

11th March 2026

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address. Vale of Glamorgan Council
Civic Office
Barry
CF63 4RT

Dear Sir / Madam

Vale of Glamorgan Candidate Site Submission

Representations regarding the Candidate Site Submission – Land off Millennium Way

Please find enclosed, on behalf of and under instruction from our client, 'Cadoc Castle Land Developments LTD.' representations for consideration as part of Vale of Glamorgan's Candidate Site Submission.

The site is currently allocated for employment use (B1, B2 and B8) in the adopted LDP under Policy MG9 (5) 'Land at Ffordd Mileniwm'.

This submission comprises a new proposal for the proposed allocation of the above site in the RLDP. Previously the site was submitted for residential (ID: 4070) and mixed-use (ID: 2804) development through the RLDP candidate site process, however, was not progressed as a result of a legal covenant restricting the uses that can be delivered on the site.

The new proposal seeks to secure an allocation of the site for industrial use (B1, B2 and B8), with Barry Training Services registering their interest and commitment to delivering their new facilities at the site. Additionally, Vertex Systems have also expressed interest in expanding its manufacturing operations from an existing site in Monmouth.

Insofar as to the legal covenant that exists over the site, the terms and requirements of the covenant does allow for B1, B2 and B8 uses to be permitted, and therefore, the proposed use of the site is not constrained in this respect. This is of course evident in the site's current allocation for these uses in the adopted LDP.

The Prospectus that was previously submitted to support the allocation of the site (for residential and mixed-use) is appended to this submission (**Appendix A**), and should be read in conjunction with this statement. It should also be noted that the following information is submitted alongside this letter:

- Integrated Sustainability Appraisal (ISA) Site assessment proforma;
- Development Viability Model (dated March 2026) completed by Cooke & Arkwright;
- Appendix A – GJP Prospectus (Feb 2024);
- Appendix B – Barry Training Services Letter to GJP;
- Appendix C – Vertex Systems Email to GJP; and
- Development Viability Supporting Email.

Whilst a number of the previous assessments and reports were undertaken and produced to support the residential promotion of the site, they are equally applicable to this submission, and therefore, are submitted with this candidate site submission accordingly. These are as follows:

- Drainage Technical Note (August 2024) – prepared by Stuart Michael Associates;
- Preliminary Ecological Appraisal Report (June 2024) – prepared by I&G Ecology;
- Land off Ffordd Y Mileniwm – GI Statement (December 2024) – prepared by Soltys Brewster;
- Green Infrastructure Context Plan (December 2024) – prepared by Soltys Brewster;
- Preliminary Site Investigation (February 2022) – prepared by Terra Firma;
- Supporting Letter (June 2024) – prepared by Integral Geotechnique;
- Baseline Noise Assessment (August 2024) – prepared by Sustainable Acoustics; and
- Transport Assessment (December 2024) – prepared by Stuart Michael Associates.

This document will review the following as part of the site's acceptability to be considered as an allocation:

- **Description** of Site / Surrounds and Planning History;
- Summary of the **Proposals** for the Site;
- Completion of a **Sustainability Appraisal** (required for all submissions);
- Justification of Site against **Candidate Site Assessment Methodology**; and
- **Overall justification** of Acceptability of Site as an Allocation.

Background

The site measures approximately 8.46 hectares (ha), and is located directly adjacent to the settlement of Barry (which lies within the administrative boundary of the Vale of Glamorgan County Council). The site comprises of an irregular parcel of previously developed land, bound by a fence line to the west, a mature treeline to the north, and commercial land to the south and east. An aerial view of the site can be seen below:



Aerial view of the site (with approximate site location in red)

The site is currently allocated in the adopted LDP for employment purposes (B1, B2, B8) under Policy MG9 (5) 'Land at Ffordd Mileniwm'.



Extract of LDP Proposals Map and Site Allocation

The Council are currently proposing to de-allocate the site in the emerging RLDP. The Employment Land Study (2023) undertook a review of all existing employment allocations, and outlined the following in respect of the site:

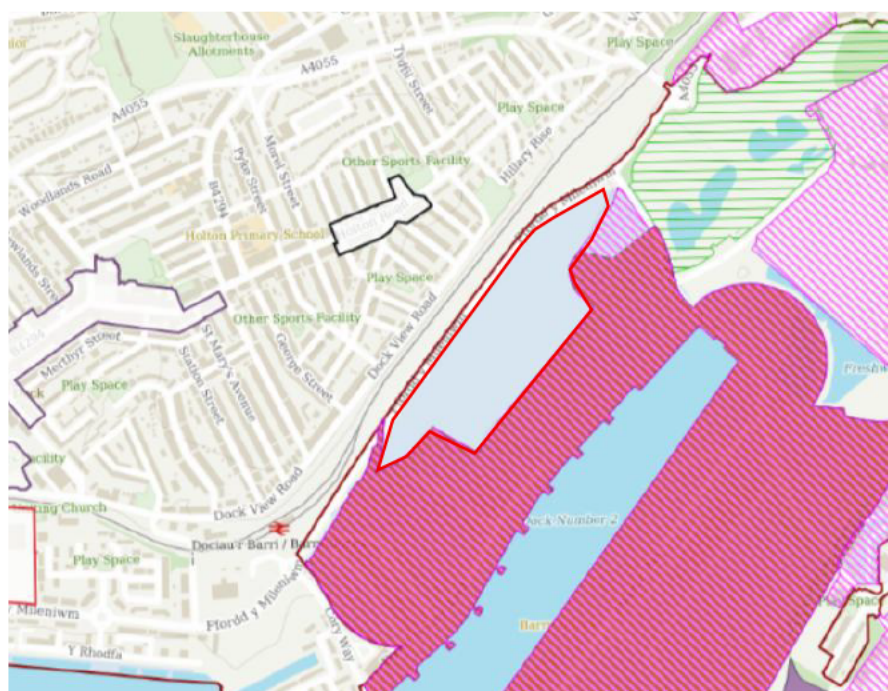
"The site has been on the market for a decade and has only attracted interest for retail and leisure. This may partially reflect the site's peripheral position in the core Barry Docks/Atlantic Trading Estate market area, but also likely the lack of site servicing and access, the costs of which will impact on viability. If judged appropriate on other matters, the commercial use proposed here would at least provide a new access point from which the rest of the site could be opened up for B-Class uses. Even with this new access in place however, it is unclear if the landowner has the resources and interest to market the remaining land for B-Class uses and to translate any market interest generated into concrete development proposals, securing development partners, etc. Thus, the deliverability of this site remains questionable even with the initial access provided. Delivering B-Class uses here may thus require a degree of external support and the land should not be allocated again in the Replacement LDP for B1, B2, B8 uses unless a clear 'way forward' can be agreed to open up the remaining land for relevant development."

In light of the above assessment, the Employment Supplementary Paper (2025) outlined the following recommendation in respect of the site:

"The site has not been allocated but has been retained as white land within the settlement, offering an opportunity for it to be redevelopment for employment should this be deliverable in the future."

Accordingly, the evidence base undertaken to inform the preparation of the Plan recognises the development potential of the site, and outlines that by retaining the site as white land within the settlement, this allows for an opportunity for the site to be developed for employment purposes in the Plan period.

That said, the Deposit Plan Proposals Map shows the site to be located outside of the settlement boundary, as shown in the extract below:



VofG Deposit Plan Proposals Map – Site Outlined in Red

Accordingly, this submission not only makes the case for the proposed re-allocation of the site for employment use, but also that the settlement boundary should be amended to include the site, in line with the recommendations of the Employment Land Paper. As set out in the Development Plans Manual (2020), the policies and allocations in the LDP should flow from the evidence, rather than it being collected retrospectively. As such, further comments regarding the settlement boundary are provided in this submission below.

Site Surroundings and Sustainability

The subject site is located just off Millennium Way, only a 7-minute drive from the A4231 Barry Docks Link Road which links to Cardiff and the M4 to the north. The site is also located immediately adjacent to a number of existing industrial uses, which primarily form part of and relate to the ABP operations in Barry.

In short, the site is bordered by the following land uses:

- To the north by residential dwellings;
- To the east by commercial units / employment land, and Barry Docks Entrance Channel;
- To the south by commercial units;
- To the west by residential dwellings.

Barry offers a wide range of community and civic facilities, to cater for the needs of its residents. These include health services, education, recreational facilities, community centres, cultural amenities, transport links and retail services. These are as follows:

Community and Civic Facilities

The following are within 1.5 miles of the site:

- Waterfont Medical Centre;
- West Quay Medical Centre;
- Ravenscourt Surgery;
- Court Road Surgery;
- Barry library;
- Barry leisure centre; and
- Snap Fitness gym.

Retail and Leisure

There are a variety of local amenities within the surrounding area. Holton Road is the traditional shopping area in Barry and is located within a mile of the subject site. In addition, there are other local amenities within 1.5 miles of the subject site and these are as follows:

- Morrisons;
- ASDA Superstore;
- Waterfront Retail Park (Poundstretcher, Pets at Home, Argos, Halfords); and
- Goodsheds food and retail outlet.

Public Transport

In terms of public transport, the nearest train station is Barry Docks Train Station which is located approximately 550m from the site. The station provides a train service every 15 minute, which provides services into Cardiff, and the opposite direction towards Bridgend. The nearest bus stops to the site are located along Millennium Way, approximately 400m from the site. Bus number B3 services the stop and provides hourly services around Barry Town Centre.

Accordingly, the site is located in an inherently sustainable location with excellent access to existing public transport provision – to the benefit of the proposed uses of the site (which are discussed in detail below).



Development Proposals

As outlined in this submission, the site comprises approximately 8.46 hectares of total gross site area. The site represents an irregular shaped parcel of previously developed land, which is located adjacent to the settlement boundary of Barry.

Moreover, the site is currently allocated in the adopted LDP for employment purposes, with B1, B2 and B8 uses considered acceptable for this location.

Accordingly, this submission seeks to retain the site's employment / industrial allocation in the RLDP.

Industrial Use

This submission seeks to secure an employment allocation for an industrial use, which will primarily be located within the central and western areas of the site, closely located and related to the existing industrial uses to the west and south of the site.

Specifically, a scheme has been developed for this area of the site, whereby Barry Training Services Ltd (BTS) are proposed to provide new onsite training facilities, which will take the form of the following:

- 40,000sqft warehouse training building;
- 40,000sqft classroom training and welfare building;
- External area for construction machinery training;
- External area for storage space for BTS partners; and
- Car park.

A letter from BTS accompanies this submission (**Appendix B**) which sets out their interest and commitment to delivering the development at the site. The site offers an opportunity to meet their ever-increasing needs, and to address their ongoing challenges that they face at their current facility in Barry.

BTS is a partner company of the site promoter, Cadoc Castle Developments, and therefore, the site represents a logical location for their proposed expansion, given that there is a common shareholding between the two companies.

To the eastern area of the site, smaller industrial units are proposed, which would benefit from the wider industrial development of the site undertaken by BTS. This would form part of a longer strategy to develop this area of the site, which would benefit from the new access road provided into the site from Fford Y Mileniwm.

Vertex Systems have expressed their interest in the site, as they are looking to expand their existing manufacturing operations from an existing site in Monmouth. An email from Vertex registering their interest accompanies the submission (**Appendix C**) and should be read in conjunction with this statement accordingly. In short, they confirm that they are looking to acquire a unit between 25-40,000sqft in the Cardiff and Vale of Glamorgan area, and consider that the site represents an excellent proposition given the available labour pool in Barry. This provides further support of the deliverability and viability of the site for an employment use.

The residual area of the site (north-east corner) is designated as potential space for either expansion of businesses on site, or for future development. It is considered that establishing the proposed industrial uses on site will result in this area being an attractive proposition to potential developers, not least that the infrastructure within the site will be implemented, including the access into the site. Accordingly, this part of the site represents a more longer term opportunity.

High Level Plan

A high-level plan has been prepared to support the suggested uses as part of an allocation for employment uses. This helps to illustrate the possible configuration of the uses and facilities proposed within the site.



High Level Plan

A more detailed plan will follow at a later stage, but for the purposes of this submission, the above plan sufficiently identifies how the development of the site can be achieved for industrial uses. Moreover, the plan illustrates the vision of the site to create a new economic hub in this area of Barry, that will result in the creation of significant employment opportunities in a number of different fields and sectors and complement the surroundings uses whilst bringing forward a sustainability located site..

As shown in the plan above, the majority of the site would be occupied by Barry Training Services, in order to meet their ever-increasing needs. The facilities and external space all form part of their industrial training services that they provide, and would be suitably located in this area of Barry – close to the railway station to the west of the site.

Overall, in its purest form, the proposed development of the site seeks to deliver:

- Development of industrial uses which will be primarily utilised by BTS to meet their ever-increasing needs;
- Smaller industrial development which would be occupied by Vertex Systems;
- Terraced industrial units along the frontage of the site;
- Potential area for expansion or new development of industrial uses;
- 1no. single access into the site and associated upgrades to the surrounding highway network where necessary;
- Strong legible pedestrian connections throughout the site and with the existing settlement;
- Public open space;
- Green Infrastructure; and
- Sustainable Drainage Systems (SuDS).

Integrated Sustainability Appraisal

To support the submission of the site, an Integrated Sustainability Appraisal (ISA) Site assessment proforma has been completed, and should be read in conjunction with this statement. The completed proforma is submitted with this submission

An extract of the completed proforma for the site and proposals is provided below:

Site ID	Allocation type	Site name	Max no. homes	Economy	Homes	Schools	Health	Leisure	Equality	Transport	Water	SPZ	NVZ	ALC	Minerals	Biodiversity	Historic Env	Landscape	Flood risk	Net Zero
N/A	Employment, Retail	Land off Millenium Way	N/A	++	0	-	++	+	+	++	-	+	+	++	+	+	-	++	-	N/A

It is evident that the site scores well against all but few criteria, and these are discussed below:

Schools

It is not considered that this is relevant in the context of the proposals, given that no residential proposed. Accordingly, this is not considered to be a 'failing' or constraint of the site and the proposals.

Water

The site is located within 1km to a waterbody, however, this does not pose a constraint to the development of the site.

Historic Environment

The site is situated within 200m of a number of local heritage assets, however, none of these assets would be detrimentally affected or pose a constraint to the proposed development of the site.

Flood Risk

Very small areas of the site are located within Flood Zone 2 for surface water, however, this can be easily mitigated through the adoption of SuDS within the site. accordingly, the site is not considered to be constrained in this respect.

Previous ISA

A proforma was completed by the Council for each of the options that were previously promoted for the site. Accordingly, for context extracts of each of the ISA's completed for the options is provided below:

Site ID	Allocation type	Site name	Max no. homes	Economy	Homes	Schools	Health	Leisure	Equality	Transport	Water	SPZ	NVZ	ALC	Minerals	Biodiversity	Historic Env	Landscape	Flood risk	Net Zero
2804	Mixed Uses	Land Off Millenium Way, Barry (Option A - Housing and Commercial)/Tir oddi ar Ffordd v	250	++	++	-	++	+	+	++	-	+	+	?	+	?	-	?	-	?
4070	Housing	Land Off Millenium Way, Barry (Option B - Housing)/Tir oddi ar Ffordd y Mileniwm, Y Barri (Opsw'n B - Tai)	339	+	++	-	++	+	+	++	-	+	+	?	+	?	-	?	-	?

As has been demonstrated earlier within this report, there are no issues present within the site that would be insurmountable to delivery of the site for an employment use. Detailed and technical evidence and assessment work would be submitted with any planning application to support this conclusion.

In summary, and on balance, the site clearly scores well against the pertinent site assessment criteria, and therefore complies with multiple sustainability Objectives.



Justification of Site against Candidate Site Assessment Methodology

This document uses the 'traffic light' scoring system to determine the suitability of sites against the assessment criteria with each section, thereby enabling the Council to filter sites out depending on a site's performance against the criteria outcomes and considered against the following outcome.

Table 1 – Site Assessment Criteria Outcomes	
GREEN	Positive- No constraint to development
AMBER	Amber – Constraints identified requiring mitigation/policy intervention- Further consideration required
RED	Negative- Major constraint to development or contrary to national policy or not enough information provided

Before delving into the assessment of the latest proposals for the site, extracts of the previous assessments undertaken by the Council in respect of both sites are provided below for context.

ID	2804	4070
Settlement	Barry	Barry
Site Name	Land Off Millennium Way, Barry	Land Off Millennium Way, Barry
Proposed Use	Mixed Use	Housing
Developer interest		
Brownfield/Greenfield Land		
Locally Protected Sites (SINCS and Local Nature Reserves)		
Wildlife Corridors, Green Networks or Stepping Stones		
Protected or Priority Species		
Historic environment		
Agricultural Land Quality		
Minerals Resources		
Green Wedge Designations		
Special Landscape Area and Glamorgan Heritage Coast Designations		
Contaminated Land		
Existing Physical Site Constraints		
Topography and Site Conditions		
Tree Preservation Orders, Hedgerows and Woodlands		
Amenity and Compatibility with adjacent uses		

Environmental & Physical Constraints Conclusions		
Location - Employment and Retail Proposals		
Access to Services and Facilities		
Access to Retail		
Access to Primary Schools		
Access to Health Services		
Access to other Community Facilities		
Access to Green open Spaces/GI		
Sustainable Transport - Public Transport		
Sustainable Transport - Active Travel		
Access/proximity to services and facilities conclusions		
Community Facilities		
Connectivity and Capacity		
Infrastructure availability conclusions		
Other Infrastructure		
Highway Accessibility		
Climate Change		
Placemaking - Character and Place		
Health & Wellbeing		
Suitable for further Consideration		

As can be seen in the scorings of the proposed uses above, predominantly the site was scored to be 'positive', in that there is no constraint to development in respect of that specific consideration. Evidently, it has been recognised by the Council that the site is considered to not have any constraints to development in a significant number of different considerations.

The only matter scored as 'red' relates to 'Protected or Priority Species', however, this is strongly disputed given that a Preliminary Ecological Appraisal was previously undertaken of the site in 2024, which determine the site to have **low local** ecological value. Whilst further surveys would be needed as part of any planning application, there are no fundamental ecological concerns associated with the site, and therefore, does not prohibit the deliverability and soundness of the site in this respect.

The Preliminary Ecological Appraisal (completed by I&G Ecology) forms part of this submission, and therefore, should be read in conjunction with this statement.

In terms of the overall 'suitability' of the site, where it was also scored 'red' in the assessment of the site, this relates solely and only to the covenant that exists on the site – in terms of controlling the uses allowed under the covenant in agreement with ABP. As set out in this submission, it is considered that this issue falls away as result of the industrial uses proposed, which is in accordance with the terms / requirements of the covenant.

For the purposes of this submission and the new proposed uses for the site, a separate site assessment has been undertaken in accordance with the Candidate Site Assessment Methodology that underpins the assessment of candidate sites in the RLDP.

Site Availability (8.1)

Ownership and Legal Considerations (8.1.1)

Public Land	Red	The site is not included in a published disposal strategy
Land Ownership	Green	The site is owned by a single landowner who supports the site proposal or, if in multiple ownership there is evidence of an agreement to the site proposal.
Developer Interest	Green	There is evidence of developer interest in the site proposal, or the site has extant planning permission.
Legal covenants	Amber	There are legal rights or restrictive covenants in place on part or all of the land and evidence submitted that this is unlikely to affect its allocation in part or as whole.

As discussed at the outset of this submission, there is an existing covenant on the site that restricts the use of the site to B1, B2 and B8 uses – which the Council are fully aware as a result of previous discussions on the development of the site. That said, the proposed uses of the site are fully compatible with the terms of the covenant, and therefore, the development is not constrained in this respect.

Site Availability (8.1.2)

Site Availability	Green	Available for development in short term (within 5 years)
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The site promoter will work in conjunction with the developers to bring the site forward in the short term, with separate planning applications submitted for the various land uses within the site. It is not considered that there are any insurmountable constraints associated with the site that would impact delivery, and therefore, the site is available in the short term.

Site Availability Assessment Outcome	
The site is affected by some ownership constraints that can be addressed	

Site Viability (8.2)

Initial viability appraisal (Stage 1 criteria) (8.2.1)

Viability	Green	An initial site viability appraisal has been undertaken and is within the viability parameters set out by the Council. Further detailed assessment is required as part of the candidate site assessment process.
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The site is submitted with a DVM completed by Cooke & Arkwright. This confirms that the proposed development is viable in light of the uses proposed, and the relevant infrastructure to deliver the development.

Deliverability and Viability Assessment Outcome	
Initial viability appraisal undertaken which illustrates adequately that the site viable and deliverable	



Flood Risk Zones (*stage 1 criteria*) (8.3.1.)

As highlighted above, the site is not at risk of flooding in any respect.

Very small areas of the site are located within Flood Zone 2 for surface water, however, this can be easily mitigated through the adoption of SuDS within the site. accordingly, the site is not considered to be constrained in this respect. The RLDP Constrains Map overleaf illustrates the very small areas of surface water risk within the site.



As detailed above, the site is largely brownfield, and already benefits from employment use in the adopted LDP.

Ecological Designations and Protected Species European Sites: SAC/SPA/RAMSAR	Green	No adverse impact on the SAC /SPA/Ramsar designation
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The site is not affected by any European sites or designations.

SSSI Designations and Ancient Woodlands (stage 1 criteria) (8.3.4.2)

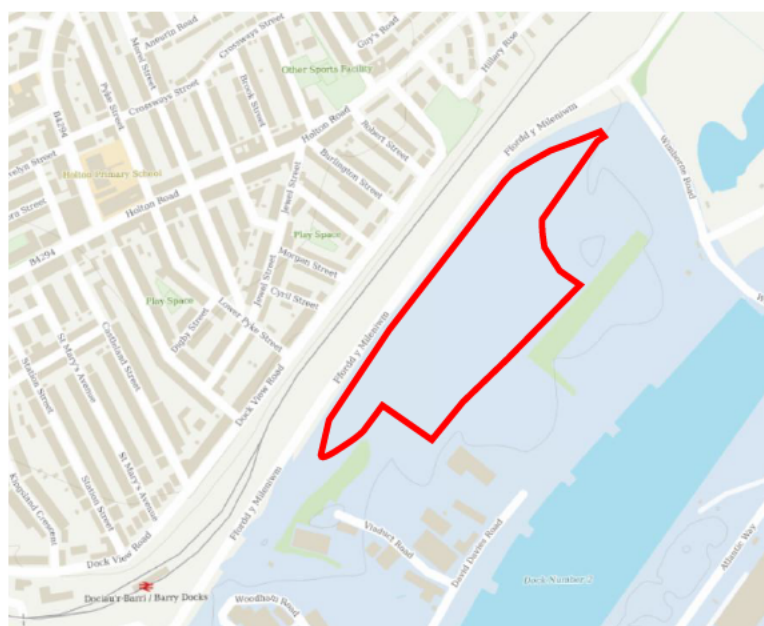
Ecological Designations and Protected Species SSSI and Ancient Woodlands	Green	No adverse impact on the SSSI/Ancient Woodland designation.
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The site is not within 100m of a SSSI/Ancient Woodland.

Locally Protected Sites (SINCS and Local Nature Reserves) (stage 2 criteria) (8.3.4.3)

Ecological Designations and Protected Species Locally Protected Sites- SINCS, Local Nature Reserves	Green	No adverse impact on locally designated sites.
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The site is not impacted by any locally designated sites. This is confirmed in the RLDP Constraints Map below.



RLDP Constraints Map (Approx site location in red)

Historic Environment (stage 1 criteria) (8.3.5)

Historic Environment	Amber	The site has, or is in close proximity to, a historic asset, the setting of a historic asset and/or archaeologically sensitive area, and appropriate mitigation can likely be achieved.
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A Heneb Historic Environment Record (HER) is located within the site – specifically a site of a post-medieval cottage. However, it is not considered that the development would have any unacceptable impact on this asset, given that it does not remain as a physical structure, but rather a record of a cottage that was previously located in this location.

Agricultural Land Quality (stage 2 criteria) (8.3.6)

Agricultural Land Quality (stage 2 criteria)	Green	The site is previously developed land or would not result in the loss of Best and Most Versatile Agricultural Land
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The site is classified as 'U' on the Predictive Agricultural Land Classification Map 2. Accordingly, the site will not result in the loss of any valuable agricultural land.

Minerals Resources (stage 2 criteria) (8.3.7)

Minerals Buffer Zones and Minerals Safeguarding Areas	Green	The site is not within a mineral safeguarding area, or the proposal would not unnecessarily sterilize a safeguarded mineral resource. The site is not within a minerals buffer zone or is not classified as a sensitive use within a buffer zone.
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The site is not within a mineral safeguarding area.

Green Wedge Designations (stage 2 criteria) (8.3.8)

Green Wedge	Green	The proposal is not within a Green Wedge
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The site is not located within a Green Wedge.

Special Landscape Area and Glamorgan Heritage Coast Designations (stage 2 criteria) (8.3.9)

Special Landscape Areas and The Glamorgan Heritage Coast	Green	The site is not located within a Special Landscape Area/ The Glamorgan Heritage Coast
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The site is not located within a Special Landscape Area or within the Glamorgan Heritage Coast.

Tree Preservation Orders, Hedgerows and Woodlands (stage 2 criteria) (8.3.10)

Tree Preservation Orders Hedgerows and Woodlands.	Green	No TPOs present on site, and the proposals would not lead to significant tree loss
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There are no TPOs located within the site, and the development would not result in significant tree loss.

Contaminated Land (stage 1 criteria) (8.3.11)

Contamination	Amber	Part or all the site is contaminated but evidence has provided to indicate that remediation would be possible and viable
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Terra Firm undertook a Preliminary Investigation of the site in 2022, which confirmed that soil contamination test results have been screened against commercial end use criteria and found to be acceptable. This report is submitted with this submission.

The ground contamination found to be present on site by Terra Firma, are considered typical of brownfield sites of this nature. Many land parcels in and around Barry Docks with similar ground conditions have been successfully redeveloped for residential end use.



Accordingly, for the proposed commercial uses of the site, it is not considered that there is any insurmountable contamination constraints present at the site that would prohibit the site's delivery.

Amenity and compatibility with adjacent uses (stage 2 criteria) (8.3.12)

Amenity Impact-adjacent uses	Amber	Potential sources of noise, dour, light and/or dust pollution impacts identified can be mitigated / the proposal would be compatible with adjoining uses using mitigation measures
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A Baseline Noise Assessment (2024) was previously undertaken by Sustainable Acoustics to support the proposed residential promotion of the site. The findings of this assessment equally apply to this latest proposal, where whilst there is noise arising from Fford Y Mileniwm, it does not represent a fundamental concern in respect to the proposed uses of the site. If necessary, suitable mitigation can be implemented along the site boundary, however, this is unlikely given the uses proposed for the site – i.e. industrial.

Existing Physical Site Constraints (stage 1 criteria) (8.3.13)

Existing Physical Site Constraints	Green	The site is free from constraints.
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There are no known constraints on site that would prohibit any development.

Topography and Site Conditions (stage 1 criteria) (8.3.14)

Topography and Site Conditions	Green	The site is free from constraints
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There are no existing topography or site conditions constraints at the site that would affect the site's development in the Plan period.

Environmental and Physical Constraints Site Assessment Outcome	
No physical or other constraints	

Site Location: Accessibility and Proximity to Services and Facilities (8.4)

Location – Residential Proposals (stage 1 criteria) (8.4.1)

Settlement Hierarchy	Green	The site is within or adjoins the existing settlement boundary of either the Key Settlement of Barry, Service Centres, Primary Settlements or Minor Rural Villages.
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The site adjoins the settlement boundary of Barry, and therefore, is in a sustainable location.

Location – Employment and Retail Proposals (stage 2 criteria) (8.4.2)

Location-Employment and Retail Uses	Green	The site is within, or adjoins an existing employment sites or town, local or neighbourhood retail centre.
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The site is currently allocated for employment use (B1, B2 and B8) in the adopted LDP under Policy MG9 (5) 'Land at Ffordd Mileniwm'. Moreover, the site is located immediately adjacent to the proposed Major Employment Site 'Operational Port, Barry Docks, Barry' allocated in the Deposit Plan under policy EMP3 (1).

Access to Services and Facilities (stage 2 criteria) (8.4.3)

Access to Services and Facilities	Green	Within 800 m of site (10-minute walk)
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The site is within 800m of Barry town centre, as well as Barry Docks train station. Accordingly, the site is within walking distance to key services and facilities in Barry.

Access to Green Open Spaces / Green Infrastructure (stage 2 criteria) (8.4.4)

Access to Green Open Spaces/Green Infrastructure Network	Amber	The site is between 10-to-20-minute walking distance of useable green space, public open space, or open access land
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The site is within 10 to 20 minute walking distance to Victoria Park to the north of the site. That said, the development would incorporate areas of useable green space on site, and therefore, would score higher once the development has come forward.

Sustainable Transport – Public Transport (stage 2 criteria) (8.4.5)

Sustainable Transport Public Transport	Green	The site is served by public transport connections within 800m walking distance of the site and provides an acceptable minimum frequency of 1 service per hour Mondays to Saturdays plus Sunday service)
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The site is situated within close walking distance to Barry Docks Train Station, which provides three services an hour to Cardiff and the wider Vale. The site is also serviced by the B3 bus service located along Millennium Way which provides hourly services around Barry Town Centre.

Accordingly, the site is in a very sustainable location which excellent access to sustainable transport provision.

Sustainable Transport- Active Travel (stage 2 criteria) (8.4.6)

Active Travel Walking and Cycling	Amber	The site is connected to an existing or proposed active travel route or is within 800m of an existing/proposed active travel route.
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A future proposed active travel route (both walking and cycling) is proposed along Fford Y Mleniwm (ref. VALE-SPR-Future-001G) which is expected to be delivered in the short term. As such, it is considered that the site is well connected to this proposed route, and will benefit from its implementation accordingly.

Moreover, Fford Y Mileniwm already forms part of the Wales Coastal Path network, and therefore, presently serves a walking and cycling connection to the centre of Barry.

Community Facilities (stage 2 criteria) (8.4.7)

Community Facilities	Green	The site will not result in the loss of an existing community facility.
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The development of the site will not result in the loss of an existing community facility.

Location and Accessibility Assessment Outcome		
Site is in a settlement that offers good accessibility to services and facilities location and accessible by a range of modes		

Infrastructure Availability (8.5)

Connectivity and Capacity (stage 2 criteria) (8.5.1)

Service connection Water and Sewerage	Amber	Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales
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It is considered that further investigation would be required to determine local capacity, however, it is not considered to pose a constraint to development, given that the site already benefits from an existing employment allocation in the LDP.

Other Infrastructure (stage 2 criteria) (8.5.2)

Other Infrastructure connections Electricity, Gas, Broadband and telephone	Amber	Existing or proposed services would be suitable subject to local improvements
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It is considered that further investigation would be required to determine local capacity, however, it is not considered to pose a constraint to development, given that the site already benefits from an existing employment allocation in the LDP.

Highway Accessibility (stage 2 criteria) (8.5.3)

Highway access Local and Strategic Network	Green	No constraints on highway accessibility, site can provide safe access with minor mitigation measures
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A Transport Assessment (TA) was prepared by Stuart Michael Associates in 2024 to support the previously proposed residential and mixed use development of the site. The TA confirmed that, whilst the proposed development proposed two options, full residential or mixed use, the scale of development and trip generation (hourly and daily) can be accommodated by a single point of access.

The TA concluded that the proposed development would have a negligible impact upon the operation and safety of the surrounding road network. Given that vehicle movements would be similar to what was previously proposed, it is considered that the findings remain valid, and therefore, there are no constraints on highway accessibility to the site.

Infrastructure Availability Assessment Outcome		
Limited capacities identified that may be addressed through mitigation - internal/external consultation to be undertaken to verify measures required		



Climate Change, Placemaking and Wellbeing (8.6)

Climate Change (stage 2 criteria) (8.6.1)

Climate Change	Amber	The development shall incorporate carbon reduction measures and/or energy sources above that required by Building Regulations
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The proposed development has potential to incorporate carbon reduction measures in accordance with Building Regulations. This would be reviewed as part of any detailed design for the development of the scheme, however, given the nature of the proposed uses, it is not considered this is unachievable in any respect.

Placemaking- Character and Place (stage 2 criteria) (8.6.2)

Placemaking- Character and place	Green	Development of the site has the potential to enhance the character of the area and contribute positively to national sustainability and placemaking principles
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The proposed Candidate Site would meet the national sustainable placemaking outcomes set out in Planning Policy Wales 12 (Figure 5 refers) in the following ways:

- I. **Creating and sustaining communities** – the site would provide significant employment opportunities on site for a whole host of different sections – such as industrial, retail, hospitality etc.;
- II. **Growing our economy in a sustainable manner** – the provision of new employment space will enhance economic activity in this area of Barry – tied in with the wider port employment area;
- III. **Making best use of resources** – the construction of the site would look to make the best use of sustainably sourced materials and would comprise high quality buildings which would be built to last;
- IV. **Maximising environmental protection and limiting environmental impact** – ecology is a key consideration in preparing the layout for the site and retention of key hedgerow / trees has been an important consideration. Moreover, the site is sustainably located and would therefore limit car usage through walkable amenities and supporting the use of other methods of sustainable transport. Other elements to the scheme such as electric vehicle charging points would also be explored to help to reduce pollution.
- V. **Facilitating accessible and health environments** – the site is well located in walking distance to a range of facilities and public transport to promote sustainable development. Moreover, areas of green space have been provided within the site to support appropriate play space and amenity areas for residents.

The development of the site would represent a significant improvement compared to the current character to the site, which is not considered to provide any positive setting to the wider environment. Accordingly, the development of the site represents an excellent opportunity make best use of land for employment purposes, which will bring about significant job opportunities in a sustainable location.

Accordingly, the development of the site will result in the creation of a new place, which will consider the context, function and relationship between the site and its wider surroundings. In short, the site will become a hub of employment activity, much to the benefit of Barry and its role within the Vale of Glamorgan.

Health and Wellbeing (stage 2 criteria) (8.6.3)

Health and Wellbeing	Amber	N/A
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Climate Change, Placemaking and Wellbeing Assessment Outcome		
The proposal is considered complimentary to climate change national; national placemaking outcomes and make a positive contribution to health and well-being objectives.		



Overall Justification of Acceptability of Site as an Allocation

As set out within this submission, the Council are currently proposing to de-allocate the site in the emerging RLDP. The Employment Land Study (2023) undertook a review of all existing employment allocations, and outlined the following in respect of the site:

"The site has been on the market for a decade and has only attracted interest for retail and leisure. This may partially reflect the site's peripheral position in the core Barry Docks/Atlantic Trading Estate market area, but also likely the lack of site servicing and access, the costs of which will impact on viability. If judged appropriate on other matters, the commercial use proposed here would at least provide a new access point from which the rest of the site could be opened up for B-Class uses. Even with this new access in place however, it is unclear if the landowner has the resources and interest to market the remaining land for B-Class uses and to translate any market interest generated into concrete development proposals, securing development partners, etc. Thus, the deliverability of this site remains questionable even with the initial access provided. Delivering B-Class uses here may thus require a degree of external support and the land should not be allocated again in the Replacement LDP for B1, B2, B8 uses unless a clear 'way forward' can be agreed to open up the remaining land for relevant development."

Accordingly, the Council have raised concerns regarding the 'deliverability' of the site, in terms of whether any scheme can be delivered on the site for employment purposes. As evidenced through this submission, there is now a 'change in circumstances', where there are interests registered by developers to deliver development at the site.

As such, there is a strong commitment from both the site promoter and the interested developers (which have been evidenced as part of this submission) to bring forward the site within the Plan period, which would bring about significant economic benefits to the Vale and result in the retention of an existing business in the area. The site is in an inherently sustainable location, and has been considered suitable as an allocation previously by the Council, by virtue of the site's allocation in the adopted Plan for employment purposes.

It is also the case that the previous assessments undertaken by the Council of the residential and mixed-use options proposed were positive, with the Council recognising that the land is suitable to accommodate development in Barry – it is only a question of availability, and in turn, deliverability that has resulted in the site not being re-allocated or allocated for a new use in the Plan. This has now changed, as result of the developer interest in the site, and that it is considered that the proposed uses do not raise any concerns in respect of the existing covenant – given that the covenant allows for the delivery of B1, B2 and B8 uses on the site.

On the whole, it is considered that that this submission addresses the concerns raised in the Employment Land Study, and evidences that the site should be re-allocated in the RLDP for industrial use– which represents an appropriate and well-suited location for such uses in Barry.

Development Viability

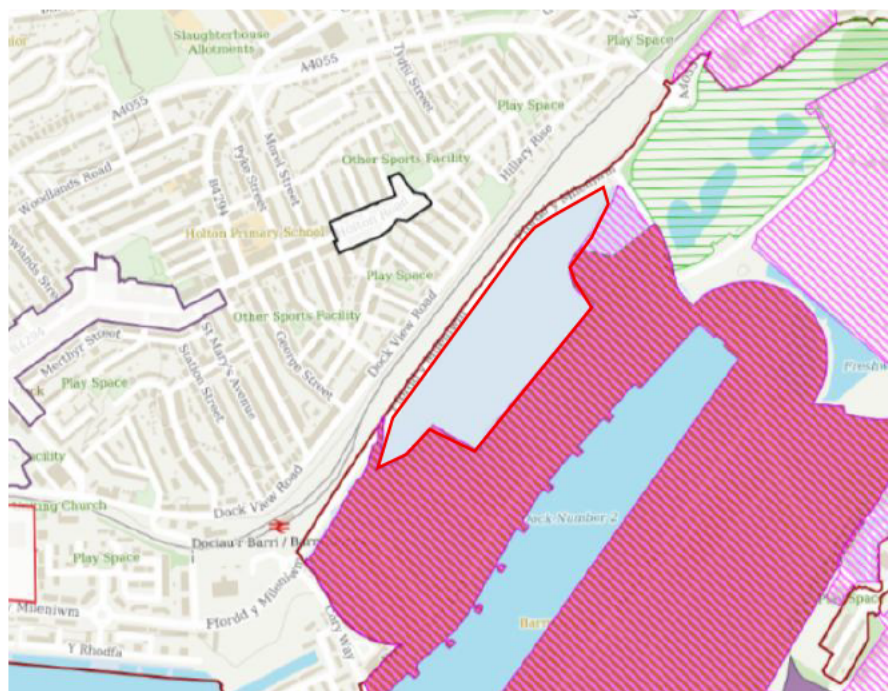
Insofar as to the viability of the proposed uses, to support this submission, a Development Viability Model (DVM) has been completed. As set out within the DVM, a reduced 'Developers Profit' has been applied into the viability appraisal, however, given that the site promoter will not be developing the site themselves, but would take a profit on the sale of the land (allowing Barry Training Services and Vertex Systems to develop out the site), the site is still considered to be viable and deliverable.

As set out within this submission, both parties are looking to expand as a result of the challenges they face with their current facilities, and have identified the site as being a suitable location to develop new facilities to meet their ever-increasing needs. Both sites operate successfully at their current locations, but require more space and capacity which in turn will result in the creation of job opportunities within Barry and the wider Vale of Glamorgan area. Support for the site has therefore been evidenced as part of this submission and there is a desire and ambition from identified businesses to bring the site forward for employment uses.

Settlement Boundary

"The site has not been allocated but has been retained as white land within the settlement, offering an opportunity for it to be redevelopment for employment should this be deliverable in the future."

Notwithstanding this position, the Deposit Plan Proposals Map appear to show the site to be located outside of the settlement boundary, as shown in the extract overleaf:



VofG Deposit Plan Proposals Map – Site Outlined in Red

It is therefore the case that we **object** to the Plan in its current form, as it has failed to follow the recommendations set out in its evidence base, contrary to the provisions of the Development Plans Manual set out above. Separate representations have been submitted to the Deposit Plan outlining our objections to this position.

Test 2 relates to whether the plan is appropriate (i.e. is the plan appropriate for the area in light of the evidence). A sub-question to this test is whether the plan is supported by robust, proportionate and credible evidence.

It is considered that the Plan has failed to follow the evidence base that has been undertaken for the Plan preparation process – given that the settlement boundary has not been redrawn around the site in accordance with the recommendations of the Employment Supplementary Paper (2025). The formulation of a Deposit Plan must be underpinned by the evidence base, which includes the settlement boundary.

Accordingly, notwithstanding the proposed re-allocation of the site, in any event, it should be the case that the site is included within the settlement boundary, which would then follow the recommendations of the evidence base which should inform the Deposit Plan.

Conclusion

Having regard to the above, and in summary, it is considered that the site should be considered acceptable and appropriate as an allocation, in light of the following key factors:

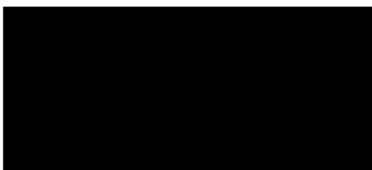
- The Sustainability Appraisal completed for the site confirms that the site has a range of positive impacts through its allocation for employment uses, and could assist in achieving the Plan's Sustainability objectives.
- In respect of assessing the site against the Candidate Site Methodology, the site is considered available for development and has a viable prospect of coming forward in the short term, for delivering further employment land in the plan period.
- The site is in an inherent sustainable location with excellent access to key services and facilities, and public transport.
- The development of the site would bring about significant employment opportunities in a range of different sectors.
- The site has limited constraints, given that it is currently brownfield land and doesn't include any high grade agricultural land.
- The redevelopment of the site has the ability to make a positive contribution to placemaking and wellbeing.
- The site has been considered acceptable as an allocation previously by the Council in their assessment of the previously proposed uses (residential and mixed-use) – it is only the covenant that prohibited the residential development of the site.

We consider that the site 'performs' well against the defined assessment criteria and methodology, with no evident insurmountable constraints, obstacles, or failings. It has been demonstrated above that there are no insurmountable constraints to development of the site, which includes the covenant that was previously a key constraint to the delivery of the previously proposed development. The latest proposals overcome this, which in turn, evidences that the re-allocation of the site is deliverable, and in turn, sound.

Our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters.

We respectfully urge you, for the reasons given herein and in the associated submitted information, to include the site put forward within the emerging LDP to retain its employment allocation.

Yours sincerely



Geraint John
Director
Geraint John Planning Ltd.

