of flooding in the area. More properties have been affected this year. Recently our own 400-year-old property, which has never been previously affected was subjected to a backlog of sewage from the main sewer in the road on which we live. Fortunately, a manhole on our drive gave way under the pressure, releasing water and sewage down the road. Otherwise, like other properties in the village we would be at risk of the property itself flooding with sewage.
I would call upon both the Vale of Glamorgan Council and the Welsh Government to come up with a coherent, joined up plan and solution to this long running problem and implement it with urgency.
No building should be allowed in the village until a solution has been completed, there is too much risk to existing properties.
Retail - Land at Bridge Farm House site ID 379 Proposal Number SP12(2)
This proposed development, currently subject to a 'Call In' by the Welsh government is at clashing odds with the village and rural community setting of Llanmaes. The large store and supporting structures and developments would be significant intrusions into the countryside and would result in the physical and visual coalescence of a small rural village with the town of Llantwit Major. It represents a significant intrusion into the countryside, is at odds with the proposal of a green wedge to protect the rural setting of the village and would be clearly detrimental to the Llanmaes Conservation Area. It is outside the RLDP's Strategic Growth Area.
Green Wedge/Conservation. Land Between Llantwit Major and Llanmaes Site D436 Proposal Number DNP2(6)
I would strongly support the proposal for a 'green wedge' for the land between the village of Llanmaes and the Llantwit major bypass, but this should also include the land currently under proposal for the above retail development site. This would protect this land from further hostile development proposals, protect the intrusion into the countryside and the setting of the Llanmaes Conservation Area and protect the village against physical and visual coalescence with a town, protecting its rural and village character. It would protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.
I would be grateful if these comments could be duly noted and considered.

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/t9p

7236 Comment

Document Element: Background Papers, BP21 South East Wales – Strategic Flood Consequence Assessment (Stage 1)

Respondent: Mr Noel Harris [2148]

Summary:

Flood Alleviation
There is a desperate need for not just a flood alleviation plan, but action to protect the residents of Llanmaes from the continuing effects of flooding in the area. More properties have been affected this year. Recently our own 400-year-old property, which has never been previously affected, was subjected to a backlog of sewage from the main sewer in the road on which we live. Fortunately, a manhole on our drive gave way under the pressure, releasing water and sewage down the road. Otherwise, like other properties in the village we would be at risk of the property itself flooding with sewage.
I would call upon both the Vale of Glamorgan Council and the Welsh Government to come up with a coherent, joined up plan and solution to this long running problem and implement it with urgency.
No building should be allowed in the village until a solution has been completed, there is too much risk to existing properties.

Full text:

Green Wedge/Conservation. Land Between Llantwit Major and Llanmaes Site D436 Proposal Number DNP2(6)
I would strongly support the proposal for a 'green wedge' for the land between the village of Llanmaes and the Llantwit major bypass, but this should also include the land currently under proposal for the above retail development site. This would protect this land from further hostile development proposals, protect the intrusion into the countryside and the setting of the Llanmaes Conservation Area and protect the village against physical and visual coalescence with a town, protecting its rural and village character. It would protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.
Flood Alleviation
There is a desperate need for not just a flood alleviation plan, but action to protect the residents of Llanmaes from the continuing effects of flooding in the area. More properties have been affected this year. Recently our own 400-year-old property, which has never been previously affected, was subjected to a backlog of sewage from the main sewer in the road on which we live. Fortunately, a manhole on our drive gave way under the pressure, releasing water and sewage down the road. Otherwise, like other properties in the village we would be at risk of the property itself flooding with sewage.
I would call upon both the Vale of Glamorgan Council and the Welsh Government to come up with a coherent, joined up plan and solution to this long running problem and implement it with urgency.
No building should be allowed in the village until a solution has been completed, there is too much risk to existing properties.

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3j5

6337 Comment

Document Element: Background Papers, BP21 South East Wales – Strategic Flood Consequence Assessment (Stage 1)

Respondent: Richard Leach [3544]

Summary:

The deferred flood alleviation scheme for Llanmaes affected our land in Siginstone lane. The RLDP mentions this scheme several times but no response has been forth coming. The village floods and for many many years. The council and the Welsh government have put in funding to solve this but nothing has yet happened. Indeed in the RLDP it is mentioned extensively that the village floods but we cannot see what specific directions have been made to resolve this problem. I urge the Vale council to liaise with the Welsh government about bringing this forward and mention in the deposit plan.
I appreciate that the costs of the plan increased substantially with the fuel costs of the Ukraine war and probable is increasing again. However, parts of the plan, reprofiling the road and channeling flood water away from housing could have made a difference without the extensive earth works in fields referred too above. If my suggestion of extensive tree planting in above fields instead of bunds and channels had been implemented the risks may already be reduced.

Full text:

I attended the consultation at CF61 about the RLDP and was advised to write to you with my comments.

I was pleased to see that in the RLDP that the fields adjacent to the LLantwit Major Bypass (site ID 436 Proposal number DN2(6) is designated as a Green wedge That application was made by our Community council and I fully support this proposal. the reasons they gave and I agree with this , are that protection of the open country side, protects against the coalescence of the town and our rural village, and protects the setting of the conservation area.

I see that the Planning policy has ring fenced the location of the proposed Lidl development (ID 379 Proposal number SP12(2) that is currently called in by the Welsh government . You will be aware that the Planning committee voted against the recommendation of the planning officer. when they made there decision, that is now being challenged as procedurally against a lot of Vale and Welsh Government policies. Looking forward to this site being included in the green wedge when this ridicules decision is over turned

I note with interest that several fields to the north east of Llanmaes have been designated as potential solar farm sites. These very fields are partially responsible for the flooding risk in Llanmaes. I suspect that solar farms would not help this problem.

The deferred flood alleviation scheme for Llanmaes affected our land in Siginstone lane. The RLDP mentions this scheme several times but no response has been forth coming. The village floods and for many many years The council and the Welsh government have put in funding in 2023, the Welsh government allocated £3,090,855 and in 24/25 £16,000 to solve this. Nothing has yet happened, indeed in the RLDP it is mentioned extensively that the village floods but we cannot see what specific directions have been made to resolve this problem. I urge the Vale council to liaise with the Welsh government about bringing this forward and mention in the deposit plan.
I appreciate that the costs of the plan increased substantially with the fuel costs of the Ukraine war and probable is increasing again. however parts of the plan , reprofiling the road and channeling flood water away from housing could have made a difference without the extensive earth works in fields referred too above. If my suggestion of extensive tree planting in above fields instead of bunds and channels had been implemented the risks may already be reduced.

Attachments:

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

6675 Comment

Document Element: Background Papers, BP21 South East Wales – Strategic Flood Consequence Assessment (Stage 1)

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

Summary:

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).

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).

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

7028 Comment

Document Element: Background Papers, BP21 South East Wales – Strategic Flood Consequence Assessment (Stage 1)
Respondent: Mrs Bethan Pocock [3268]

Summary:

Flood Alleviation
The need for a flood alleviation scheme for Llanmaes is acknowledged on several occasions in the Deposit Plan , thugh unfortunately there are no specific proposals. Having lived in Llanmaes for 7 years, I have whitnessed regular flooding from surface water over the wetter months when the village stream and drains are unable to cope with the volume of water. This water then overwhelms the sewage system in the village resulting in raw sewage flooding a number of homes as well as the village playing field . This flooding also results in road flooding in at least 3 places around the village lanes. This has become an annual occurance, and despite intervention from Welsh Water , the situation has not been resolved. A Welsh Government grant for an alleviation scheme has to date not been implimented and this scheme needs to be revived for the safety of the village residents.

Full text:

Retail - Land at Bridge House Farm Site ID 379 Proposal Number SP12(2)
In 2022 LIDL submitted a planning application for a supermarket on a parcel of land which had in the past been part of Bridge House Farm. The farmhiuse itself had stood vacant for a number of years until it was recently purchased and is being restored as a family home.
The application attracted a great dea of concern and objetions based on the fact that this development would result in both visual and physical coalescence between Llanmaes and Llantwit Major. Its entrance would be directly off the main access lane to Llanmaes, close to the main road junction,managed by traffic lights and pedestrian crossing.
The planners at the Vale of Glamorgan recommended refusal of this application based on the the fact that the site was outside the RLDP's defined strategic growth area and other associated concerns. However at the planning meeting, a small number of Councillors argued in favour of the development , based on the need for ' cheap food', and as such the application was approved. Since this meeting , the application has been referred to PEDW, and their initial assessment that an appeal should be heard, the application has been escalated to a full enquiry at great expense to all parties. This ' cheap food 'option not quite such a special offer after all.
In order to overcome the sitution that this overturning of the planners' recommendation has created, a simple remedy would be for the Welsh Government to offer an alternative site to LIDL . The nearby Northen Access road which was built at considerable cost to the taxpayer for commercial and residential development has easy access, pedestrian and cycle way, together with Bus stops with shelters , though no current bus route. A Win / Win solution.

Flood Alleviation
The need for a flood alleviation scheme for Llanmaes is acknowledged on several occasions in the Deposit Plan , thugh unfortunately there are no specific proposals. Having lived in Llanmaes for 7 years, I have whitnessed regular flooding from surface water over the wetter months when the village stream and drains are unable to cope with the volume of water. This water then overwhelms the sewage system in the village resulting in raw sewage flooding a number of homes as well as the village playing field . This flooding also results in road flooding in at least 3 places around the village lanes. This has become an annual occurance, and despite intervention from Welsh Water , the situation has not been resolved. A Welsh Government grant for an alleviation scheme has to date not been implimented and this scheme needs to be revived for the safety of the village residents.
I trust the comments I have made above will be considered with the seriousness they deserve. Our rural communities deserve to be maintained for the wellbeing not only of the residents, but the environment as a whole. Llanmaes enjoys an abundnace of wildlife which needs to be preserved . Seing a pheasant aongside a woodpigeon crossing the road restores one's faith in our surroundings. Alongside the acres of wheat and corn ,they need those green field sites as do we.

Attachments:

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

5814 Comment

Document Element: Background Papers, BP21A Flooding

Respondent: Mr Paul Garvey [3241]

Summary:

There is a need for flood alleviation in Llanmaes.

Full text:

I live in Llanmaes and three things affect us directly from the RLDP and I'd like to comment on all three, if I may.

The first is the proposed Green Wedge between Llantwit Major and Llamaes. I very much support this proposal and the Llanmaes Community Council and the vast majority, if not all of our village does too. It fits very well with the National Plans for keeping the integrity of our precious Welsh villages. It would keep Lllanmaes safe from development, as per the adopted Management plan.

The second is the proposed retail development at Bridge House Farm It is the set of the proposed Lidl development which has been Called in by the Government. This is totally out of keeping with national plans.

The third is the need for flood alleviation in Llanmaes, Again, this would be much needed.

Attachments: None

5693 Support

Document Element: Background Papers, BP22 Older Persons Housing Strategy

Respondent: Ms Ann Barnaby [1702]

Summary:

I am in support of a Older Persons' Housing Strategy - this should be essential part of any planning application and we should ensure that single level good access dwellings are included as part of the affordable home allocation in the larger developments. In particular where the housing is within good walking distance of local amenities such as the Church Farm development at St Athan. Providing suitable older person homes should free up the larger properties for families.

Full text:

I am in support of a Older Persons' Housing Strategy - this should be essential part of any planning application and we should ensure that single level good access dwellings are included as part of the affordable home allocation in the larger developments. In particular where the housing is within good walking distance of local amenities such as the Church Farm development at St Athan. Providing suitable older person homes should free up the larger properties for families.

Attachments: None

5176 Comment

Document Element: Background Papers, BP23A Best and Most Versatile Agricultural Land

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

Summary:

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.

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?

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

7134 Support

Document Element: Background Papers, BP25 Minerals
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:
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.

Full text:
REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD

1. Introduction

These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.

The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.

The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement

is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that "It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working" and adds that, where sites have been inactive and "there is no prospect of future working", authorities should consider the use of prohibition orders.

That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.

PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that "Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable" and that policies and proposals should cover mineral resources "which are currently used or which may need to be used in the foreseeable future". It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.

The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.

5. National policy context – MTAN1

MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and count these as "dormant reserves" to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture is obtained of permitted reserves "that are likely to have real potential for future working".

That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple "no allocation required" conclusion.

MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.

6. Apportionment and Plan Period

The regional and sub-regional evidence does not undermine the respondent's case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.

BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case

programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.
Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance.
The respondent's case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.
7. BP25 – the Council's own minerals evidence
BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.
Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required." It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: "While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change."
That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent's submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.
BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.
8. SWRAWP Annual Report 2024
The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event "dormant reserves must be counted separately".
That evidence materially supports the respondent's case. It shows that the statement "no further allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant.
Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.
9. Response to the Council's candidate site assessment
The Council's candidate site assessment records that a positive allocation for mineral working is not included because "the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP". That point should be addressed directly.
The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent.
They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.
That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should

reflect “real possibilities for future mineral working” and that prohibition orders are appropriate where there is “no prospect of future working”. MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve “A more realistic landbank assessment”. SWRAWP says that “Caution must be exercised” in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic. Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent’s submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan’s supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

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

10. The existing temporary training permission does not sterilise the reserve

BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.

In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW’s safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.

11. Benefits of continued extraction at Argoed Isha Quarry

Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.

The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.

Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an “important supplier of Carboniferous limestone for general aggregate use”. In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.

The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.

Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.

A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself,

because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.
Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.
The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.
There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect "real possibilities for future mineral working". Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.
12. Restoration, aftercare and biodiversity gain
The respondent's case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.
PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.
Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.
13. Overall conclusion
The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.
PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.
Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.
14. Summary
These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.
 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.
The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed

Isha retains usable reserves and future potential for reworking.
 Policy MIN1 – Mineral Safeguarding Areas: Support.
This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.
That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.
 Policy MIN2 – Quarry Buffer Zones: Support.
The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.
 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
 Policy MIN4 – Sustainable Mineral Working: Support in principle.
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework.
The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

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

7135 Comment

Document Element: Background Papers, BP25 Minerals
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:
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.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD

1. Introduction

These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.

The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.

The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that "It is in the interests of the minerals industry that landbanks reflect

real possibilities for future mineral working" and adds that, where sites have been inactive and "there is no prospect of future working", authorities should consider the use of prohibition orders.
That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.
PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that "Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable" and that policies and proposals should cover mineral resources "which are currently used or which may need to be used in the foreseeable future". It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.
The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.
5. National policy context – MTAN1
MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and count these as "dormant reserves" to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture is obtained of permitted reserves "that are likely to have real potential for future working".
That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple "no allocation required" conclusion.
MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.
6. Apportionment and Plan Period
The regional and sub-regional evidence does not undermine the respondent's case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.
BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.
Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance.
The respondent's case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a

conclusion that the site has no future role.

7. BP25 – the Council's own minerals evidence

BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.

Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required." It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: "While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change."

That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent's submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event "dormant reserves must be counted separately".

That evidence materially supports the respondent's case. It shows that the statement "no further allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council's candidate site assessment

The Council's candidate site assessment records that a positive allocation for mineral working is not included because "the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP". That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve "A more realistic landbank assessment". SWRAWP says that "Caution must be exercised" in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent's submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan's supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

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

10. The existing temporary training permission does not sterilise the reserve

BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.

In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.

11. Benefits of continued extraction at Argoed Isha Quarry

Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.

The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.

Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an "important supplier of Carboniferous limestone for general aggregate use". In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.

The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.

Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.

A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.

Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.

The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.

There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect "real possibilities for future mineral working". Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.

12. Restoration, aftercare and biodiversity gain

The respondent's case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.

PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.

Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.

13. Overall conclusion

The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.

PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.

Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.

14. Summary

These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.

 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.

The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.

 Policy MIN1 – Mineral Safeguarding Areas: Support.

This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.

That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.

 Policy MIN2 – Quarry Buffer Zones: Support.

The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.

 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
 Policy MIN4 – Sustainable Mineral Working: Support in principle.
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework. The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

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

5175 Comment

Document Element: Background Papers, BP25A Minerals Statement of Sub-Regional Collaboration

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

Summary:

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

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
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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?

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

4893 Support

Document Element: Background Papers, BP27 Green Wedges

Respondent: Mrs Linda Green [1072]

Summary:

I support the recommendation for green wedge status on the land between Llanmaes and Llantwit Major for all the reasons given, significantly protecting the village from coalescence with the town. I also note that should the retail application currently under Call In be rejected, this land will be included within the green wedge which I also support

Full text:

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Attachments: None

5179 Comment

Document Element: Background Papers, BP30 Welsh Language

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

Summary:

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 Cymraeg 2050: A million Welsh-speakers.

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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
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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

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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?

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

5685 Object

Document Element: Background Papers, BP31 Open Space

Respondent: Ms Ann Barnaby [1702]

Summary:

My objection is based on a flawed audit of 'green space' due to the inclusion of private golf courses being included in the calculations. Table 8 shows adequate provision of green space in St Athan but if you remove the 22 hectares of the golf course and 1.02 of the school both not freely accessible by the local residents this is reduced to 2.87 hectares or 0.688 of 1,000 population. When you then take into account the 1000 or so houses in the plan there will be a significant shortfall, while the site assessment HG1 KS4,KS5 both state there is adequate in area.

Full text:

My objection is based on a flawed audit of 'green space' due to the inclusion of private golf courses being included in the calculations. Table 8 shows adequate provision of green space in St Athan but if you remove the 22 hectares of the golf course and 1.02 of the school both not freely accessible by the local residents this is reduced to 2.87 hectares or 0.688 of 1,000 population. When you then take into account the 1000 or so houses in the plan there will be a significant shortfall, while the site assessment HG1 KS4,KS5 both state there is adequate in area.

Attachments: None

5066 Object

Document Element: Background Papers, BP31 Open Space

Respondent: Councillor Ian Perry [1040]

Summary:

Please can you recalculate the amount of open space in St Nicholas and Llancarfan following: Removal of churchyards as they are no places for leisure, Removal of the private burial ground, as it is not a place for leisure and inaccessible without a car, Removal of spaces with entrance charges, and land with housing on which are no longer POS and so removed from the document.
The ward is ten miles in length so there is no value in adding up open space as it is often more accessible to residents of other wards. The document contains numerous factual errors.

Full text:

Please would you recalculate the amount of open space in St Nicholas and Llancarfan with the following modifications
• Remove the churchyards – whilst there are large graveyards, they are not places for leisure and there is no seating in many of them.
• Remove the private burial ground – it's not a place for the public to visit for leisure. It's also inaccessible without a car.
• Space with entrance charges should not be included. POS should be free to access.
• Land with private (or affordable) housing on it is no longer Public Open Space. This must be removed from the Open Space document – Bonvilston and Llancarfan.

Given that the St Nicholas and Llancarfan Ward is ten miles in length, what value is derived from adding up all of the open space in such a large ward? Open space within the Ward is often more accessible to the residents of other wards than those in the ward itself.

Why wasn't this document circulated for checking before being made public? Documents like this should not be being published when containing numerous factual errors!

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/sz5

6799 Object

Document Element: Background Papers, BP44 Infrastructure Plan
Respondent: Barry & Vale Friends of the Earth [708]
Agent: Barry & Vale Friends of the Earth

Summary:

The Infrastructure Plan falls short of detailing the new sewerage infrastructure central to unlocking the development of allocated sites stated in para.i Para. 3.104 mentions SuDS to prevent surface water entering the sewer system, but nothing on WW's strategic plan for local authority schemes to divert existing highway drainage into surface water out of their sewers.

Para.3.105 says the obvious that capacity may not exist within the existing sewerage network, but does not include sewage treatment capacity and does not specify where it's lacking. There's a comment for NW Barry that pumping capacity "may"not exist.

Para.3.108 says capacity constraints at treatment works and improvements as being in the current AMP or not, so why not be specific on the programme to 2030 ?

We see no mention of the Vale's Bathing beaches (several new ones) and policy to ensure sewage discharges do not undermine attaining Bathing Water standards; does this issue not belong in the RLDP, setting out divided responsibilities of VoG, NRW and DCWW (cf. Watchtower and Ogmore-by-Sea beaches closed 2024,5)?

Full text:

Thank you for signposting me to the Infrastructure Delivery document. I see this falls short of detailing the new sewerage infrastructure central to unlocking the development of allocated sites stated in para.i
Para. 3.104 mentions SuDS to prevent surface water entering the sewer system, but nothing on WW's strategic plan for local authority schemes to divert existing highway drainage into surface water out of their sewers.
Para.3.105 says the obvious that capacity may not exist within the existing sewerage network, but does not include sewage treatment capacity and does not specify where it's lacking. There's a comment for NW Barry that pumping capacity "may"not exist.
Para.3.108 says capacity constraints at treatment works and improvements as being in the current AMP or not, so why not be specific on the programme to 2030 ?
We see no mention of the Vale's Bathing beaches (several new ones) and policy to ensure sewage discharges do not undermine attaining Bathing Water standards; does this issue not belong in the RLDP, setting out divided responsibilities of VoG, NRW and DCWW (cf. Watchtower and Ogmore-by-Sea beaches closed 2024,5)?

On specifics, KS4 and KS5 say of capacity limits at West Aberthaw works that "DCWW has confirmed that upgrades are planned as part of the AMP8 programme 2025 and 2030". Can you provide documents on this?
WW said in 2015 they "planned" upgrades so questions are obvious - is the W.Aberthaw upgrade still not programmed and committed? Are the plans sufficient to take the much bigger numbers of homes now planned. Will land purchase and planning consent be needed? Will the developers proposing local sites have to pay via S.106?
On Model Farm, WW said the developer would have to undertake a sewerage HMA which L&G have been unwilling to progress, doubtless because their Viability Assessment showed the development was uneconomic. Such an HMA may show the need for sewer links across unexplored land, possibly uncovering archaeological constraints, causing delays of several years.
It seems you have not followed Council's Methodology based on the Development Plans Manual
to require this developer to reappraise existing LDP site allocations without extant planning permission through the candidate site assessment process.
I don't see that the Employment Land Study indicating (3.1) Model Farm to be a "realistic development proposal" over-rides the DPM guidance on examining viability constraints, so is this decision documented, please ?
In view of the response deadline, we look forward to a timely response. We'd ask that you consider the above omissions, deem that a firm Statement of Common Ground with DCWW similar to that of 2015 is required at this stage, and issue amendments to this draft RLDP to cover them.

Attachments:

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

6645 Comment

Document Element: Background Papers, BP44 Infrastructure Plan
Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

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.

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).

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

6653 Object

Document Element: Background Papers, BP44 Infrastructure Plan

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

Summary:

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.

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.
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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
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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).

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

7089 Support

Document Element: Background Papers, BP46 Settlement Boundary Review

Respondent: Mr Phil John [1119]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Support is given to the changes to the settlement boundary for the inclusion of Westwinds business park and the immediate area to the south, some of which comprises brownfield land. Support is also given to the inclusion of Cwrt Canna and Llangan Primary School all within the settlement boundary.

Full text:

In summary the current settlement boundary of Fferm Goch is questioned under Policy SP2 Settlement Strategy. A revision to the minor rural settlement boundary of Fferm Goch is therefore proposed to allow the settlement boundary to follow criterion as set out in BP46; Settlement Boundary Review. The proposed change would allow the plan and meet the tests of soundness.

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our responses and include:

•

Fit: Ensuring the plan is consistent with other plans, national policy, and relevant objectives.

•

Appropriateness: Confirming that the plan is appropriate for the area based on evidence.

•

Deliverability: Ensuring the plan is likely to be effective. The soundness of the LDP is assessed through a selfassessment by the Local Planning Authority (LPA) and then by an independent inspector.

SP2 Settlement Strategy and BP46 Settlement boundary Review Within BP 46 it is stated that the settlement boundaries separate the defined built up areas from the open countryside and are essential for managing development. The LDP aims to focus development within existing urban areas and restrict the scope of development in the countryside. The settlement boundaries are drawn to indicate where development is and is not considered acceptable albeit other material considerations will need to be considered. Planning Policy Wales (Edition 12 February 2024) (PPW) states: 'Planning authorities must prioritise the use of suitable and sustainable underutilised land and/or underutilised sites for all types of development and that when identifying sites in development plans, planning authorities should consider previously developed land and/or underutilised sites located within existing settlements in the first instance with sites on the edge of settlements considered at the next stage (para 3.43). The document goes on to state: 'Settlement boundaries play an important role in ensuring the delivery of sustainable development by encouraging development within the sustainable settlements. They also assist in protecting the surrounding undeveloped countryside from inappropriate development, in line with national planning policy by delineating the extent of built development. With regard to the settlement boundaries BP46 states : 'The delineation of settlement boundaries therefore helps to support and reinforce the delivery of the Plan's objectives and strategy and provides a key policy mechanism for managing growth within the Vale of Glamorgan'. The purpose of settlement boundaries is to protect the countryside beyond and to delineate the extent of built developments. It is understood land located to the outside of the settlement boundaries will then be considered as countryside for planning purposes and treated as such in decision making. PPW confirms the national position on development outside of settlements and states: 'Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area.' (Paragraph 3.60) BP46 Settlement Boundary Review, paragraph 3.5 and 3.6 sets out a methodology as follows: 3.6 Using these methods, the following methodology was followed:

• 1A Review the existing settlement boundaries for any anomalies.

• 1B Review the existing settlement boundaries to ensure that they logically follow building curtilages, where these have a functional relationship with existing dwellings.

• 1C Identify development completed since the 2016 Review adjacent to settlement boundaries.

• 1D Identify extant planning permission for housing or other appropriate built development adjacent to settlement boundaries.

• 1E Examine land uses immediately adjacent to the existing settlement boundaries and consider whether they lend themselves to being included within the settlement.

• 1F Ensure that the settlement boundary is drawn to logical defensible boundaries It is noted that the Fferm Goch settlement boundary has been amended from the position in the adopted LDP. The settlement boundary now includes:

• the parcel of land allocated for the affordable housing led site (HG4(4), Supported.

• the existing employment site of West Winds Business Park, Supported.

• the new housing to the south (Cwrt Canna), Supported.

• Llangan Primary school, Supported. Support is given to the changes to the settlement boundary to accommodate the RLDP allocation for rural led affordable housing (HG4(4), also for the inclusion of Westwinds business park and the

immediate area to the south, some of which comprises brown field land. Support is also given to the inclusion of Cwrt Canna and Llangan Primary school all within the settlement boundary. Objection however is made, with particular reference to stated methodology 1 E and 1F of BP46 Settlement Boundary Review, in regard to the settlement boundary for the west of Fferm Goch where a parcel of circa 0.16 ha has been excluded from what would appear a logical inclusion in the settlement boundary. The reasons for the objection are stated below. The parcel of land that sits to the west of Cherry Acre should also brought in to the settlement boundary (Policy SP2 Settlement Strategy) for the following reasons: The inclusion is Logical in respect of the existing linear settlement pattern to both the north and south of the parcel in question. The exclusion of the parcel appears incongruous when viewed in the context of the rest of the Fferm Goch Settlement (see Plan below of blue line of proposed settlement boundary), particularly in view of the north western edge of the proposed settlement limit.
VOG RLDP proposed settlement boundary at Fferm Goch The 1.6 ha plot is deemed suitable for inclusion as it lies immediately adjacent to developed areas including a domestic dwelling to the east, West Winds Business Park to the north and a stable development to the west. Furthermore an adopted highway sits immediately to the south of the site together with the recently developed Cwrt Canna housing development (this recent development overlooks the parcel of land see photos below) on the other side of the road and Llangan Primary school located immediately south of Cwrt Canna.

Six images.
Given the surrounding development, comprising residential, B1/B2 Employment, on 3 sides of the parcel, it clearly represents an infill site that lends itself to round off the Fferm Goch settlement in a logical manner. The inclusion of the parcel within the settlement boundary would follow the defensible boundaries of the historic field pattern and consistent hedgeline to the west, and the adopted highway to the south and therefore would not propose back land development. The inclusion of the parcel is considered in line with the RLDP strategy and the methodology of BP46 criterion 1F, ensuing that the settlement boundary is drawn to logical defensible boundaries.
As drawn the exclusion of the parcel in question appears arbitrary as it follows the wooden fence to the north, the domestic curtilage of Cherry Acre to the east (a residential house developed in the 1980s), rather than the historic field boundary to the west and adopted highway to the south. The photos attached show the parcel to display characteristics that are not necessarily associated with open countryside and are clearly longstanding in terms of regular maintenance of the improved grassland and semi mature non native tree planting that is regimented rather than sporadic or organic in nature.
It is acknowledged that the parcel sits within the SLA however it is not widely visible given the existing development on 3 sides of the parcel (plus that of the allocation HG4(4) to the north). Designation as SLA does not preclude its inclusion within the settlement boundary and should development be sought in the future then it would need to be clearly proven that any development permitted would have no unacceptable harm on the important landscape characteristics of the area (BP 28 Special Landscape Areas: Upper and Lower Thaw Valley).
It is therefore proposed that the Fferm Goch settlement boundary is revised to include the small parcel to the west (located between the stable and Cherry Acre) that is currently shown outside of the settlement boundary. This proposal is a logical and consistent inclusion, especially when viewed in the context of the linear settlement of Fferm Goch and would allow for a small windfall opportunity in the future of a commensurate scale to the settlement. Small windfall sites are critical in sustaining the vitality of minor rural settlements and supporting community cohesion and infrastructure such as the Community hall, sport pitch, equipped play area and Llangan primary school.
The minor adjustment to the settlement boundary would allow all the methodology of BP46Settlement Boundary Review to be applied and Test 2 of the Test of Soundness to be met in terms of ‘appropriateness’ and confirmation that the plan is appropriate for the area based on evidence.

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3h9

6303 Object

Document Element: Background Papers, BP46 Settlement Boundary Review
Respondent: Dr Suzanne Wyatt [3288]

Summary:

I request that the Vale of Glamorgan Council amend the Llandow settlement boundary to include Ty Fry Farm and The Old Dairy curtilages. They are integral to the village’s built form, visually, functionally, and historically. These properties are within the Conservation Area, connected by continuous development to the village, connected through infrastructure and form part of the village entrance. The current boundary does not reflect their physical and operational relationship with Llandow. The existing Llandow Conservation Area boundary already includes Ty Fry Farm and The Old Dairy and their curtilage. It would therefore be logical and consistent for the settlement boundary to follow the same extent as the Conservation Area in this location. The recognised entrance to Llandow is marked by the village signage located immediately to the east of Ty Fry Farmhouse. The Old Dairy follows on from Ty Fry as the built road frontage into the village. and would form a minor rounding off to the settlement. Including them would create a logical, defensible boundary, better representing the existing development pattern and aligning with conservation and planning policies. Images are attached for reference.

Full text:

Proposed Amendment to the Settlement Boundary - Llandow Site: Ty Fry Farm, Llandow and The Old Dairy, Llandow CF71 7NT

1. Introduction
This representation seeks a minor amendment to the Llandow settlement boundary within the Vale of Glamorgan Replacement Local Development Plan in order to include Ty Fry Farm and The Old Dairy and their associated curtilages.

Llandow is identified within the Replacement LDP as a Minor Rural Settlement under Policy SP2. Settlement boundaries are intended to define the extent of built development and distinguish between the settlement and open countryside.

In the case of Ty Fry Farm and The Old Dairy, the current proposed boundary does not accurately reflect the physical extent and character or functional relationship of the properties with the village. The sites form a clear and established part of the settlement.

It is therefore considered appropriate and logical for the settlement boundary to be amended to include these properties.

2. Relationship to the Existing Settlement

Ty Fry Farm and The Old Dairy form part of the built form of Llandow and are directly related to the village both visually and functionally.

Development continues along the road between the site and the centre of the village, creating a continuous built frontage. There is no meaningful break in development that would suggest a transition into open countryside. It reads as part of the settlement rather than as an isolated
rural development. The settlement boundary does not accurately reflect the existing development on the ground.

Ty Fry Farm has not been an operational agricultural holding for nearly 30 years. Historically the property formed part of a wider farm of approximately 100 acres. The house is one of five listed buildings in the village and has been an important building here since at least the 1800's.
Ty Fry Farm is now a residential property and the house together with about 2 acres lie within the Llandow Conservation Area that extends to include most of the village (see figure 2). The buildings therefore function as part of the established village frontage rather than as an active agricultural enterprise.

3. Absence of Countryside Character
A key purpose of settlement boundaries is to prevent unjustified encroachment into open countryside.

The inclusion of Ty Fry Farm and The Old Dairy within the settlement boundary would not represent expansion into undeveloped countryside. The properties are already established and integrated within the village environment. There is no intervening open countryside separating the site from the rest of the village and therefore their inclusion would regularise the settlement boundary so that it better reflects the existing situation.

4. Infrastructure and Service Provision
The properties are fully connected to the infrastructure serving the village, including:

• Mains drainage

• Electricity supply

• Mains water supply

• Fast fibre broadband

• Direct access to the village road network

These connections demonstrate that the site functions as part of the village and are not dependent on isolated rural infrastructure.

In planning terms, the properties are part of a sustainable location within the existing settlement.

5. Logical and Defensible Boundary
Good planning practice requires settlement boundaries to follow clear and defensible physical features.

The current boundary does not appear to follow a clear physical feature in this location and instead cuts across land that is clearly associated with the settlement.

A revised boundary that follows the curtilage of Ty Fry Farm and the established roadside frontage would provide a more logical and defensible edge to the village. This would also ensure that the settlement boundary more accurately reflects the built form of the village.

6. Relationship to the Llandow Conservation Area
The existing Llandow Conservation Area boundary already includes Ty Fry Farm and The Old Dairy and their curtilage. It

would therefore be logical and consistent for the settlement boundary to follow the same extent as the Conservation Area in this location.

This would align two key planning designations and avoid the current situation where properties recognised as part of the historic settlement are excluded from the defined village boundary.

7. Perception of the Village Entrance
The recognised entrance to Llandow is marked by the village signage located immediately to the east of Ty Fry Farmhouse. The Old Dairy follows on from Ty Fry as the built road frontage into the village. Figures 4 and 5.

For both residents and visitors, this signage clearly indicates the start of the village.

This reinforces the conclusion that these properties form part of the settlement rather than the surrounding countryside.

8. Minor Rounding-Off of the Settlement
The proposed amendment represents minor rounding-off of the existing settlement boundary rather than outward expansion of the village.

Including Ty Fry Farm and The Old Dairy within the settlement boundary would create a more coherent and logical settlement edge whilst maintaining the structure of the village and protecting the surrounding countryside.

The current boundary appears to create an anomaly by excluding properties that clearly form part of the established village frontage. Amending the boundary would correct this anomaly and ensure that the settlement boundary more accurately reflects the built form of Llandow.

The proposed amendment therefore represents a minor refinement to the settlement boundary to ensure that it reflects the established character of the village rather than extending development into the countryside.

9. Statement of Settlement Boundary Logic
The purpose of the settlement boundaries within the LDP is to clearly distinguish between the built form of settlements and the surrounding countryside.

For boundaries to function effectively they should:

• Reflect the built form of the settlement

• Follow recognisable physical features where possible

• Provide a logical and defensible edge to development

• Avoid excluding land that is clearly integrated with the settlement

In the case of Ty Fry Farm and The Old Dairy the current boundary does not achieve these objectives.

The properties form part of the existing built frontage leading into the village and are visually and functionally connected to the settlement. There is no meaningful physical or visual transition into open countryside between these properties and the rest of the village. Furthermore, the current boundary does not follow a clear physical feature and instead cuts across land that is clearly associated with the village.

Amending the boundary would therefore provide a more logical and defensible settlement edge and ensure the boundary more accurately reflects the extent of development at Llandow.

10. Consistency with National Planning Policy
Planning Policy Wales places strong emphasis on sustainable development, efficient use of land and ensuring that development takes place in appropriate locations within existing settlements.

The proposed amendment to the Llandow settlement boundary is consistent with these objectives, The site is integrated with the settlement and benefits from established infrastructure including mains drainage, electricity, water supply and fast fibre internet.

In addition, the proposal aligns with the objects of the Well-Being of Future Generations (Wales) Act 2015, which promotes sustainable communities and the efficient use of existing resources and infrastructure.

11. Conclusion
Ty Fry Farm and The Old Dairy are clearly integrated with the existing settlement of Llandow in physical, visual and functional terms.

The current settlement boundary does not accurately reflect the built extent of the village. Amending the boundary to

include these properties would:
• Better reflect the existing pattern of development

• Create a logical and defensible settlement edge

• Align the settlement boundary with the Conservation Area

• Recognise the established relationship of the properties with the village

For these reasons it is respectfully requested that the Vale of Glamorgan Council amend the Llandow settlement boundary to include Ty Fry Farm and The Old Dairy to the extent that the properties and their curtilage are shown on the Llandow Village Conservation Area map.

Images are attached for reference:
Figure 1 - Current Llandow settlement boundary
Figure 2 - Llandow Conservation Area
Figure 3 - Proposed amended settlement boundary. This aligns the Conservation Area Map at the east of Llandow to include Ty Fry Farm and the Old Dairy in the Llandow settlement boundary proposal
Figure 4 - Llandow village entrance signs. Ty Fry Farmhouse is visible as you pass the Village sign on the road into Llandow
Figure 5 - The Old Dairy forms part of the built frontage going into Llandow
Figure 6 - Land in ownership of Ty Fry Farm. The Old Dairy is also shown on this plan immediately to the west of Ty Fry Farm. The area outlined in green is outside of the Conservation area and outside of the proposed settlement boundary for Llandow

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/tg4