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Dear Sir / Madam

Vale of Glamorgan Replacement Local Development Plan (RLDP)

Representations regarding the Deposit Plan Consultation – 'Crossways Estate, Cowbridge'

Please find enclosed, on behalf of and under instruction from our client, 'Woodwise Limited', representations for consideration as part of Vale of Glamorgan's RLDP Deposit Plan.

Context to these Representations

The above site has been submitted as a Candidate Site as part of the Deposit Plan consultation. The following has been submitted as part of this process:

- Candidate Site Submission (including Sustainability Appraisal and Assessment against Candidate Site Methodology);
- Site Location Plan (dwg ref. A101);
- Illustrative Site Layout plan (dwg ref. A112);
- Development Viability Model (dated March 2026) completed by HRT.

Having regard to the above information submitted, and in summary, it is considered that the site should be considered acceptable and appropriate as an employment site allocation, in light of the following conclusions drawn:

- 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 prosect of coming forward in the short term, for delivering further employment land in the plan period.
- The site has limited constraints, given that it is currently partially brownfield land and doesn't include any high grade agricultural land.
- The only policy destination for the site to overcome would be in relation to the SLA, which could be addressed through a Landscape and Visual Impact Assessment submitted as part of any future application.
- The site is located in the countryside but is brownfield and already a well-established existing business which has been running as an employment site for many years. It is considered that the redevelopment of this site presents an opportunity to develop the site for further uses, in order to realise the sites full potential.
- The site already benefits from existing connections to infrastructure such as water, electricity, gas and the local highway.
- The redevelopment of the site has the ability to make a positive contribution to placemaking and wellbeing.

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 would represent an appropriate existing employment site allocation, with the ability to extend this further. Moreover, the site comprises previously developed land and benefits from existing permissions for its current use. As such, the site should be considered a 'reasonable' option, and should progress to the Stage 3 assessment accordingly.

Given that the site is not currently allocated in the Deposit Plan, we would raise an **objection** to the Plan in its current form, on the basis of the Candidate Site submission. Further details are included below.

Summary of these Deposit Representations – Employment Sites

In light of the Candidate Site Submission made by the site promotor, we would suggest that the site should form an employment allocation within the RLDP. As a result, the site promoter looks to raise an **objection** to the Deposit Plan.

Para 5.7 stats that the RLDP will make provision for *"An allocation of 182 Ha of employment land across a range of sites to enable 67.8 Ha to be brought forward during the plan period and the delivery of up to 5,338 jobs".* It is noted that there are currently a total of 8 sites highlighted as employment allocations in Policy SP14 'Employment Growth'. **Policy EM1** also highlights two 'Employment Regeneration Opportunity Areas'.

Although there is no objection raised to the inclusion of the sites already identified within the policy in principle, it is considered that Crossways Estate site should be considered as both an existing employment site, which is located near to a sustainable settlement, but also has the ability to provide a larger area for employment, which would help to make the existing business more viable. As a result, it is considered that the site should be identified within the **Policy EMP3**.

Policy EMP3 'Protection of Existing Employment Sites and Premises' provides a policy which looks to safeguard existing employment allocations within the Vale. The policy states: *"The following hierarchy of existing employment sites are safeguarded for B1, B2 and B8 employment uses, and will be protected from development which would compromise their role and function".* These are split into Major Employment Sites, Secondary Employment Sites and Key Local Employment Sites. Although Para 6.290 highlights that "Other Premises in Employment Use" are also a type of employment site which has a role and function in the Vale. However, there are a range of smaller and more rural existing employment sites which are not identified or referenced within the policy. We consider that the policy does not go far enough to protect other more rural existing employment sites, such as Crossways Estate.

Policy EMP6 'New Rural Diversification and Employment Uses in the Countryside' provides policy mechanism to support rural employment and diversification in the Vale. However, we consider that the policy does not go far enough to protect and enhance existing employment sites or, provide for opportunities to extend smaller businesses. We would therefore suggest that the following wording is added into Policy EMP6 outlined below in red:

"Proposals for new rural diversification, including tourism facilities, and B1, B2 and B8 employment uses within the countryside outside of defined settlement boundaries or employment areas identified in Policy EMP3 may be appropriate where the proposal is for:

- *The re-use or adaptation of existing commercial premises or ~~an~~ existing rural buildings in association with a rural enterprise or farm diversification scheme;*
- *Small scale new building employment premises that are well related to a rural settlement, or lie within or immediately adjacent to an existing farm building complex;*
- *Employment uses where a countryside location is essential for the operational requirements that cannot be met on an existing employment area;*
- *Sustainable low impact tourism and leisure proposals.*
- *Small-scale extensions to existing employment sites"*

It is considered that the employment strategy for the RLDP should go further to support the delivery of smaller employment sites, which would have the effect of a more balanced and equitable distribution of employment sites apportioned across the entire Plan area – including further sites around Cowbridge. The Employment Land Study (2023) highlights that there is a strong demand for B1, B2 and B8 premises within the rural Vale beyond the traditional rural enterprise and diversification of existing agricultural businesses. The proposed changes to Policy EMP6 would provide further support for existing businesses to redevelop or expand, creating better opportunities on existing sites, where there are limited impacts of redevelopment and expansion. Equally, additional employment allocations should be identified to ensure that the overall need is met over the Plan period. Failure to make the necessary changes to the Plan would bring into question the deliverability of the Plan, and by association, its "soundness".

Conclusion

These representations raise objection to the Deposit Plan – for the reasons set out above.

Given the nature of these representations our clients would be happy to discuss any aspect of the submission made and credentials of the site when your Authority comes to evaluate matters.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely

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Geraint John Planning Ltd.