Agenda Item No: 4

Meeting of:	**Place Scrutiny Committee**
Date of Meeting:	**Tuesday, 17 November 2026**
Relevant Scrutiny Committee:	Place Scrutiny Committee
Item which the Chair has decided is urgent (Part I) **(If yes, why)**	
Urgent Decision Procedure Used (15.14 of the Constitution) **(If yes, why)**	Not applicable
Item Type	Part I
Report Title:	Vale of Glamorgan Replacement Local Development Plan 2021-2036 – Submission for Independent Examination
Portfolio Holder:	Cabinet Member for Community Engagement, Equalities and Regulatory Services
Strategic Leadership Team:	Director of Place
Lead Officer:	Head of Sustainable Development

1.0 What is this report about?

1.1 Following approval at a special meeting of Full Council on 12th January 2026, the Vale of Glamorgan Deposit Replacement Local Development Plan (RLDP) was published for a statutory six-week public consultation between 28th January 2026 and 11th March 2026. This report summarises the responses received from residents and stakeholders as part of the consultation and sets out the next steps in the plan preparation process. It seeks approval to submit the RLDP and its supporting documentation to the Welsh Ministers for an Independent Examination.

1.2 A Consultation Report setting out the consultation process and key issues, together with a summary of the representations and responses is included in Appendix A. The representations register, detailing the full text of all representations, is provided as a background document.

1.3 Appendix B sets out a schedule of proposed Focussed Changes to the Deposit RLDP following the consultation, alongside minor editorial changes and other changes to supporting documents.

2.0 What are the Recommendations?

	Recommendations – What and How?	Reason for Recommendation – Why?
2.1	That Place Scrutiny Committee considers the Officer responses to representations received during the statutory Deposit Replacement Local Development Plan (RLDP) consultation period.	To advise Members of the issues raised during the statutory consultation period.
2.2	That Place Scrutiny Committee considers this report and refers the report and any recommendations to Cabinet for their consideration on 19th November 2026, prior to Cabinet referring this report with the recommendations of the Place Scrutiny Committee and Cabinet's responses to Full Council on 7th December 2026 for consideration and approval.	To comply with Regulation 22 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended).
2.3	That should Place Scrutiny Committee have no recommendations to refer to Cabinet for consideration, that Cabinet would consider the matter as endorsed and the report to be referred to Full Council on 7th December 2026 for: 1) Approval of the proposed changes (Focussed Changes) and minor editorial changes to the Vale of Glamorgan Deposit RLDP in response to representations received; and 2) Approval to submit the RLDP and supporting documentation to Planning Environment Decisions Wales (PEDW) and the Welsh Government for Examination.	To comply with Regulation 22 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended).
2.4	That subject to Place Scrutiny's consideration of Recommendations 2.1 and 2.2 above, or there being no recommendations for Cabinet consideration as detailed in Recommendation 2.3, Cabinet endorse delegated authority to be granted to the Head of Sustainable Development and/or Director of Place to	To make typographical or other minor changes as necessary without the need to seek Cabinet or Full Council approval.

	Recommendations – What and How?	Reason for Recommendation – Why?
	make typographical or other minor changes as necessary prior to the publication of the Focussed Changes consultation and submission for Examination.	
2.5	That subject to Place Scrutiny's consideration of Recommendations 2.1 and 2.2 above, or there being no Recommendations for Cabinet consideration as detailed in Recommendation 2.3, Cabinet endorse delegated authority to be granted to the Head of Sustainable Development, Operational Manager for Planning and Building Control and Principal Planner (Policy) to represent the Council's position at the forthcoming Examination.	To represent the Council's position at Examination without the need to seek Cabinet or Full Council approval.

3.0 What is the background to this report?

3.1 The existing Vale of Glamorgan LDP was adopted in June 2017 and covers the period 2011-2026. Following the adoption of an LDP, Local Authorities are required to annually monitor the performance of the plan, and after 4 years undertake a review of the plan to consider whether there is a need to update or replace the LDP. A review of the adopted LDP was undertaken in June 2021, which concluded that because of changes to national planning policy and the Council's ambitious aspirations, such as responding to the climate and nature emergencies, it was necessary to produce a Replacement LDP (RLDP). Work on the RLDP formally commenced in May 2022.

3.2 Once adopted, the RLDP will provide the Council's planning policy framework for the plan period 2021-2036. Based on a robust evidence base, the RLDP allocates land for development, designates areas for protection and contains policies that provide the basis for the determination of planning applications. The RLDP must be prepared in accordance with an agreed Delivery Agreement (DA), which sets out the timetable for plan preparation and who will be involved in the process and at what stage.

3.3 There are a number of stages involved in plan preparation with statutory and non-statutory consultations undertaken throughout the process. A public consultation was undertaken between December 2023 and February 2024 on the RLDP Preferred Strategy, which set the strategic direction for the development and use of land in the Vale of Glamorgan, identifying how much sustainable growth is needed and where this growth will broadly be located. Following this consultation, an Initial Consultation Report was prepared which summarised and responded to the representations made as part of the consultation. The Initial Consultation Report was considered by Full Council on 30th September 2024, where the Preferred Strategy was endorsed and it was agreed that it should form the basis of the Deposit RLDP.

3.4 Following deliverability issues with a key housing site identified at Preferred Strategy stage on the edge of Barry, a further non-statutory consultation was undertaken between 16th June 2025 and 14th July 2025 on housing growth options in Barry. A report of consultation was considered by Full Council on 1st December 2025, when it was resolved to approve the inclusion of three sites in Barry within the Deposit Plan at Hayes Road, Neptune Road, and at North West Barry.

3.5 Additional non-statutory engagement events on placemaking were also held in respect of the other key sites at St Athan, Dinas Powys and Rhoose to allow local communities to share their views on the master planning of the sites. These events were well attended and have helped to inform the layout and site-specific requirements for the key sites.

3.6 A subsequent report was considered by Full Council on 12th January 2026 where it was approved that the Deposit RLDP be published for statutory public consultation. The consultation was held for a six-week period between 28th January 2026 and 11th March 2026.

4.0 What issues are there to be considered?

Deposit RLDP Consultation

4.1 A total of 1,237 individuals or organisations made representations on the Deposit RLDP, its supporting documents and the candidate site register during the statutory Deposit RLDP consultation period. Many of the representors made more than one representation to the consultation by commenting on different policies and sites and/or more than one candidate site. The number of representations were as follows:

- Deposit RLDP – 2,319 duly made representations, comprising 231 representations of support, 419 comments and 1,669 objections.
- Candidate Sites Register – 350 duly made representations, comprising 42 representations of support, 17 comments and 291 objections.
- Integrated Sustainability Appraisal and Habitat Regulations Assessment – 3 duly made representations, comprising 3 objections.
- Green Infrastructure Strategy – 3 duly made representations, comprising 3 objections.
- Draft Healthy Placemaking Supplementary Planning Guidance – 4 duly made representations, comprising 1 representation of support and 3 objections
- Supporting documents – 25 duly made representations, comprising 5 representations of support, 21 comments and 12 objections.
- In total, there were 2,717 duly made representations, comprising 279 representations of support, 457 comments and 1,981 objections.

4.2 A total of 93 representations were non-duly made. The reasons for representations being considered to be non-duly made were:

- The representation was submitted anonymously and/or no contact details were provided (3 representations)
- The representation was received after the consultation deadline (3 representations)

- The representation was an exact duplicate of one already submitted by the same respondent (87 representations) on the same site/policy/topic. This included the rejection of 59 individual web submissions made by the same respondent.

4.3 A further 6 representations were withdrawn at the request of the respondents.

4.4 The largest number of representations received were in respect of housing site allocations. Full details on the number of representations received on each site is included in the consultation report. In addition petitions were submitted for HG1 KS1 – Land at North West Barry (two petitions – one online and one paper), HG1 KS2 – Land North of Dinas Powys (two petitions – one online and one paper) and HG4.2 – Land west of Maendy Road, Aberthin (online petition).

4.5 In accordance with the approach to handling representations in the Delivery Agreement, petitions will be registered as a valid representation and will be assigned to a lead point of contact. The signing of a petition does not limit the rights of individuals to submit separate formal representations, and many signatories of the petition also submitted separate representations.

Key Issues Raised

4.6 A summary of the key issues raised by policy area is included in the Consultation Report in Appendix A. The consultation report includes a series of annexes which detail the issues raised in the representation and the response to those issues by policy or allocation. Where multiple representors raised similar issues, these have been grouped together and addressed as a composite response. Where composite responses were prepared (primarily in respect of representations on housing allocations) a list of respondents who commented is provided. Where issues raised were unique to a respondent, an individual response has been provided.

Statutory Consultees

4.7 Representations were received on the Deposit RLDP from statutory consultees, including the Welsh Government (WG). The WG's comments were divided into two sections: the first concerning the general conformity of the Deposit RLDP with national and regional planning policy and context, and the second addressing core matters that the Council should consider prior to publication of the Deposit RLDP.

4.8 In respect of the Plan's general conformity, the Welsh Government raised no objections and is of the opinion that the RLDP is in general conformity with the National Development Framework, Future Wales. Furthermore, no objections were raised in relation to key elements of the Plan. This included the RLDP Spatial Strategy and Settlement Hierarchy, the scale of housing and employment growth, affordable housing provision and supporting evidence, the proposed Gypsy and Traveller site provision, and the Council's approach to conserving Best and Most Versatile Agricultural Land (BMV) through the identification of development sites.

4.9 The Welsh Government did seek clarification on several aspects of the Plan and its evidence base, particularly in relation to Welsh Language, district heat networks and minerals. It also sought amendments to policies relating to green infrastructure and biodiversity.

4.10 Natural Resources Wales (NRW) also submitted representations during the Deposit RLDP consultation period. These representations proposed a number of amendments, including specific references to designated sites located in proximity to Key Housing Sites and revisions to the wording of several policies. The changes proposed by NRW and the Welsh Government have been taken into consideration. Further details of the amendments to the Deposit RLDP are set out in the Focussed Changes Document.

4.11 Dwr Cymru Welsh Water (DCWW) provided general comments regarding the capacity of existing water infrastructure to support the employment site allocations within the Plan, building upon information previously submitted at the Preferred Strategy stage. This information has been incorporated into the relevant Plan Appendices.

4.12 Cardiff and Vale University Health Board (CAVUHB) broadly supported the Deposit RLDP, considering it a positive framework for health, wellbeing, placemaking, climate action and sustainable communities. However, they have made comments on how food systems could be embedded within the policy framework and that the plan should update terminology around active travel to refer to 'wheeling' alongside walking and cycling. They note that projected population growth will have an impact on community healthcare facilities and infrastructure, but they recognise the need to prioritise the expansion of their existing estate or support new development to take forward their strategic objectives.

Main Issues by topic

4.13 Section 5 of the Consultation Report provides a summary of the key issues that were raised by policy. The details of the representations and a response to the matters raised is provided in the Annexes to the Consultation Report as follows:

- Annex 1 – Statutory Consultees (WG and NRW)
- Annex 2 – Chapters 1-5 - Policy Context, Characteristics, Vision, Objectives and Strategy and Consultation Process
- Annex 3 – Strategic and Spatial Choices and Placemaking and Good Design
- Annex 4 – Active and Social Places – Housing and Gypsy and Traveller Policies
- Annex 5 – Housing allocations
- Annex 6 – Active and Social Places – Transport, Retail and Community Infrastructure
- Annex 7 – Productive and Enterprising Places – Employment, Climate Change and Waste and Minerals
- Annex 8 – Distinctive and Natural Places – GI, Biodiversity and protecting the natural and built environment
- Annex 9 – Integrated Sustainability Appraisal and Habitats Regulations Assessment
- Annex 10 – New site submissions
- Annex 11 – Candidate sites representations
- Annex 12 – Appendices, Background Papers, Draft Green Infrastructure Strategy and Draft Health Placemaking SPG

4.14 It should be noted that almost every policy in the RLDP received at least one representation. However, for the purposes of this report, the sections of the plan that attracted the most significant number of representations were the following policy areas:

Sustainable Growth Strategy

4.15 As detailed above, the Welsh Government indicated their support for the Sustainable Growth Strategy, confirming that it conforms with national planning policy and Future Wales. Other respondents have also expressed support for the principles of it.

4.16 However, concerns were raised by other about over-development and a lack of infrastructure and/or insufficient infrastructure capacity (highways, education, utilities, health) within specific settlements (including Rhoose, St Athan, Llantwit Major and Barry). Objections were also raised on the grounds of impact on biodiversity, loss of greenfield sites, flooding and the need to protect the Glamorgan Heritage Coast.

4.17 Several representors commented that the strategy did not conform with Future Wales, with one representor believing that the National Growth Area did not apply to the western Vale and others considering that the level of growth proposed was not sufficiently ambitious for a Future Wales National Growth Area.

4.18 Other concerns included the strategic approach to minor rural settlements, which resulted in limited allocations, and the view that an insufficient range of sites had been chosen in terms of size, with few opportunities for smaller developers.

4.19 In terms of the settlement hierarchy, comments were made about the distribution of growth, the justification for settlement classifications, and the flexibility of the policy framework.

4.20 Representations were made in respect of the levels of growth being overly concentrated in certain locations, particularly Barry and Rhoose, placing pressure on infrastructure and services, whilst overlooking opportunities in other parts of the Vale.

Level of Housing Growth

4.21 The housing requirement set out in Policy SP6 has been subject to a wide range of representations, principally concerning its overall scale, evidential basis, spatial distribution, regional alignment and deliverability. Comments have also been made in respect of the conformity with Future Wales, and the implications of updated population and household projections and estimates of housing need, as well as the flexibility allowance.

Housing Allocations

4.22 The majority of representations submitted on the Deposit RLDP related to site-specific housing allocations as identified within Policies HG1, Key Site Policies KS1-5 and Policy HG Rural Affordable Housing Led Sites.

4.23 A composite response to the objections raised on each site is provided in a series of Annexes within the Consultation Report (Appendix A). Whilst there were site specific issues raised on each housing allocation, there were a number of common concerns identified by residents across all sites, as summarised below:

- The impact of new development on the highways network, additional congestion and poor public transport options.
- An in principle objection to the development of greenfield sites and that brownfield sites should be used instead.

- Concern that supporting infrastructure would not be provided or would be provided too late. Reference was made to community infrastructure (e.g. schools, health facilities) and other infrastructure (water, sewerage) being at or over capacity and unable to cope with existing pressures, and that additional housing would place further pressure on such infrastructure.
- Negative impacts of new development on the natural environment including biodiversity, landscape, air quality and the loss of agricultural land.
- Impact of development on built heritage.
- Flood risk both on site and within wider areas.
- No need for additional housing in an area, specifically affordable housing.
- General concerns about impact on amenity, the loss of views, impact on house prices and anti-social behaviour.

4.24 It should be noted that whilst there was a significant level of objection to every site identified for housing, some representations of support were received, referencing the housing crisis and the recognition that new housing can help retain young people in local areas and sustain services and facilities.

Gypsy and Traveller Provision

4.25 A number of representations were also received objecting to identification of a site at Llangan for seven pitches. The key issues raised were around the legal position, the suitability of the location, access, landscape impact, pressure on local services, infrastructure constraints and flooding.

Focussed Changes

4.26 The Welsh Government Development Plans Manual states that changes proposed after the Deposit stage should be avoided wherever possible. However, in exceptional circumstances, there is provision for the Council to propose a limited number of changes to the Plan to ensure that it is sound. These changes, known as 'Focussed Changes', must be limited in number and must not go to the heart of the Plan. It is necessary to undertake consultation on the Focussed Changes before the Examination submission process can be fully completed.

4.27 Detailed consideration has been given to the representations received and it is recognised that some limited changes are needed in response primarily to concerns raised by statutory consultees and to ensure policies are sufficiently clear.

4.28 The Focussed Changes that are proposed include:

- The inclusion of a new strategic policy on the natural environment in response to representations from Natural Resources Wales.
- Substantial rewording of Policy SP20: Biodiversity and Ecological Resilience in light of comments received from statutory consultees.
- Updates to the housing trajectory to reflect the latest housing monitoring data on completions, units under construction, committed sites, revised housing capacities and updated delivery programmes.
- Minor factual updates.
- Minor amendments to the wording of several policies to improve clarity and respond to stakeholder comments.

- The safeguarding of land for two country park extensions under Policy CI1: Open Space Provision, with supporting text recognising their potential to deliver strategic Suitable Alternative Natural Greenspace (SANG).
- Amendments to Appendix 2: Infrastructure Plan to include employment sites and provide factual updates in response to comments made by statutory consultees.
- The inclusion of a list of Supplementary Planning Guidance within Appendix 3: Monitoring Framework.
- The inclusion of a full list of statutorily designated sites within Appendix 7.
- Minor amendments to the Proposals Map, including revisions to the settlement boundary in Barry to incorporate previously developed land at Ffordd y Mileniwm; amendments to the green wedge boundary at Llanmaes to ensure consistency between the Green Wedge Background Paper and the Proposals Map; and the inclusion of the Enterprise Zone boundary.

4.29 The matters that form part of the Focussed Changes consultation are set out in Appendix B. There is also a separate schedule of typographical amendments and minor editorial changes and a list of changes required to supporting background papers.

4.30 As noted above, a significant number of representations were submitted in relation to the housing allocations and the Gypsy and Traveller allocation, and it is recognised that these proposals are of concern within communities. Members will note that these concerns have been given detailed consideration, as fully documented in the consultation report and while the level of objection is recognised, officers remain of the view that these sites represent sound allocations that strike the necessary balance between those impacts, and all of the material planning considerations including the housing crisis, the climate and nature emergencies and national policy to deliver growth in the Vale of Glamorgan. This RLDP must be consistent with the national policy framework, or it is likely to be found unsound. Accordingly, no Focused Changes are proposed to de-allocate any of the housing sites identified in the Deposit RLDP. However, a small number of minor editorial amendments are proposed in response to comments received from consultees. As noted above, the detailed appraisal of those objections is contained in Appendix A.

4.31 Welsh Government guidance advises that Focussed Changes should be consulted upon prior to the submission of the LDP for Examination, but that this should not delay the submission of the Plan. Local planning authorities are advised not to wait until the close of the consultation period before submitting the Plan for Examination, but instead to submit it as soon as practicable following the relevant resolution of the authority. It is therefore intended that the Plan and its supporting documentation be submitted as soon as possible following the Council's resolution.

4.32 Representations made during the Focussed Changes consultation must relate solely to the proposed Focussed Changes. The consultation does not provide an opportunity for representors to add to their original representations or comment on matters unrelated to the proposed changes. Once the Focussed Changes consultation has concluded, all representations received will be forwarded to the appointed Inspector. This is a procedural matter and there is no requirement for the local planning authority to formally respond to the representations received or seek a further Council resolution.

Independent Examination Process

4.33 Once the submission process is complete, an independent Inspector will be appointed on behalf of the Welsh Ministers to examine the Plan. The Examination process will then

commence. If required, a Pre-Hearing Meeting will be held to discuss the arrangements for the hearing sessions. The dates and procedures for the hearing sessions will be determined by the Inspector.

4.34 Individuals and organisations that submitted formal comments or objections during the Deposit Consultation stage have the right to request to speak at the Examination hearing sessions. However, it will be for the Inspector to determine whether an appearance would add value beyond the written evidence already submitted, including whether there is any new evidence or information to be considered. The Inspector will give equal weight to written representations and oral evidence.

4.35 Following the close of the hearing sessions, the Inspector will prepare a report and submit it to the Council. The Council may adopt the RLDP within eight weeks of receiving the Inspector's report.

4.36 In accordance with Welsh Government guidance, and to enable the efficient and timely conduct of the Examination, appropriate arrangements should be put in place to facilitate effective dialogue between the independent Inspector and Council representatives. It is therefore proposed that delegated powers be granted to the Head of Sustainable Development, the Operational Manager for Planning and Building Control, and the Principal Planner (Policy), such that any one of these officers is authorised to negotiate matters arising, agree minor amendments to the RLDP, and respond to requests for further information from the Inspector during the Examination process, including the hearing sessions.

4.37 Where the resolution of issues identified by the Inspector through discussions or requests for further information would involve significant changes to the RLDP, the exercise of these delegated powers will be subject to consultation with the Cabinet Member responsible for Planning in advance of the relevant hearing sessions or deadlines for the submission of information.

4.38 A Programme Officer has already been appointed to manage the day-to-day administration and operation of the Examination process. In line with the RLDP Delivery Agreement, formal approval is sought to submit the RLDP to Planning and Environment Decisions Wales (PEDW) and Welsh Government in December 2026.

5.0 How has evidence been used to inform the report, including the views of others?

5.1 The RLDP is supported by an extensive evidence base, including a series of topic-based papers that explain the rationale underpinning the policies and allocations contained within the Plan. In addition, extensive engagement has been undertaken at each stage of the RLDP process, as detailed in the Consultation Report (Appendix A). The views of stakeholders have helped to inform the development of the Plan's policies and allocations.

6.0 What are the next steps if the recommendations are approved?

6.1 As detailed in Section 4, the Council will commence a consultation on the proposed Focussed Changes to the RLDP and progress the submission of the RLDP to PEDW and Welsh Government for Examination.

7.0 How does this report support Vale 2030 and Reshaping?

7.1 The RLDP will support the Vale 2030 objectives by providing the planning policy framework to support 'creating great places to live, work and visit' and 'respecting and celebrating the environment'

7.2 The RLDP will also help the Council's ambitions for Reshaping Services, including the delivery of Project Zero ambitions.

8.0 How does this demonstrate the Five Ways of Working?

8.1 **Long term** – The RLDP sets out a long-term Vision for how the Authority is expected to change in land use terms over the plan period and provides certainty for developers and the public.

8.2 **Prevention** – The RLDP contains policies that seek to ensure that new development has a positive impact on the economy, the built and natural environment as well as the social and cultural well-being of the Vale of Glamorgan.

8.3 **Integration** – The RLDP considers the PSB Well-being Plan and other relevant corporate strategies and policies that have been adopted by the Council. The influence of the RLDP is relevant to a number of service areas as well as external organisations and agencies.

8.4 **Collaboration** - The RLDP has been subject to extensive statutory consultation in accordance with the LDP Regulations 2005 (as amended) and the Development Plans Manual (Edition 3, 2020) and there has been substantial cross boundary working with neighbouring authorities and those within the wider Cardiff Capital Region. To meet the objectives and targets set out in the RLDP, the Council will work in collaboration with external partners and agencies to ensure their successful delivery.

8.5 **Involvement** - Engagement is a key aspect of the RLDP preparation process and details of this are contained within the Community Involvement Scheme (CIS) section of the DA, which the Local Planning Authority must adhere to.

Resources

9.0 Finance

9.1 There will be financial implications for the Authority in submitting the Plan to PEDW for Examination. The exact cost of the Examination process will depend on a number of factors including the number of Hearing Sessions required, whether Hearing Sessions are held virtually or in person and the number of Inspectors appointed to the Examination. Recent Examinations in Wales have assumed a cost of £100,000 - £150,000. The cost of the Examination will need to utilise Council reserves.

9.2 In addition, the Council must appoint a Programme Officer for the duration of the Examination from submission to adoption. Other potential costs to be incurred during the Examination process could arise from the need to prepare additional evidence and external consultancy support. The cost of consultancy support for the Examination is included in the LDP budget. However, if there are additional costs over and above what is anticipated as a result of matters raised at Examination, these will need to be identified as cost pressures.

10.0 Workforce

10.1 As detailed above, a Programme Officer has been appointed by the Council to organise and administer the Examination. This is a fixed term appointment on a consultancy basis for the duration of the Examination.

11.0 Legal and Equalities

11.1 When the RLDP is submitted for independent Examination, the LPA must publicise the submission and publicise and make available the relevant documentation pursuant to Regulation 22 of the of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005. LPAs should have regard to LDP Examination guidance which sets out the process and issues to consider regarding submission and specifically provides that an LPA must not submit the RLDP unless it considers the plan is ready for Examination. This means that 'unsound' plans should not be submitted for Examination. The LPA will need to demonstrate that the plan meets the three tests of soundness (Does the plan fit? Is the plan appropriate? Will the plan deliver?) set out in Table 27 of the Development Plans Manual (March 2020) and that preparation of the plan has complied with legal and regulatory procedural requirements.

11.2 The Deposit RLDP is supported by an Equalities Impact Assessment and an Integrated Sustainability Appraisal.

12.0 Key Contacts

12.1 **Who are the primary officers to contact with any comments and/or queries on the report?**

Lead Officer: Ian Robinson Head of Sustainable Development irobinson@valeofglamorgan.gov.uk Victoria Morgan Principal Planner (Policy) vmorgan@valeofglamorgan.gov.uk	Democratic Services Officer Mark Thomas Democratic and Scrutiny Services Officer methomas@valeofglamorgan.gov.uk

Appendix

Appendix A – Deposit Replacement Local Development Plan Consultation Report

Appendix B – Schedule of Focussed Changes, Minor Editorial Changes and Other Changes

Background Documents

Vale of Glamorgan Deposit RLDP (Consultation Version)

RLDP Deposit Consultation Representations Register

RLDP Delivery Agreement

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

CONSULTATION REPORT

November 2026



RLDP CDLN

VALE of GLAMORGAN BRO MORGANNWG

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

1. INTRODUCTION

1.1 The Council has a statutory requirement to produce a Local Development Plan (LDP) for the Vale of Glamorgan that manages land and development over the long term, setting out a positive vision for the area that identifies where and how development should take place in the future. The existing Vale of Glamorgan LDP was adopted in June 2017 and covers the period 2011-2026. Following the adoption of the LDP, the Council is required to annually monitor the performance of the plan, and after 4 years undertake a review of the plan to consider whether there is a need to update or replace its LDP. A review of the adopted LDP was undertaken in June 2021, which concluded that because of changes to national planning policy and the Council's new ambitions and aspirations such as addressing climate change, it was considered necessary to produce a Replacement LDP (RLDP). Work on the RLDP was formally commenced in May 2022 and this will replace the existing LDP, once adopted, and will set out where and how new development will take place over the period 2021-2036.

1.2 Regulation 15 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) requires the Council to publish its pre-deposit proposals (Preferred Strategy) for public inspection and consultation before finally determining the content of the Deposit RLDP. The Preferred Strategy was published in December 2023, after a period of pre-deposit plan preparation and engagement. The Preferred Strategy sets out the Vision, Issues, Objectives and broad spatial strategy for the Vale of Glamorgan. The Preferred Strategy is not the final RLDP, and does not include all of the detailed policies, land use proposals or infrastructure required to support development.

1.3 The Vision of the Replacement LDP is to provide a framework that will address the land use issues faced by the Vale of Glamorgan as well as promote and deliver sustainable, vibrant, inclusive, and connected communities where people want to live and work. This will be achieved through the RLDP's Sustainable Growth Strategy that seeks not only to locate sites in places well served by public transport but also targets development in places that reduce the need to travel in the first place through the co-location of housing in places with employment opportunities, services and community facilities. This aligns with the policy requirements of Future Wales, Planning Policy Wales and Llwybr Newydd – the Wales Transport Strategy. The RLDP's Vision will be delivered through 10 strategic objectives that not only reflect national planning policy but also translate how the Council, through land use planning, will ensure that future development contributes to addressing the key issues faced by the Vale and support the opportunities and ambitions for the Vale of Glamorgan and its communities over the lifetime of the plan.

1.4 The Council undertook a 6-week consultation period, as required by regulation 16, for the Deposit plan stage of the RLDP. The Deposit RLDP statutory consultation period took place between Wednesday 28th January 2026 and Wednesday 11th March 2026, in

accordance with the timescales outlined in the Community Involvement Scheme (CIS), which forms part of the Delivery Agreement.

1.5 This Consultation Report has been prepared to outline how the Vale of Glamorgan Council has undertaken public participation and consultation on the Deposit RLDP, thereby fulfilling Regulation 16a of the LDP Regulations (as amended). The report identifies the steps taken to publicise plan preparation as well as the consultation methods used, who was consulted, summaries of the main issues raised, and how the Council considers each representation should be addressed.

2. PRE-DEPOSIT PLAN ENGAGEMENT

2.1 The Council undertook a range of engagement activities prior to the Deposit Plan stage. These are summarised below, but the full details can be found in BP1 Engagement Report Volume 1.

Delivery Agreement

2.2 Before being finalised, the draft Delivery Agreement was subject to a public consultation between 5th November 2021 and 31st January 2022 to obtain the views of stakeholders. A total of 17 respondents provided comments on the draft DA.

2.3 All comments made, and concerns raised were acknowledged and considered by the Council. Subsequently, a number of minor amendments were made to the draft DA, including extending the period for reviewing / updating the evidence base (including ISA /SEA baseline and framework) and the timeframe for preparing the Candidate Site Register and undertaking the site assessments to February 2024. However, no significant changes were made as a result of comments received as it was deemed that the updated DA is robust, realistic and covers the main plan preparation requirements. Also, a number of the issues raised can be more appropriately addressed at later stages of the RLDP preparation process. The consultation responses and proposed changes were considered and approved by Cabinet on 14th March 2022 and Full Council on 25th April 2022. The amended documents were subsequently approved by Welsh Government on 4th May 2022. Specific details of the responses received, and associated comments made by the Council can be found in the relevant Cabinet Report.

Call for Candidate Sites

2.4 The official Call for Candidate Sites, during which promoters were able to submit sites for consideration for potential allocation within the RLDP, took place between 20th June 2022 and 13th September 2022

2.5 Overall, a total of 148 sites were submitted during this period for a range of uses including housing, employment, and renewable energy.

2.6 In accordance with the Council's DA, all stakeholders that had registered their interest in the RLDP process were notified of the Call for Candidate Sites via email or letter.

2.7 A candidate sites register was published providing a map and basic details of the sites that had been submitted.

Integrated Sustainability Appraisal Scoping Report

2.8 This Scoping Report was subject to a public consultation between 24th August 2022 and 29th September 2022; an associated non-technical summary was also prepared and made available to view. Respondents were invited to submit their comments either online or via post although, use of the Council's online consultation portal was encouraged. 4.3. In total, 19 responses were received from a range of organisations and individuals and in relation to the content of the ISA Scoping Report comments were made. These responses, along with the proposed changes, were considered by the Council's appointed consultants and where appropriate, AECOM made amendments to the ISA Framework.

Engagement on the RLDP Issues, Vision and Objectives

2.9 To ensure that the emerging RLDP truly reflects the key Issues that need to be addressed in the Vale of Glamorgan, the Council held a series of engagement workshops with Elected Members, the Vale of Glamorgan Public Services Board (PSB) and Vale Town and Community Councils.

2.10 These workshops provided the opportunity to discuss key Issues within the Vale of Glamorgan, and for stakeholders to provide input into the development of the proposed Vision and Objectives that will set the direction of the RLDP up to 2036. In total 4 Workshops were held in Autumn 2022.

2.11 In advance of the workshops, the Council distributed a survey to all invitees, seeking their views on a variety of topics, ranging from housing to Climate Change. The aim of this survey was to establish the key Issues that the RLDP should address, and ambitions for the future of the Vale of Glamorgan.

2.12 Additional surveys were circulated after each workshop, to gather any feedback which may have been missed during the session, and to offer those who were unable to attend the chance to share their views.

2.13 An additional note was circulated to Elected Members after the workshop on 5th September 2022, which highlighted the key findings and suggested changes from the session.

2.14 Full details of the findings of the engagement can be found in BP1 Engagement Report Volume 1.

Engagement on Growth and Spatial Options

2.15 A series of engagement workshops were held with stakeholders in January and February 2023 to inform the growth and spatial options taken forward and identified in the Preferred Strategy. This involved Elected Members, PSB members, Senior Council Officers and Town and Community Councils.

2.16 In advance of the workshops, the Council distributed a briefing note to all invitees, which outlined the four spatial strategies and potential growth scenarios considered for the RLDP. Additional surveys were circulated after each workshop, to gather any feedback which may have been missed during the session, and to offer those who were unable to attend the chance to share their views. The feedback from these engagement sections can be found in BP1 Engagement Report Volume 1.

Engagement to inform the preparation of the Preferred Strategy

2.17 Focussed engagement was undertaken with specific consultation groups to further develop the Preferred Strategy. This included a Rapid Participatory Impact Assessment (HIA), the findings of which can be found in BP3 Report on the Rapid Participatory Health Impact Assessment of the Preferred Strategy. Workshops were also undertaken with the Equalities Consultative Forum and PSB, the minutes of which are included in BP1 Engagement Report Volume 1.

Preferred Strategy Consultation

2.18 The Preferred Strategy statutory public consultation period took place between Wednesday 6th December 2023 and Wednesday 14th February 2024. This also included consultation on the Integrated Sustainability Appraisal of the Preferred Strategy and Habitats Regulations Assessment of the Preferred Strategy and the candidate sites submitted as part of the first call for sites.

2.19 An Initial Consultation Report was prepared to outline how the Vale of Glamorgan Council undertook public participation and consultation on the Preferred Strategy and to consider the responses received as part of the consultation. This was published as part of the Deposit Plan evidence base.

2.20 In September 2024, the RLDP Initial Consultation Report was considered and agreed at a meeting of Full Council. In agreeing the Initial Consultation Report, Full Council endorsed the actions set out within the document and granted approval to use the Preferred Strategy as a basis for progression on to the next stage of RLDP preparation, the Deposit Plan.

2.21 A second call for sites was also issued alongside the Preferred Strategy consultation in accordance with the Council's Delivery Agreement. A Candidate Sites Register for sites

submitted as part of the second call was published. It should be noted that the some sites submitted in the second call were amendments to sites that had previously been submitted (amended boundaries or alternative uses).

2.22 A commitment was made within the RLDP Initial Consultation Report for site promoters of key housing allocations to undertaken non statutory informal engagement on placemaking with local communities to inform the masterplanning of these sites.

Placemaking Workshops

2.23 For four of the five key sites identified as part of the Preferred Strategy, placemaking sessions were held during Autumn 2024:

- St Athan (joint session for Church Farm and West of St Athan) – 16th October 2024 at Paul Lewis St Athan Community Centre
- Readers Way, Rhoose – 23rd October 2024 at Celtic Way Community Centre
- North of Dinas Powys – 18th October 2024 - Murch Community Centre

2.24 Site promoters hosted the sessions and published information on the sites online, allowing comments to be received in the two weeks following events. After the two-week engagement period site promoters prepared feedback reports, which can be found in the Appendices of BP1A Engagement Report Volume 2.

2.25 A placemaking session was not held on the key site proposed in the Preferred Strategy to the North East of Barry due to concerns around the deliverability of the site due to land ownership issues.

Housing Growth in Barry

2.26 In May 2025, a report was presented to Cabinet advising that the North East Barry site was not proposed to be taken forward into the Deposit Plan. Following Cabinet approved that a public consultation should be carried out on three alternative sites in Barry, including a key site at North West Barry for 376 dwellings, and two smaller sites. A consultation was held between the 16th of June and 14th July 2025 and included a site-specific placemaking event held on 24th June 2025 at Millwood Bowling Club. This session was attended by both the Council and the site promoters for Land at North West Barry and their technical experts.

2.27 The consultation event was held in tandem with the wider Housing Growth in Barry consultation and a report on the outcome of this consultation was reported to Cabinet on the 6th of November 2025. The full Housing Growth in Barry Report of Consultation was also published as part of the site specification information for Land at North West Barry.

Engagement to inform the preparation of the Deposit Plan

2.28 A second Rapid Participatory Health Impact Assessment (HIA) was undertaken in September 2025 to inform the policies of the Deposit RLDP. The HIA workshop was arranged and hosted by the Council and facilitated by the Wales Health Impact Assessment Support Unit. An overview of the Replacement LDP and the Deposit Plan was provided to participants as well as an overview of the local population health needs. Following the presentations, discussions were held with the workshop participants in two sessions to consider the wider determinants of health and how the policies within the Deposit Plan may impact on the health and well-being of the population, and how these impacts could be addressed or mitigated. Further details of the session and its outcomes are identified in the BP3A Report on the Rapid Participatory Health Impact Assessment of the Deposit Plan.

2.29 Officers also attended a meeting of the PSB to explain how the proposals and policies related to the PSB's Well-being Plan, and specifically their objectives and priority workstreams. A draft copy of the Deposit RLDP was circulated to PSB members for comment.

3. DEPOSIT PLAN - CONSULTATION METHODS

3.1 Effective community involvement is a key aim that the RLDP must meet to ensure a wide range of views are considered whilst building its strategy and policies. The Council used a variety of means of consultation and methods through which representations could be made at Deposit stage to encourage engagement and participation with the widest audience possible in accordance with the CIS, which forms part of the Delivery Agreement.

3.2 Engagement on the RLDP was led by the Planning Policy team and undertaken in line with the Council's Public Participation Strategy. The Public Participation Strategy sets out how the Council seeks to encourage and facilitate public participation in the Vale of Glamorgan and the Council used a range of engagement methods, including social media platforms, face-to-face engagement sessions, and made use of community connectors to engage seldom heard groups in consultation.

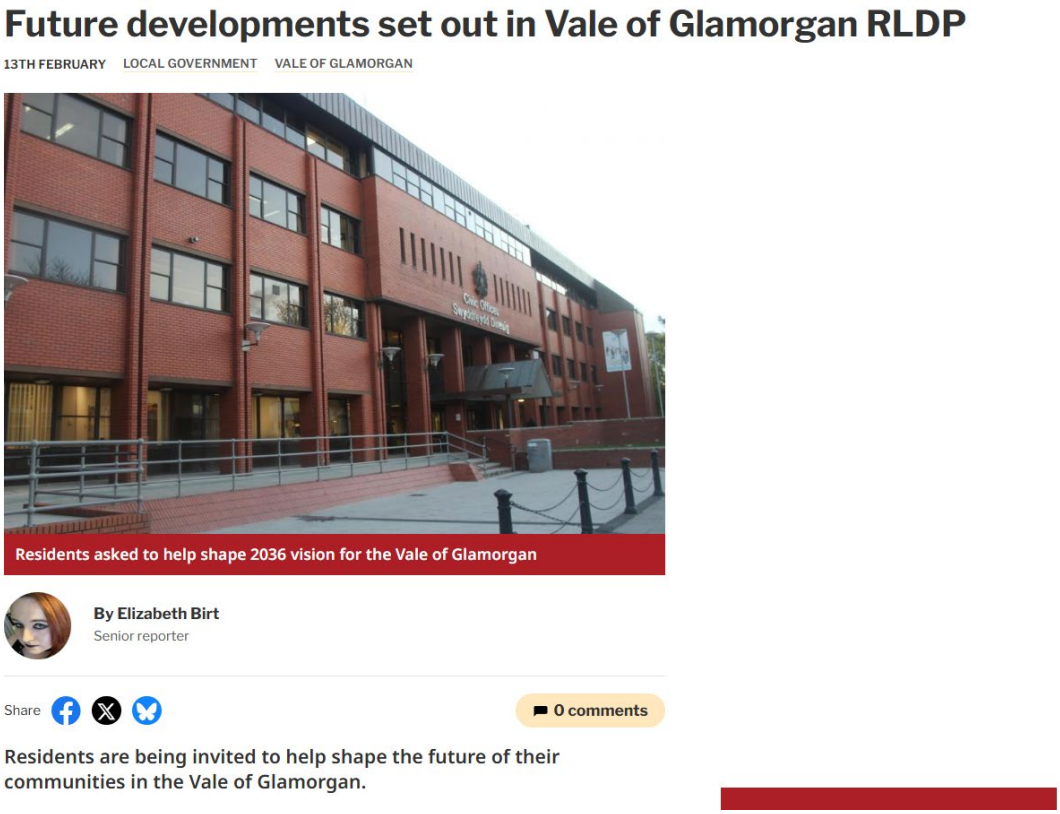
3.3 The key methods of engagement were set out below:

Local Advertisement

3.4 Posters were displayed advertising the consultation in the Council run libraries and consultation venues. These posters included a QR code which could be scanned to take users directly to the consultation page of the website. Copies of a leaflet were also available in local libraries detailing the key points of the consultation and how people can have their say.

3.5 Site notices were also displayed advertising the consultation at all housing and employment sites included within the RLDP. The site notices showed a map locating the site and detailed the proposed use, also featuring a QR code which if scanned linked directly to the consultation page of the website.

3.6 There is no longer a statutory requirement for a formal notice to be published in local newspapers. However, a press release in relation to the Deposit RLDP was given to local outlets, which led to the published article within Barry and District News on the 13th of February. Other local news outlets, such as the Glamorgan star, also reported on the Deposit RLDP.



Future developments set out in Vale of Glamorgan RLDP

13TH FEBRUARY LOCAL GOVERNMENT VALE OF GLAMORGAN

Residents asked to help shape 2036 vision for the Vale of Glamorgan

By Elizabeth Birt
Senior reporter

Share 0 comments

Residents are being invited to help shape the future of their communities in the Vale of Glamorgan.

Figure 1: Article on Barry and District News

Council Website and Public Inspection

3.7 A dedicated consultation page, including the package of consultation documents, was published on the Vale of Glamorgan Council's consultation website and Participate Vale, with links from the main Planning pages of the Council's website. Throughout the consultation period there were over 1500 visits to this page. An email was sent to 4,183 residents, who have subscribed via Participate Vale to be kept informed of any consultations. The email was sent on 29 January and was opened by 2,460 residents. There was a total of 349 clicks on links embedded within the email. A formal notice advising of the consultation was also placed on the Council's website. A screenshot of the consultation page is provided in Figure 2 below.

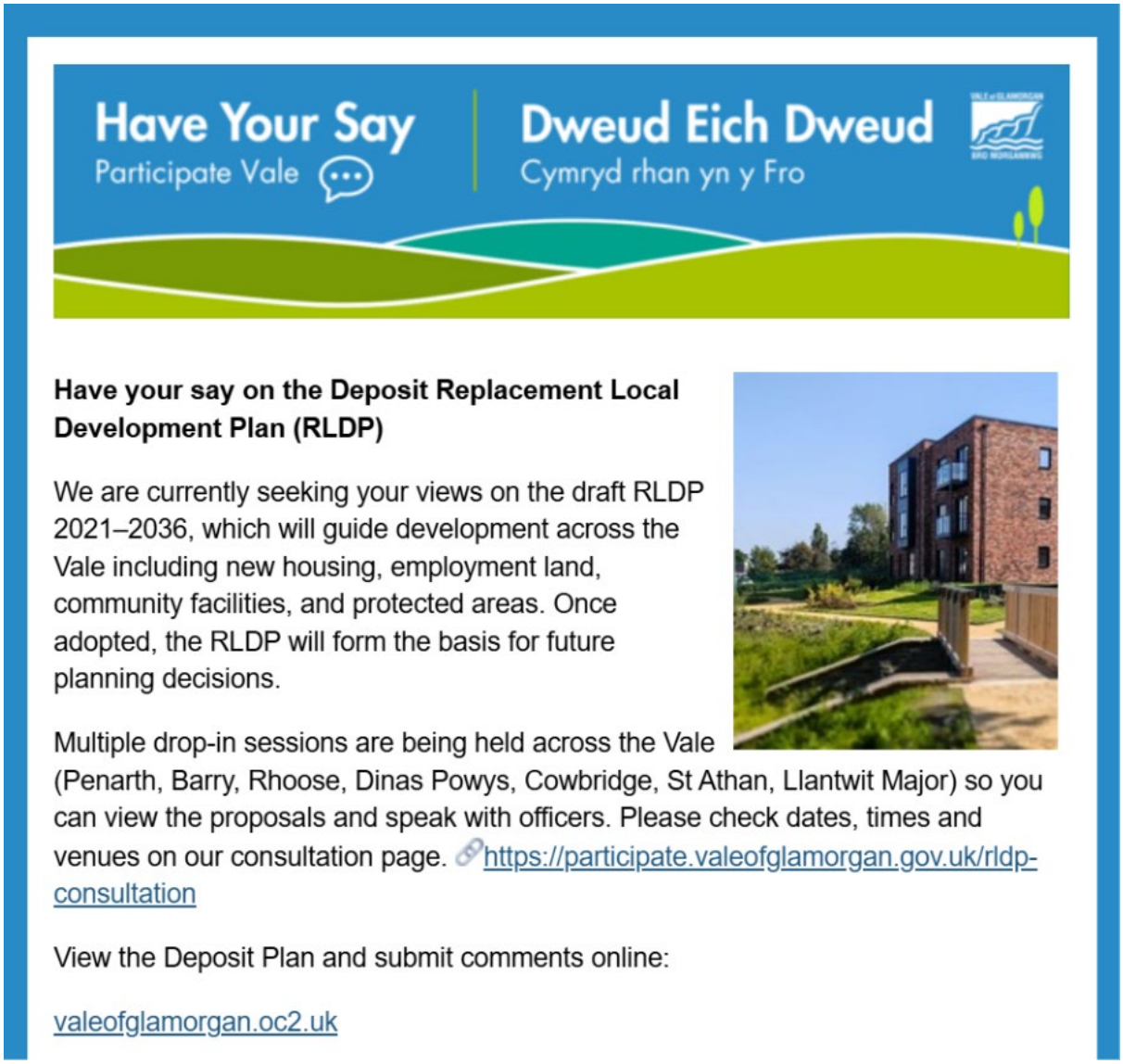
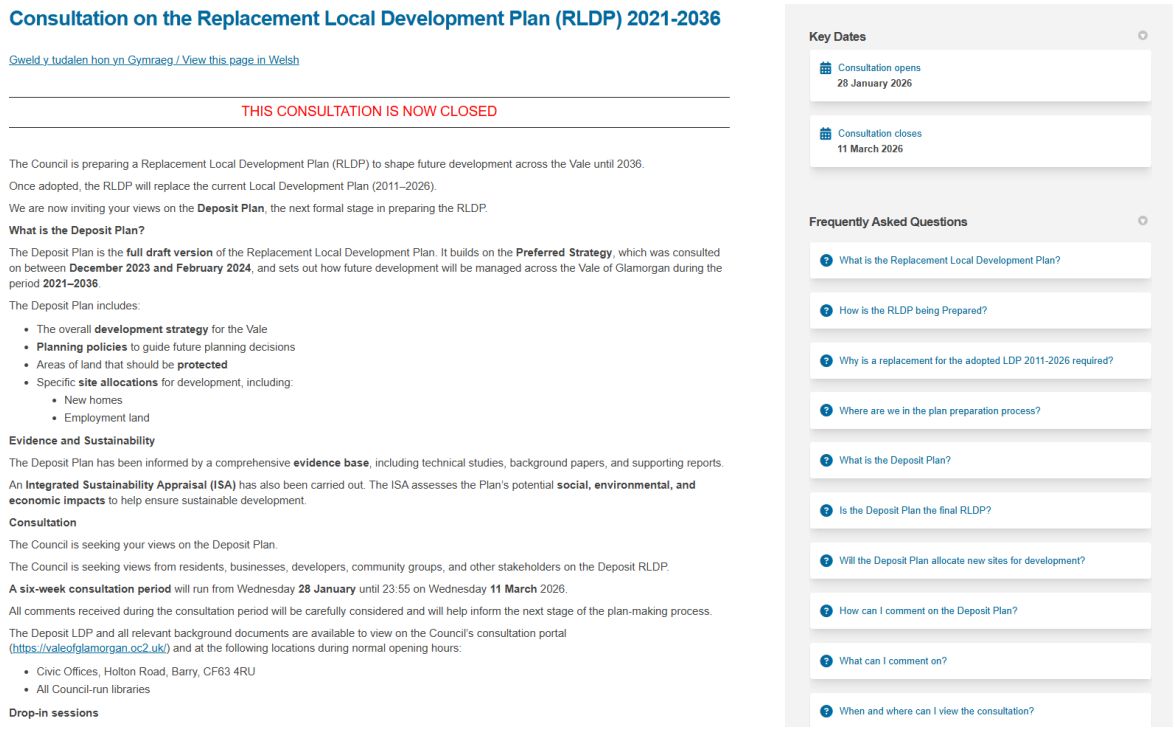


Figure 2: Participate Vale Consultation Page

3.8 A series of frequently asked questions (FAQ's) and answers were provided on the Councils' dedicated consultation website, Participate Vale to clarify any common queries and to aid the public through the consultation process. The FAQ's included general queries on the LDP process and the Deposit RLDP as well as how to view the documents, how to make comments and what will happen after the end of the Deposit RLDP consultation. Figure 3 provides an image capture of the FAQs listed on the council's website.

3.9 An online representation form was made available in addition to the online consultation database for respondents to download, complete an electronic response and submit the form by email to LDP@valeofglamorgan.gov.uk. Respondents were also provided with the option to print the downloaded representation form to complete by hand and submit by post to the LDP team at the Civic Offices, if preferred or for accessibility reasons.



Consultation on the Replacement Local Development Plan (RLDP) 2021-2036

Gweld y tudalen hon yn Gymraeg / View this page in Welsh

THIS CONSULTATION IS NOW CLOSED

The Council is preparing a Replacement Local Development Plan (RLDP) to shape future development across the Vale until 2036.

Once adopted, the RLDP will replace the current Local Development Plan (2011–2026).

We are now inviting your views on the **Deposit Plan**, the next formal stage in preparing the RLDP.

What is the Deposit Plan?

The Deposit Plan is the **full draft version** of the Replacement Local Development Plan. It builds on the **Preferred Strategy**, which was consulted on between **December 2023 and February 2024**, and sets out how future development will be managed across the Vale of Glamorgan during the period **2021–2036**.

The Deposit Plan includes:

- The overall **development strategy** for the Vale
- **Planning policies** to guide future planning decisions
- Areas of land that should be **protected**
- Specific **site allocations** for development, including:
  - New homes
  - Employment land

Evidence and Sustainability

The Deposit Plan has been informed by a comprehensive **evidence base**, including technical studies, background papers, and supporting reports.

An **Integrated Sustainability Appraisal (ISA)** has also been carried out. The ISA assesses the Plan's potential **social, environmental, and economic impacts** to help ensure sustainable development.

Consultation

The Council is seeking your views on the Deposit Plan.

The Council is seeking views from residents, businesses, developers, community groups, and other stakeholders on the Deposit RLDP.

A six-week consultation period will run from Wednesday **28 January** until 23:55 on Wednesday **11 March** 2026.

All comments received during the consultation period will be carefully considered and will help inform the next stage of the plan-making process.

The Deposit LDP and all relevant background documents are available to view on the Council's consultation portal (https://valeofglamorgan.oc2.uk/) and at the following locations during normal opening hours:

- Civic Offices, Holton Road, Barry, CF63 4RU
- All Council-run libraries

Drop-in sessions

Key Dates

Consultation opens
28 January 2026

Consultation closes
11 March 2026

Frequently Asked Questions

- What is the Replacement Local Development Plan?
- How is the RLDP being Prepared?
- Why is a replacement for the adopted LDP 2011-2026 required?
- Where are we in the plan preparation process?
- What is the Deposit Plan?
- Is the Deposit Plan the final RLDP?
- Will the Deposit Plan allocate new sites for development?
- How can I comment on the Deposit Plan?
- What can I comment on?
- When and where can I view the consultation?

Figure 3: Deposit RLDP Consultation Page, Participate Vale

3.10 Bilingual printed copies of the Deposit RLDP, representation forms, Integrated Sustainability Assessment (ISA), Habitats Regulations Assessment (HRA) and any key accompanying documents were placed within all Council-run libraries and the Council's Civic Centre. The documents were available for public viewing during the usual opening hours. Bilingual hard copies of the Deposit RLDP documents and representation forms were also made available at all 7 in-person drop-in consultation sessions to be taken, filled out and posted to the LDP team at the Civic Offices or scanned and emailed to LDP@valeofglamorgan.gov.uk. The full evidence base was published on the Council's consultation portal and, if necessary, was accessible to the public through computers available in both Council and community-led libraries.

3.11 For supporting documents prepared by the Council, Welsh-language versions of the executive summaries were provided. Documents produced by external organisations or submitted by third parties as supporting information for proposed site allocations, were not translated, as they were not prepared by the Council and were published in their original form.

Social Media

3.12 The consultation was promoted through the Council's social media channels such as Facebook, and Instagram. The Facebook post on the 29th of January 2026 reached 23.3k people and had 36 interactions. A copy of the post can be seen in Figure 4 below. Interactions can mean viewing an image, clicking on a link, expanding the text to 'read more', sharing the post or commenting on it.

3.13 The consultation was also promoted on Instagram on the 29th of January 2026, with the post receiving 429 views and 5 interactions. The full statistics of the Councils social media channels can be seen below in Figure 5. Elected members were asked to share information and many ward members posted details of the consultation on their local community social media. The in-person drop-in public information sessions were also promoted through the Council's social media channels, including updates and reminders via Facebook stories.

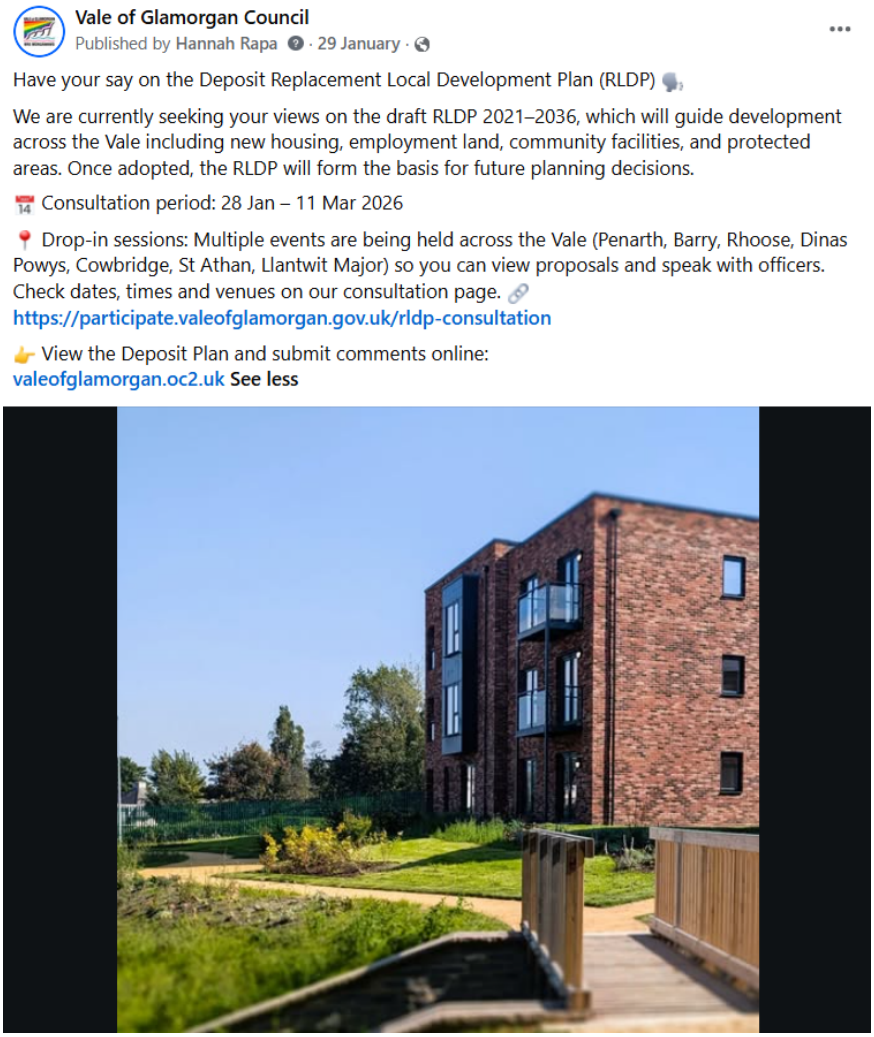


Figure 4: Facebook Post from January 29th, 2026

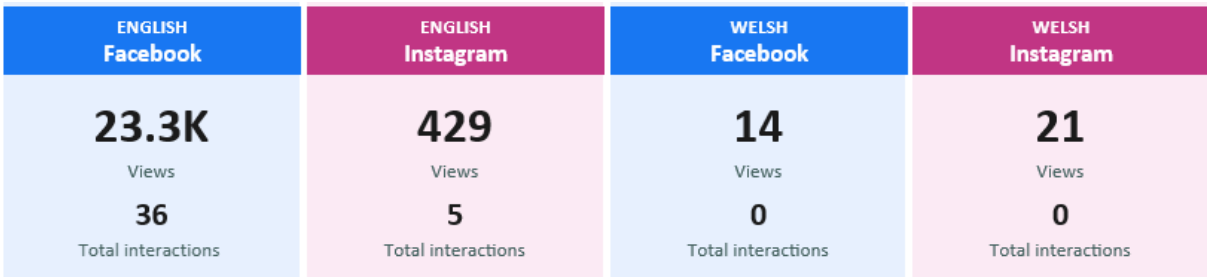


Figure 5: Statistics from Councils Social Media posts

LDP Consultation Database

3.14 Each individual and organisation listed on the LDP Consultation Database, including anyone who provided their contact details in order to be informed of any developments related to the RLDP, were notified by letter or email, based on their chosen preference, to inform them of the start of the Deposit RLDP Consultation. In total, nearly 2000 representors were contacted and provided with background information, details on how to access the consultation documents as well as how to make comments and where to find information on the public engagement sessions.

3.15 A detailed list of the bodies engaged during the Preferred Strategy and the Deposit RLDP Consultation is provided in the Delivery Agreement (Revised December 2025) and in Annex 9 of this document. As the consultation progressed, additional representors were added to the database upon request.

Public Engagement Sessions

3.16 Public Information drop-in sessions were hosted during the consultation period to provide residents the opportunity to discuss the Deposit RLDP, clarify any queries or concerns and be informed of the formal process of making representations. A minimum of three Planning Policy Officers were present at each of the 7 drop-in sessions. Bilingual hard copies of the Deposit RLDP, supporting documentation and all representation forms were made available at each session as well as bilingual exhibition boards that documented key elements of the Deposit RLDP and all the proposed Key Sites identified in the plan. The 7 drop-in sessions were all held in January and February 2026, in accordance with the advertised timetable as follows:

Location	Date	Time
Penarth – Belle Vue Community Centre	Friday 30th January	15:30 – 18:30
Barry – Barry Memo Arts Centre	Monday 2nd February	15:30 – 18:30
Rhoose – Celtic Way Community Centre	Wednesday 4th February	15:30 – 18:30
Dinas Powys – Murchfield Community Centre	Friday 6th February	15:30 – 18:30

Cowbridge – Cowbridge Town Hall	Tuesday 10th February	15:30 – 18:30
St Athan – Paul Lewis St Athan Community Centre	Wednesday 11th February	15:30 – 18:30
Llantwit Major – CF61 Centre	Friday 13th February	14:00 – 17:00



Figure 4: Public Information Drop-in Session at Murchfield Community Centre, February 2026

Planning policy duty line and LDP mailbox

3.17 Officers were available to answer any queries the public had on the consultation during working hours throughout the consultation, either by phone or by email.

Stakeholder Engagement

3.18 The Council undertook engagement activities with specific groups, including the 50+ Forum and Tenants Forum which are traditionally considered harder to reach. The consultation was also circulated to members of the Equalities Consultative Forum.

3.19 During the consultation period, members of the Council's Planning Policy Team attended the 50+ Forum on the 18th February 2026 and the Tenants Forum on the 19th February 2026. These sessions included a presentation of relevant proposals and policies in the Deposit Plan, an explanation of the consultation process and assistance with making formal comments where required.

3.20 In addition, the Deposit Plan was advertised on the weekly ConnectED bulletin on the 22nd January 2026 to raise awareness of the consultation and extend engagement opportunities to groups and individuals reached through Education Services. The ConnectED is circulated to all schools in the Vale of Glamorgan.



Figure 5: Extracts from ConnectED Bulletin, January 2026.

Accordance with the Delivery Agreement (Revised January 2026)

3.21 The Consultation of the Deposit RLDP, Initial ISA Report/HRA has been undertaken in accordance with the methods of engagement that the Council committed to in Appendix 2 of the Delivery Agreement (DA) (Revised January 2026).

3.22 The Council has publicised the RLDP at each stage of the process to reach as many interested parties as possible and to encourage active engagement in the process. The methods used to facilitate engagement and consultation are outlined under the relevant headings within the DA below.

Direct contact (primarily via email or letter where required in either Welsh or English)

3.23 Direct notifications were sent to each individual and organisation listed on the LDP Consultation Database by email or letter, based on their chosen preference, to inform them of all developments related to the RLDP. Only one request for correspondence in Welsh was received. Accordingly, the individual concerned has been, and will continue to be, contacted in Welsh.

Leaflets / Newsletters / Posters

3.24 To advertise the consultation, in accordance with the DA, an RLDP Consultation poster was produced and placed in the Council offices, Council run libraries and consultation venues. The bilingual consultation poster provided a brief background and advertised the date, time, and place of all the public engagement sessions available as well as how

to make comments and the deadline for doing so. These posters included a QR code which could be scanned to take users directly to the consultation page of the website. Copies of a leaflet were also available in local libraries detailing the key points of the consultation and how people could have their say.

The use of the Council's social media accounts

3.25 The consultation was promoted through the Council's social media channels such as Facebook, and Instagram. The Facebook post on the 29th of January 2026 reached 23.3k people and had 36 interactions. The consultation was also promoted on Instagram on the 29th of January 2026, with the post receiving 429 views and 5 interactions. The in-person drop-in public information sessions were also promoted through the Council's social media channels, including updates and reminders via Facebook stories.

Engagement with elected members through workshops, briefings, drop-in sessions and in reports to appropriate Council meetings

3.26 As part of the political reporting of the Deposit Plan, a scrutiny committee meeting was held where all elected members, including both committee and non-committee members, had the opportunity to ask questions and raise concerns about policies and allocations in the Plan. The minutes of the scrutiny meeting set out the matters discussed. In addition, all elected members were contacted directly at the start of the consultation. Elected members were also asked to dissemination information to residents in their area and many ward members posted details of the consultation on their local community social media. Elected members were also able to attend any of the Public Information drop-in sessions.

Press releases for the local media, where appropriate

3.27 There is no longer a statutory requirement for a formal notice to be published in local newspapers. However, a press release in relation to the Deposit RLDP was given to local outlets, which led to the published article within Barry and District News on the 13th of February. Other local news outlets, such as the Glamorgan star, also reported on the Deposit RLDP.

Preparing documents which help people to engage in the key stages of the process e.g. easy read versions, summary documents

3.28 An Easy Read version of the Deposit Plan was made available online, in Council-led libraries and at the drop-in consultation sessions. Executive summaries were provided in lengthy background documents and for supporting documents prepared by the Council, Welsh-language versions of the executive summaries were also provided.

Public Information exhibitions, drop-in sessions or virtual exhibitions

3.29 A series of Public Information drop-in sessions were hosted during the consultation period to provide residents the opportunity to discuss the Deposit RLDP, clarify any queries or concerns and be informed of the formal process of making representations. Bilingual exhibition boards that documented key elements of the Deposit RLDP and all the proposed Key Sites identified in the plan were made available at each session. The 7 drop-in sessions were all held in January and February 2026, in areas within, or in close proximity to, the locations of housing allocations identified in the Plan.

Virtual engagement and consultation via web-based technology such as webinars

3.30 While no virtual engagement sessions or webinars were held at this stage, the Council did make use of web-based technology to facilitate participation in the consultation process. This approach reflected the poor attendance and limited levels of meaningful engagement experienced during online sessions undertaken at the Preferred Strategy stage. Additionally, Appendix 2 of the Delivery Agreement refers to webinars as an example of a public engagement session, alongside exhibitions and drop-in sessions, rather than a requirement. Having regard to the stage of plan preparation and previous engagement outcomes, the Council considered that face-to-face Public Information drop-in sessions would be the most effective engagement tool.

3.31 The Council hosted a dedicated RLDP consultation portal which could be accessed through the Council's website or Participate Vale. This provided stakeholders with access to consultation documents, supporting evidence and information on how to engage with the process. Throughout the consultation period, Planning Policy Officers were also available to respond to enquiries and provide assistance via telephone, email and the online contact form available through the consultation portal. Throughout the consultation period, support was available from the Planning Policy Team by telephone, email, the online contact form available through the consultation portal as well as during consultation events. The effectiveness of these digital engagement methods is demonstrated by the fact that approximately 50% of all representations received were submitted through the online consultation portal.

Site notices will be displayed for proposed land allocations at the Deposit Plan stage

3.32 Site notices were displayed advertising the consultation at all housing and employment sites included within the RLDP. The site notices showed a map locating the site and detailed the proposed use, also featuring a QR code which if scanned linked directly to the consultation page of the website.

3.33 The Council followed the methods of engagement listed within the DA, however, in a small number of cases it was not possible to consult with general consultation bodies listed in Annex 9 of the report as the organisations no longer exist. Where this was the case, alternative organisations with a similar remit were identified where possible.

4. RESPONSES TO THE PUBLIC CONSULTATION

4.1 A total of 1,237 individuals or organisations made representations on the Deposit RLDP, its supporting documents and the candidate site register during the statutory Deposit RLDP consultation period. Many of the representors made more than one representation to the consultation by commenting on different policies and sites and/or more than one candidate site. The number of representations were as follows:

- Deposit RLDP – 2,319 duly made representations, comprising 231 representations of support, 419 comments and 1,669 objections.
- Candidate Sites Register – 350 duly made representations, comprising 42 representations of support, 17 comments and 291 objections.
- Integrated Sustainability Appraisal and Habitat Regulations Assessment – 3 duly made representations, comprising 3 objections.
- Green Infrastructure Strategy – 3 duly made representations, comprising 3 objections
- Draft Healthy Placemaking Supplementary Planning Guidance – 4 duly made representations, comprising 1 representation of support and 3 objections
- Supporting documents – 25 duly made representations, comprising 5 representations of support, 21 comments and 12 objections.
- In total, there were 2,717 duly made representations, comprising 279 representations of support, 457 comments and 1,981 objections.

4.2 In total, 50% of representations were submitted using the online consultation portal, 40% were submitted by email (including completed response forms that were emailed to the Council) and 10% were submitted on paper, either as completed representation forms or letters that were either posted or handed in.

4.3 A total of 93 representations were non-duly made. The reasons for representations being considered to be non-duly made were:

- The representation was submitted anonymously and/or no contact details were provided (3 representations)
- The representation was received after the consultation deadline (3 representations)
- The representation was an exact duplicate of one already submitted by the same respondent (87 representations) on the same site/policy/topic. This included the rejection of 59 individual web submissions made by the same respondent.

4.4 A further 6 representations were withdrawn at the requested of the respondents.

4.5 Several petitions were submitted during the Deposit RLDP process. These are detailed below:

- HG1 KS1 – Land at North West Barry – online petition – 272 signatures.
- HG1 KS1 – Land at North West Barry – paper petition – 217 signatures.
- HG1 KS2 – Land North of Dinas Powys – online petition – 1,376 signatures.
- HG1 KS2 – Land North of Dinas Powys – paper petition – 377 signatures.
- HG4.2 – Land west of Maendy Road, Aberthin – online petition – 103 signatures.

4.6 In accordance with the approach to handling representations in the Delivery Agreement, petitions will be registered as a valid representation and will be assigned to a lead point of contact. The signing of a petition does not limit the rights of individuals to submit separate formal representations, and many signatories of the petition have also submitted separate representations.

4.7 As part of the Deposit RLDP consultation, a total of 11 new sites were submitted. These comprised:

- 5 new sites proposed for housing that were not previously considered through the RLDP candidate site process
- 1 new site proposed for employment that was not previously considered through the RLDP candidate site process.
- 1 new site proposed for countryside management uses.
- 1 previously submitted site with a smaller site boundary.
- 3 sites previously submitted as candidate sites that were proposed for alternative uses to the previous submission – one for commercial use rather than housing, one for industrial rather than housing/mixed uses and one for affordable housing led rather than open market housing led.

4.8 A new site submission register has been published, which is available to view on the Council's consultation website. A summary of the suitability of the submitted sites is included in Appendix 10.

4.9 The Council's responses to representations made on the Deposit Plan have been provided either as individual responses or, where appropriate, as a composite response. Within composite responses, representations have been grouped by common themes and issues. Where comments are presented as individual responses, these generally comprise a summary of the representation for the purposes of this report. However, the full representation and any supporting documentation have been considered in every instance. In both individual and composite responses, all matters raised by representors have been fully considered and addressed through detailed Council responses, including, where necessary, amendments to the Plan.

4.10 Composite responses have been produced for representations made on all Key Sites, Housing Allocations and Rural Affordable Housing Led Sites as well as representations

made on the wider HG1 Housing Allocations Policy, the Consultation process, Major Employment Allocation SP14.2 Land south of Port Road (Model Farm), Rhoose, Gypsy and Traveller Site Provision and Accommodation, allocation TR1.6 Highways Improvement - Weycock Cross Roundabout, both allocations within Policy SP12 Retail Floorspace Provision and Policy CC1 Residential Operational Net Zero Development.

4.11 The representations received on the candidate sites register included site promoters supporting sites that they had submitted, and residents/organisations objecting to the principle of specific candidate sites. A summary of the number of representations received on each candidate site is included in Appendix 11, together with the reason

5. KEY ISSUES RAISED

STATUTORY CONSULTEES

5.1 Representations were received on the Deposit RLDP from statutory consultees, including the Welsh Government (WG). The WG's comments were divided into two sections: the first concerning the general conformity of the Deposit RLDP with national and regional planning policy and context, and the second addressing core matters that the Council should consider prior to publication of the Deposit RLDP.

5.2 In respect of the Plan's general conformity, the Welsh Government raised no objections and is of the opinion that the RLDP is in general conformity with the National Development Framework, Future Wales. Furthermore, no objections were raised in relation to key elements of the Plan, including the RLDP Spatial Strategy and Settlement Hierarchy, the scale of housing and employment growth, affordable housing provision and supporting evidence, the proposed Gypsy and Traveller site provision, and the Council's approach to conserving Best and Most Versatile Agricultural Land (BMV) through the identification of development sites.

5.3 The Welsh Government did, however, seek clarification on several aspects of the Plan and its evidence base, particularly in relation to Welsh Language, district heat networks and minerals. It also sought amendments to policies relating to green infrastructure and biodiversity.

5.4 Natural Resources Wales (NRW) also submitted a number of representations. These representations proposed a number of amendments, including specific references to designated sites located in proximity to Key Housing Sites and revisions to the wording of several policies. The changes proposed by NRW and the Welsh Government have been taken into consideration. Further details of the amendments to the Deposit RLDP are set out in the Focussed Changes Document.

5.5 Dwr Cymru Welsh Water (DCWW) provided general comments regarding the capacity of existing water infrastructure to support the employment site allocations within the Plan, building upon information previously submitted at the Preferred Strategy stage. This information has been incorporated into the relevant Plan Appendices.

5.6 Cardiff and Vale University Health Board (CAVUHB) broadly supported the Deposit RLDP, considering it a positive framework for health, wellbeing, placemaking, climate action and sustainable communities. However, they have made comments on how food systems could be embedded within the policy framework and that the plan should update terminology around active travel to refer to ‘wheeling’ alongside walking and cycling. They note that projected population growth will have an impact on community healthcare facilities and infrastructure but they recognise the need to prioritise the

expansion of their existing estate or support new development to take forward their strategic objectives.

5.7 The Designing Out Crime Officer for South Wales Police have made comments on how policies in the plan could respond to their objectives on preventing crime and disorder and enhancing community safety and have asked to be consulted on a number of types of development at planning application stage.

5.8 The Defence Infrastructure Organisation (DIO) Safeguarding Team for the Ministry of Defence have provide site specific comments on consultation requirements for sites within the safeguarding zone for MOD St Athan and have identified amendments to the wording of Policy EMP2 on MOD St Athan.

5.9 A number of representations were also received from specific Town and Community Councils relating primarily to proposed sites within their respective areas.

OTHER CONSULTEE RESPONSES

5.10 In addition to representations from statutory consultees, representations were received from a range of stakeholders, including members of the public, community groups and non-statutory organisations. The responses and issues raised through the consultation were varied, with many organisations and private individuals commenting on several areas of the Deposit RLDP. The key issues raised are summarised in plan order.

STRATEGIC AND SPATIAL CHOICES

CHAPTER 2 - NATIONAL, REGIONAL AND LOCAL POLICY CONTEXT

5.11 Welsh Government confirmed that the RLDP is in general conformity with national policy, including Future Wales, the National Development Framework and welcomed the joint working that has been undertaken by the Vale and neighbouring authorities. There was also support from other organisations and individuals.

5.12 However, a number of issues were raised by other respondents including the need for stronger references to designated sites, advanced warning of future policy changes such as the publication of the third review of Regional Technical Statement on Aggregates and concerns about infrastructure and addressing the climate and nature emergencies.

CHAPTER 3 - THE VALE OF GLAMORGAN KEY CHARACTERISTICS

5.13 Four duly made representations were received in relation to the Key Characteristics section of the Plan. These included one representation in support and three objections: one concerning the statement that Barry is the most sustainable location for development in the Vale, one relating to Census data, and one concerning smaller rural settlements and hamlets in relation to the settlement hierarchy.

CHAPTER 4: KEY THEMES, VISION AND OBJECTIVES

Key Themes

5.14 Seven representations were made on the Key Themes of the Deposit RLDP. These comprised three representations in support, two comments and two objections. The comments suggested that the Plan should include policies and objectives relating to traditional architecture, and that the key themes do not adequately address issues such as the cost of living and impacts on communities. Concerns were also raised regarding a perceived conflict between the key themes and the proposed site allocations, together with an apparent lack of monitoring arrangements.

Vision

5.15 A total of twelve representations were made on the Vision of the Deposit RLDP (2 support, 5 comments, 5 objections). The issues raised included whether the reference to the marina remains relevant, concerns regarding the achievability and aspirational nature of the Vision, questions about its reference to the South Wales Metro, and whether specific settlements should be referenced.

Objectives

5.16 Thirteen representations were made on the strategic objectives of the Deposit RLDP (4 support, 4 comments, 5 objections). The issues raised included the omission of reference to the Port of Barry, the need for references to traditional architecture, requirements for targets and the remit in respect of health and transport. Individual responses to each representation are included below.

CHAPTER 5 - STRATEGIC GROWTH AREA, KEY DIAGRAM AND 6 STRATEGY COMPONENTS

Strategic Growth Area

5.17 A total of 5 duly made representations were submitted in respect of Sustainable Growth Area defined as part Sustainable Growth Strategy (1 objection, 3 comments and 1 support). The issues raised were that parts of the Vale were already over developed and placing a strain on infrastructure. In addition, sustainable growth requires supporting infrastructure e.g. bus hubs. Existing transport links are shrinking and transport connectivity in Rhoose, Llantwit Major and St Athan cannot be considered to be good with infrequent rail and bus services.

Key Diagram

5.18 One objection was made to the key diagram, questioning the accuracy of bus route data.

Sustainable Growth Strategy

5.19 Representations were also made in respect of the 6 components of the RLDP Strategy

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

5.20 A total of 2 duly made representations were submitted in respect of Element 1 of the RLDP Sustainable Growth Strategy. The objection considered the need for an SDP to be in place before the RLDP is adopted.

Aligning locations for new housing, employment, services and facilities to reduce the need to travel.

5.21 A total of 4 duly made representations were submitted in respect of Element 2 of the RLDP Sustainable Growth Strategy, (1 objection, 1 comment and 2 support). Objectors argued that the plan allocates housing in areas poorly served by bus services (e.g Rhoose) and therefore housing allocations do not adhere to this objective.

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.

5.22 A total of 5 duly made representations were submitted in respect of Element 3 of the RLDP Sustainable Growth Strategy, (2 objection, 3 support). Whilst there is support for this element of the strategy, concerns have been raised on the need for a cohesive transport plan with reference to Rhoose and St Athan.

Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement.

5.23 A total of 4 duly made representations were submitted in respect of Element 4 of the RLDP Sustainable Growth Strategy, (1 objection, 1 comment and 2 support). The strategy component has received support, but concerns have been raised about the definition of small scale and capacity of infrastructure to accommodate new development.

Supporting the role of Cardiff Airport as a strategic gateway for international connectivity.

5.24 A total of 6 duly made representations were submitted in respect of Element 4 of the RLDP Sustainable Growth Strategy, (1 Objection, 2 comments and 3 support). The issues raised include an objection to the inclusion of Model Farm and support for promoting Cardiff Airport and St Athan as enterprise zones these areas are underutilised. However, comments have been made that major improvements in highways and transport links are required.

Allowing for regeneration opportunities on previously developed and underutilised land, including at Aberthaw and Barry Docks.

5.25 A total of 6 duly made representations were submitted in respect of Element 6 of the RLDP Sustainable Growth Strategy, which included support for this objective. Comments were made in respect of rewording the section on Barry Docks to reflects updates to the Masterplanning process.

CHAPTER 6 - POLICY FRAMEWORK

5.26 A wide range of representations were made in respect of the policies contained within the Deposit RLDP. These representations ranged from objections to specific aspects of policy wording, requests for policy amendments and/or clarification regarding interpretation and implementation, and proposals for the deletion of existing policies or the inclusion of additional policies, as well as minor typographical and factual amendments. Representations were also made on policies in relation to specific site allocations within the Plan.

5.27 The Annexes provide summaries of all issues raised through the RLDP consultation, together with the Council's consideration of the representations received. Where the Council proposes changes to the Plan, these are detailed within the Schedule of Focussed and Minor Changes.

5.28 The following section provides a summary of the main issues raised in relation to the policy framework, presented in Plan order.

STATEGIC AND SPATIAL CHOICES

SP1 - SUSTAINABLE GROWTH STRATEGY

5.29 Welsh Government have confirmed their support for the Sustainable Growth Strategy, confirming that it conforms with national planning policy and Future Wales and other respondents also expressed support for the principles of it.

5.30 However, objections were raised on a number of grounds including concerns about over-development and a lack of infrastructure and/or insufficient infrastructure capacity (highways, education, utilities, health) within specific settlements (including Rhoose, St Athan, Llantwit Major and Barry). Objections were also raised on the grounds of impact on biodiversity, loss of greenfield sites, flooding and the need to protect the Glamorgan Heritage Coast.

5.31 Several representors commented that the strategy did not conform with Future Wales, with one representor believing that the National Growth Area did not apply to the western Vale and others considering that the level of growth proposed was not sufficiently ambitious for a Future Wales National Growth Area.

5.32 Other concerns included the strategic approach to minor rural settlements, which resulted in limited allocations, and the view that an insufficient range of sites had been chosen in terms of size, with few opportunities for SMEs. Sully's role as a potential option to meet Barry's housing requirements was referenced.

SP2 – SETTLEMENT HIERARCHY

5.33 Objections centred on the distribution of growth, the justification for settlement classifications, and the flexibility of the policy framework.

5.34 Representations were made in respect of the levels of growth being overly concentrated in certain locations, particularly Barry and Rhoose, placing pressure on infrastructure and services while overlooking opportunities in other higher-order or primary settlements. Similarly, representors raised concerns that the lack of allocations or limited growth identified in primary settlements within the Strategic Growth Area undermined the RLDP spatial strategy.

5.35 Objections were raised in respect of the designation of Wick as a Primary Settlement, which objectors considered was contrary to the evidence base. Other objections were raised in respect of Minor Rural Settlements and the absence of housing allocations in this tier of the settlement hierarchy with objectors highlighting that this does not adequately reflect the role these communities can play in accommodating proportionate growth and responding to affordable housing need.

SP3 – DEVELOPMENT IN THE COUNTRYSIDE

5.36 The key issues raised are consultation with the Police, the approach to development in hamlets and smaller rural settlements and the allocation of land for retail in the countryside, the need to include policies to safeguard land and encourage food production and the need for further guidance on rural enterprise dwellings for small scale horticulture.

SSC1 – DEVELOPMENT WITHIN SETTLEMENT BOUNDARIES

5.37 The key issues raised were an objection to a specific change to the settlement boundary in Colwinston, concerns about the amendment to settlement boundaries where areas where previously included within a green wedge, and a suggested addition in respect of the protection of open space.

PLACEMAKING AND GOOD DESIGN

SP4 – PLACEMAKING

5.38 The principles of the policy were supported by some representors. Comments and objections relating to Policy SP4 centred on the importance of incorporating Secured by Design principles into new developments, references to food production, concerns

regarding higher-density development, and the extent to which community engagement should be required. Other comments related to the need for placemaking plans within specific communities and the necessity of placemaking statements, including their relationship with Design and Access Statements. Finally, concerns were raised regarding the potential impact of development on health and wellbeing.

PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES

5.39 Some representations from the development industry on Policy PGD1 consider that elements of the policy replicate other policies of the plan and in particularly SP4, creating confusion and extra work. Other issues raised include the importance of Secured by Design principles was referenced, parking provision and design codes. It was also suggested that the policy referenced the need for outdoor community interaction.

PGD2 - RESIDENTIAL DEVELOPMENT DENSITIES

5.40 Some representations were seeking lower density development and another representor supported the policy wording which allowed flexibility where there are site constraints. Two promoters of allocated sites confirmed that the prescribed densities set out in the policy were deliverable on their sites.

SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES

5.41 Representations raising objections to Policy SP5 highlighted concerns of additional policy requirements for undertaking HIA and burden placed on developers,, the absence of guidance, potential delays and potential impact on viability. Conversely, those supporting the policy highlighted the importance of detailed guidance, and clearer processes to ensure effective implementation.

<u>ACTIVE AND SOCIAL PLACES</u>

SP6 – HOUSING REQUIREMENT

5.42 The housing requirement set out in Policy SP6 has been subject to a wide range of representations, principally concerning its overall scale, evidential basis, spatial distribution, regional alignment and deliverability. Comments have also been made in respect of the conformity with Future Wales, and the implications of updated population and household projections and estimates of housing need, as well as the flexibility allowance.

HG1 – HOUSING ALLOCATIONS

5.43 The majority of representations submitted on the Deposit RLDP related to site-specific housing allocations as identified within Policies HG1, HG2, Key Site Policies KS1-5 and Policy HG4 Rural Affordable Housing Led Sites.

General Policy Comments

5.44 A number of representations were submitted that apply generally to housing allocations identified within the Policy. The issues raised include infrastructure capacity and service constraints, the scale and distribution of growth and the site selection process.

Key Sites

5.45 The key sites received the largest number of representations.

	Respondents	Representations	Support	Object	Comment
KS1 Land at North West Barry	186	312	1	249	62
KS2 Land North of Dinas Powys	503	528	10	514	4
KS3 Land at Readers Way, Rhoose	53	74	1	68	5
KS4 Land at Church Farm, St Athan	66	79	2	61	16
KS5 Land to the west of St Athan	30	39	1	22	16

5.46 The following petitions were also submitted on key sites:

- HG1 KS1 – Land at North West Barry – online petition – 272 signatures
- HG1 KS1 – Land at North West Barry – paper petition – 217 signatures
- HG1 KS2 – Land North of Dinas Powys – online petition – 1,376 signatures
- HG1 KS2 – Land North of Dinas Powys – paper petition – 377 signatures

Housing Allocations

5.47 There were also a large number of representations raised on the other housing allocations, most notably in respect of sites HG1.6 and HG1.8.

	Respondents	Representations	Support	Object	Comment
HG1.1 Pencoedtre Lane, Barry	6	6	0	3	3
HG1.2 The Mole, Barry	4	4	0	1	3
HG1.3 Hayes Lane, Barry	6	6	0	3	3
HG1.4 Neptune Road, Barry	3	3	0	1	2

HG1.5 Northern Access Road (Site C), Llantwit Major	16	16	2	6	8
HG1.6 St Athan Road, Cowbridge	40	43	0	39	4
HG1.7 Burley Place, St Athan	7	7	0	4	3
HG1.8 Clive Road, St Athan	46	46	2	41	3
HG1.9 North of the railway line, Rhoose	6	6	0	3	3

Major Land Bank Sites and Housing Led Redevelopment Opportunity

5.48 A smaller number of representations were received on the major land bank sites, as expected as the principle of development has already been established on these sites.

	Respondents	Representations	Support	Object	Comment
HG2 (1) Land at Upper Cosmeston Farm, Penarth	7	7	0	5	2
HG2 (2) Northern Access Road (Site A), Llantwit Major	8	8	2	2	4
HG2 (3) Northern Access Road (Site B), Llantwit Major	8	8	2	3	3
HG2 (4) Land south of Llandough Hill, Llandough	2	2	0	2	0
HG2(5) Land west of Swanbridge Road (Phase 2), Sully	0	0	0	0	0
HG3(1) Former Eagleswell Primary School, Llantwit Major	6	7	2	1	4

5.49 Whilst there were site specific issues raised on each housing allocation, there were a number of common concerns identified by residents across all sites, as summarised below:

- The impact of new development on the highways network and poor public transport options.
- An in-principle objection to the development of greenfield sites and that brownfield sites should be used instead.
- Concern that supporting infrastructure would not be provided or would be provided too late. Reference was made to community infrastructure (e.g. schools, health facilities) and other infrastructure (water, sewerage) being at or over capacity and unable to cope with existing pressures, and that additional housing would place further pressure on such infrastructure.
- Negative impacts of new development on the natural environment including biodiversity, landscape, air quality and the loss of agricultural land.
- Impact of development on built heritage.
- Flood risk both on site and within wider areas.
- No need for additional housing in an area, specifically affordable housing.
- General concerns about impact on amenity, the loss of views, impact on house prices and anti-social behaviour.

SP7 - AFFORDABLE HOUSING PROVISION

5.50 The key issues raised through the representations made in respect of Policy SP7 that Policy SP7 is too rigid in requiring a fixed mix of affordable housing based without sufficient regard to site-specific viability, and factors such as abnormal costs, technical constraints, and wider planning obligations can affect deliverability. Representations also argued that SP7 conflicts with Policy SP8, the latter allowing for negotiation and viability assessment which is absent in SP7.

5.51 In addition, representations sought clarification to the wording of SP7 regarding the role of the Local Housing Market Assessment in guiding negotiations on tenure mix, and suggested rewording of the Policy replacing “minimum” with “target” and clarifying as to how site-specific circumstances, updated evidence, and viability would be considered. Further change sought in the supporting text to broadening references to the forms of community led housing that the Council would support.

5.52 Notwithstanding these representations, comments submitted generally supported the overall aim of increasing affordable housing provision.

SP8 – AFFORDABLE HOUSING REQUIREMENT

5.53 Representations submitted in response to Policy SP8 raise a number of objections relating to viability, flexibility, and internal consistency with other policies (namely SP7). Representations object to the setting of off affordable housing percentages, and at the same time requiring for affordable housing to be negotiated on a site-by-site basis, arguing that this creates uncertainty. Conversely, representors were made in support of

this flexibility indicating that this is essential in recognising that affordable housing requirements may need to be adjusted where viability is constrained.

5.54 Representation also questioned why affordable housing led sites were required to delivery 50% affordable housing whilst in other rural areas 40% was required, this being viewed as being potentially unfair treatment of smaller rural sites where there are tighter viability margins.

HG4 – RURAL AFFORDABLE HOUSING LED SITES

5.55 The key issues raised through the representations made in respect of Policy HG4 are that the plan relies too heavily on large strategic sites and existing allocations to deliver affordable housing, whilst Policy HG4 allocates only a small number of new affordable led sites which representors considered would make a very limited contribution toward meeting the overall affordable housing target of the RLDP. Representations also objected to the absence of allocations in rural settlements identified in the RLDP settlement hierarchy (e.g. St Nicholas, Ystradowen, Ogmore-by-Sea) arguing for increasing the number of sites in rural areas. Conversely, in those settlements where an affordable housing led sites have been identified, objections were made to these sites on the grounds that these settlements have experienced recent growth through allocations in the LDP.

5.56 Several representations considered that the affordable housing requirement of 50% was and thresholds of 25 for minor rural settlements and 50 for primary settlements was overly prescriptive, arguing that limiting size capacities were arbitrary and potentially harmful to viability and would limit the ability to deliver schemes or respond to local needs. Representors also highlighted the potential problem of achieving a 50/50 market to affordable housing split on sites of 25 units. Accordingly, representations seek greater flexibility in both dwelling numbers and tenure mix.

Rural Affordable Housing Led Site Allocations

5.57 The following table details the representations made on the four sites allocated under Policy HG4.

	Respondents	Representations	Support	Object	Comment
HG4.1 Land to the East of Colwinston	60	68	0	66	2
HG4.2 Land west of Maendy Road, Aberthin	76	82	2	78	2
HG4.3 Land at Heol Fain, Wick	34	46	1	38	7
HG4.4 Land north of West Winds	20	26	3	21	2

Business Park, Fferm Goch					

5.58 The following petition was also received:

- HG4.2 – Land west of Maendy Road, Aberthin – online petition – 103 signatures

5.59 The issues raised on the Rural Affordable Housing Led Sites mirrored the concerns raised on housing allocations in other areas in respect of concerns about infrastructure capacity. However, a key theme that was raised across all sites was the principle of additional development in the settlement in question and their suitability.

HG5 – AFFORDABLE HOUSING EXCEPTIONS SITES

5.60 The principal objection relates to the provision of affordable housing on exception sites outside settlement boundaries, with concerns raised that permitting such development could result in the unnecessary loss of open countryside, harm to ecological interests and urban sprawl. Representors argued that the delivery of affordable housing should instead be maximised on allocated sites within existing urban areas.

5.61 Conversely, a number of representations supported the principle and overall approach of permitting 100% affordable housing exception sites, with Welsh Government endorsing the policy's alignment with national planning policy and guidance. Other representations sought greater flexibility for the provision of affordable housing in smaller rural settlements where proposals are supported by local communities and help to address identified local housing needs. Suggestions included extending settlement boundaries to encompass smaller hamlets currently excluded from the RLDP settlement hierarchy. Representations also sought recognition of additional delivery mechanisms for affordable housing, including community-led housing initiatives.

HG6 – PROVISION OF SPECIALIST ACCOMMODATION

5.62 The representations made on this policy requested that bungalows be provided as part of specialist accommodation and South Wales Police commented that all older person's housing should be built to Secured by Design Standards.

HG7 - HOUSES IN MULTIPLE OCCUPATION (HMOs)

5.63 One representation was submitted in relation to Policy HG7 from South Wales Police which highlighted the importance of early consultation with South Wales Police at the pre-planning stage, offering to assist the Council in the production of Supplementary Planning Guidance for HMOs.

HG8 - CONVERSION AND RENOVATION OF RURAL BUILDINGS

5.64 No representations were received on this policy

HG9 - REPLACEMENT DWELLINGS, RESIDENTIAL EXTENSIONS AND ANNEXES IN THE COUNTRYSIDE

5.65 No representations were received on this policy

SP9 – GYPSY AND TRAVELLER SITE PROVISION AND GT1 GYPSY TRAVELLER ACCOMMODATION

5.66 Most representations received in respect of gypsy and travellers related to Policy SP9 - Gypsy and Traveller Site Provision, which identifies a site for 7 pitches on land at Llangan.

5.67 The key issues raised related to legal and procedural issues, the view that the location is unsuitable and the scale of development is inappropriate. Concerns were also raised about access and highways access, landscape and historic environment, infrastructure constraints, flooding, policy conflicts and community impacts.

5.68 As many representors also raised site specific issues under Policy GT1 Gypsy and Traveller Accommodation, both policies have been addressed under a single composite response.

TRANSPORT POLICIES (SP10, TR1)

5.69 Whilst there was some support for Policy SP10 promoting sustainable transport, one representor considered that prioritising sustainable transport over improving access for private cars could deter investment. Other issues raised included the need for bus and rail improvements to be delivered before development commences, the unreliability and infrequency of public transport services, and concerns regarding airport parking. It was also suggested that the policy wording requires greater clarity. Furthermore, it was noted that the terminology relating to active travel has evolved, and the Plan should now refer to 'wheeling' alongside walking and cycling.

5.70 Several representations raised the delay by Transport for Wales in delivery enhanced rail services along the Vale of Glamorgan line. A number of representations also raised concerns regarding the proposed highway improvements at Weycock Cross, in respect of the accuracy of transport modelling undertaken, the funding and time of improvements and impact on existing traffic flows and highway safety. Elsewhere support was expressed towards the proposed active travel routes identified within the plan.

RETAIL POLICIES (SP11, SP12, RCS1, RCS2, RCS3)

5.71 Representations submitted in respect of the retail policy framework relate to the position of specific settlements within the retail hierarchy, the retail floorspace provision and how the plan would provide for the identified need including allocations proposed within the plan.

5.72 The key concerns raised in respect of the proposed retail allocations questioned to the need for additional retail provision within the area, the impact on existing local business and retail centres, the suitability of alternative uses for the proposed retail sites, the availability of alternative locations for retail development, the absence of safeguards to prevent the retail units being converted into housing and the impacts on the local highway network, including the proposed access arrangements.

5.73 Additionally, representations were made seeking policy amendments, whilst elsewhere support given to the Council's Policy approach for the managing of hot food takeaway proposals within retail centres.

SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

5.74 The issues raised include the necessity of the policy, references to community growing areas, timescales for delivery and the specific requirements for Welsh language contributions and the mitigation of recreational pressure in the Severn Estuary. There are also mixed views on whether viability should be a consideration when determining planning application, with developers supporting the reference to viability, and others raising concerns that it invites developers to challenge requirements.

CI1 – OPEN SPACE PROVISION

5.75 Whilst there was support for the policy objective of ensuring that new development makes provision for open space, some concerns were raised. Key issues included clarification on the increased levels of open space per 1000 population compared to the requirements of the adopted RLDP, the necessity of providing an open space strategy for sites above a certain threshold, and the need for greater flexibility and proportionality. Conversely, one representation seeks less flexibility and the provision for open space to be largely provided on site unless there is clear justification that this is not possible.

CI2 – PROTECTION OF EXISTING OPEN SPACE

5.76 Comments were received that the evidence base in respect of sport and recreation could be strengthened. It was also suggested that the policy be strengthened to reference food growing and that the policy did not go far enough and that protection should be strengthened.

COMMUNITY FACILITIES (CI3, CI4, CI5)

5.77 A small number of representations were received on specific new community facilities allocations (CI3.1-CI3.6) raising site specific issues including timescales for delivery and highways safety. Consultation was also requested on new community facility proposals.

PRODUCTIVE AND ENTERPRISING PLACES

EMPLOYMENT GROWTH (SP14, EMP1, EMP2, EMP3, EMP4, EMP5 AND EMP6)

5.78 Representations were received in respect of the RLDP Policy framework SP14 Employment Growth and associated employment site allocations and alignment of employment land associated forecast jobs growth for which support was offered by the Welsh Government. Elsewhere support was expressed for the identification of Athan and Cardiff Airport and Enterprise Areas and Aberthaw and Operational Port at Barry Docks as areas of employment related regeneration, whilst indicating that these areas need to be supported through improvements to the highway and transport network. Similarly, support was given to the identification of a policy specific to safeguarding the operational requirement at MOD St Athan.

5.79 Specific concerns have been raised about the allocation of Model Farm. The key issues raised are need for employment land, traffic, loss of agricultural land, viability and deliverability, sustainability, amenity, biodiversity, green wedge, flooding, the candidate site assessment process and sewerage capacity.

5.80 In respect of the policy framework, several representations were made suggesting amendments to the wording of policies and supporting text and the inclusion of land for employment.

SP15 - SUSTAINABLE TOURISM

5.81 Representations comments on the need to improve water quality in the area, whilst South Wales Police highlighted the importance in engaging with SWP in the planning of tourism events.

SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

5.82 The key issues raised include how food production is considered in the policy, whether a site-specific modal shift target should be set, the applicability of the policy to all development proposals and the robustness of the evidence base behind the policy.

CC1 – RESIDENTIAL OPERATIONAL NET ZERO CARBON DEVELOPMENT

5.83 This is a new policy which requires new dwellings to meet operational net zero standards. These standards will exceed current and proposed building regulations in response to the Vale of Glamorgan's declared climate emergency. The policy has received a mixed response for individual respondents, with some support but also some comments on its enforceability and the value the policy has when considered against other factors.

5.84 Comments have also been made by the housebuilding industry. Whilst some developers were supportive of the principle, developers generally objected to the detailed

requirements of the policy. As many developers raised similar concerns, this has been addressed as a composite response. The key concerns of the development industry were around the necessity of the policy, costs and viability, and how the policy would be implemented in practice.

CC2 – PRESUMPTION AGAINST DEMOLITION

5.85 Whilst there has been some support for the principle of the policy, concerns have been raised that the policy does not go far enough and that pre-1950 buildings should be protected from demolition. Conversely, some developers have concerns that the policy is overly onerous and would have a negative impact on timescales and windfall delivery.

CC3 – RENEWABLE ENERGY LOCAL SEARCH AREAS

5.86 The key issues raised were about the policy wording and consultations on applications. Concerns were also raised about the suitability of specific search areas to accommodate solar farms due to area specific constraints.

CC4 – RENEWABLE, LOW AND ZERO CARBON ENERGY GENERATION

5.87 The key issues raised where updated terminology on Strategic Infrastructure Projects, consultations with statutory consultees including the Police and MOD, and the landscape impact of renewable energy schemes.

CC5 – PROMOTING HEAT NETWORKS

5.88 The representations sought clarification on progress on a District Heat Network in Barry and consultation on heat pump placements.

CC6 – COASTAL DEFENCES AND SHORELINE MANAGEMENT

5.89 One representation of support was made in respect of Policy CC6 – Coastal Defences and Shoreline Management.

WASTE MANAGEMENT POLICY FRAMEWORK (SP17 AND WA1)

5.90 Representations received in respect of Waste policies supported the policy to support non-operational mineral sites for waste management proposals such as demolition waste, whilst seeking the identification of sites within the plan for such provision. Representations also requested amendments to the wording of policies.

MINERALS POLICY FRAMEWORK (SP18, MIN1, MIN2 MIN3 AND MIN4)

5.91 Representation was submitted in respect of the plan minerals policies related to concern raised by the minerals industry in respect of the evidence base supporting the minerals land bank and provision, interpretation of national planning policy in respect of aggregate recycling and lack of new allocations within the plan. Representations were also made in respect of the wording of policies relating to mineral safeguarding and site-specific references to existing quarries identified within the policies.

DISTINCTIVE AND NATURAL PLACES

SP19 – GREEN INFRASTRUCTURE

5.92 The key issues raised involve strengthening Policy SP19 by aligning it with national guidance and the Green Infrastructure Strategy, resolving potential conflicts between multi-functional spaces and net biodiversity benefit, integrating community food growing and flood assessments, and ensuring green infrastructure requirements remain viable for development.

SP20 – BIODIVERSITY AND ECOSYSTEM RESILIENCE

5.93 Detailed representations were made by statutory consultees on the wording of the policy and the need for further clarity. It is also considered that an additional strategic policy on the natural environment is required. In light of representations received amendments are proposed to wording and supporting text of Policy SP20, in addition to a new policy on the natural environment. Further comments were raised by other stakeholders who considered that the policy was too weak and should provide more detail on building dependent species and growing spaces. There was also support for the flexibility in the policy and representors considered that the approach accorded with national planning policy.

DNP1 – SPECIAL LANDSCAPE AREAS

5.94 Site specific comments were received on the inclusion or exclusion of sites from the boundaries.

DNP2 – GREEN WEDGES

5.95 Representation in respect of Green Wedge designations considered that the protection offered to such designations was weak and opened to changes that were unjustified by evidence. Whilst elsewhere general support was expressed to the identification of new green wedge designations, including those that suggest that green wedges provide opportunities for increase food production. Conversely objections were raised to the

identification of new green wedge designations on the grounds that these would further restrict opportunities for development.

DNP3 – GLAMORGAN HERITAGE COAST

5.96 The main issues raised were that the plan does not provide sufficient protection for the setting of the Glamorgan Heritage Coast and there were concerns over the cumulative impacts of development on the area particularly Gileston and St Athan and the lack of direct benefit to local communities. It was considered that the RLDP creates policy ambiguity that could be seen to encourage large scale energy infrastructure on greenfield land in sensitive locations. It was also considered that the inclusion of the proposed railway station at St Athan conflicts with the Glamorgan Heritage Coast designation. It was suggested that the policy should allow for small-scale housing developments in the Glamorgan Heritage Coast.

DNP4 - HISTORIC ENVIRONMENT

5.97 Two representations were submitted in respect of Policy DNP4 Historic Environment - a representation raising general concerns over proposed retail development between Llantwit Major and Llanmaes and a universal consultation response on heritage matters.

DNP5 - ENVIRONMENTAL PROTECTION

5.98 There was general support for the policy and the recognition of the need to safeguard natural resources from the impacts of development. Representations highlighted the need for flood prevention measures at Llanmaes, requesting that the Council seek the reinstatement of flood alleviation scheme previously identified by the Welsh Government, and the scheme be identified in the RLDP. There was also a need to ensure that upgrades are made to water infrastructure (sewage) prior to development to avoid pollution of ground waters. It was also suggested that Best and Most Versatile (BMV) Land be removed from the policy, arguing that the loss of BMV land would have limited impact on the environment or residential amenity.

DNP6 - QUIET AREAS

5.99 The primary issue raised being why the areas identified in the policy were limited to Penarth and did not extend to other areas within the Vale of Glamorgan e.g. Barry.

DNP7 – DARK SKIES

5.100 There was support for the policy. South Wales Police requested consultation on applications to allow them to provide advice on lighting.

DNP8 – SEVERN ESTUARY RECREATIONAL PRESSURE

5.101 Representations in respect of Policy DNP8 on Severn Estuary Recreational Pressure raised concerns around deliverability, evidence and costs. This matter is also addressed in representations on the Habitats Regulations Assessments.

CONSULTATION PROCESS

5.102 In addition to representations made on the content of Deposit RLDP itself, some representations were also made in respect of the consultation process itself. The key issues raised were that the RLDP consultation process was overly complex, heavily digital, difficult to navigate, insufficiently publicised, and provided too little time for meaningful public participation. Many respondents believe these issues reduced accessibility, excluded sections of the community, and undermined confidence that public views genuinely influenced the plan.

6. ANNEXES

6.1 The following annexes set out the issues raised by representors together with the Council's response to the issues and any actions necessary to address the points raised. The Annexes have been split as follows:

- Annex 1 – Statutory Consultees (WG and NRW)
- Annex 2 – Chapters 1-5 - Policy Context, Characteristics, Vision, Objectives and Strategy and Consultation Process
- Annex 3 – Strategic and Spatial Choices and Placemaking and Good Design
- Annex 4 – Active and Social Places – Housing and Gypsy and Traveller Policies
- Annex 5 – Housing allocations
- Annex 6 – Active and Social Places – Transport, Retail and Community Infrastructure
- Annex 7 – Productive and Enterprising Places – Employment, Climate Change and Waste and Minerals
- Annex 8 – Distinctive and Natural Places – GI, Biodiversity and protecting the natural and built environment
- Annex 9 – Integrated Sustainability Appraisal and Habitats Regulations Assessment
- Annex 10 – New site submissions
- Annex 11 – Candidate sites representations
- Annex 12 – Background Papers

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036

CONSULTATION REPORT ANNEXES

November 2026



RLDP CDLN

VALE of GLAMORGAN BRO MORGANNWG

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

INDEX

- Annex 1 – Statutory Consultees (WG and NRW)
- Annex 2 – Chapters 1-5 - Policy Context, Characteristics, Vision, Objectives and Strategy and Consultation Process
- Annex 3 – Strategic and Spatial Choices and Placemaking and Good Design
- Annex 4 – Active and Social Places – Housing and Gypsy and Traveller Policies
- Annex 5 – Housing allocations
- Annex 6 – Active and Social Places – Transport, Retail and Community Infrastructure
- Annex 7 – Productive and Enterprising Places – Employment, Climate Change and Waste and Minerals
- Annex 8 – Distinctive and Natural Places – GI, Biodiversity and protecting the natural and built environment
- Annex 9 – Integrated Sustainability Appraisal and Habitats Regulations Assessment
- Annex 10 – New site submissions
- Annex 11 – Candidate sites representations
- Annex 12 – Appendices, Background Papers, Draft Green Infrastructure Strategy and Draft Health Placemaking SPG

ANNEX 1 - STATUTORY CONSULTEE REPRESENTATIONS AND RESPONSES

This section sets out the representations received from two key statutory consultees, the Welsh Government (WG) and Natural Resources Wales (NRW), and provides the Council's response to the matters raised. Both organisations submitted extensive comments on the Plan, which have been considered in detail.

One of the key tests of soundness is 'Does the Plan Fit?', which considers whether the RLDP is consistent with national policy and the National Development Framework, regional policy and any relevant Strategic Development Plans, the plans of neighbouring local authorities, and the Well-being Plan for the area. WG's position on this matter is essential in demonstrating that the Plan complies with this soundness test. In its representation, WG confirms that the Deposit Plan is in general conformity with the National Development Framework: Future Wales.

As a statutory consultee on environmental matters, both in relation to the RLDP and the supporting Integrated Sustainability Appraisal (ISA) and Habitats Regulations Assessment (HRA), NRW's comments are also of significant importance.

In addition to the full representations and responses included within this Annex, comments relating to specific policies or allocations have also been referenced in the relevant statutory consultation sections of the subsequent Annexes.

It should be noted that consultation responses were also received from a number of other statutory consultees, including Cardiff and Vale University Health Board, South Wales Police, several Town and Community Councils, and utility providers such as Dwr Cymru Welsh Water and National Grid. Many of these comments, particularly those from utility providers and Town and Community Councils, related to specific sites and have therefore been considered as part of the responses to the relevant allocations. Policy-specific matters have been addressed within the statutory consultee section of each response where relevant.

WELSH GOVERNMENT (PLANNING DIVISION)

5112-5113 - National Policy and Legislation and Regional Context

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.

Council Response

The Council notes the Welsh Government's confirmation in respect of the RLDP conformity with national and regional policy frameworks.

The Council also acknowledges Welsh Government's support in respect of the joint working that has been undertaken between the Vale of Glamorgan and its neighbouring authorities in the preparation of the Vale of Glamorgan RLDP.

5114 - SP1 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.

Council Response

The confirmation that the spatial strategy is in conformity with Future Wales is noted.

5115 - SP2 Settlement Hierarchy

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.

Council Response

The Council notes the WG's comments, which confirm that the scale and distribution of growth are appropriate in the context of the settlement hierarchy. The comments regarding Culverhouse Cross and Wick are noted.

5117 - SP6 Housing Requirement

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 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.

Council response

The Council notes WG's confirmation that they do not object to the level of housing growth for the plan period, as well as the recognition of the work that has underpinned the housing requirement figure.

The comment that it will be essential to demonstrate the deliverability of the key sites is acknowledged. Key site allocations are already informed by an extensive evidence base, including supporting studies, masterplanning work and viability assessments, which have been subject to independent review, which provide the evidence to demonstrate that the sites are deliverable.

5118 - SP6 Housing Requirement – Table 2 Housing Supply

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.

Suggested Change

Include at Appendix 1 additional Table replicating Table 21 of the DPM.

Council response

Support for the approach taken in calculating the windfall allowance, the non-delivery allowance and the flexibility allowance is noted.

Appendix 1 of the Deposit RLDP sets out the list of sites within the housing land supply with forecast completions (Tables 19 and 20 of the DPM) and the Housing Development Trajectory graph (Diagram 16 of the DPM). The data informing the figures in the graph reflects rows E to K of Table 21 of the DPM (Calculating the Anticipated Annual Build Rate) and has been included under the graph. However, for completeness, it is proposed to amend this table to also include rows A to D and K to N.

Proposed Change

Update the Table in Appendix 1 of the RLDP to include additional rows to ensure that it fully mirrors Table 21 of the DPM.

5121 - SP14 Employment Growth

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.

Council response

The Council notes WG's confirmation that they do not object to the level of jobs growth for the plan period.

5124 - SP7 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.

Council response

The comments are noted.

5130 - SP8 Affordable Housing Requirements

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.

Council response

The comments are noted. In undertaking the high-level viability review, a stakeholder workshop was held with the purpose of engaging with the development industry to provide an insight into factors relevant to viability in the Vale of Glamorgan. The information provided was used to inform the high-level viability appraisal as set out in Background Paper 42 Viability Review, and the minutes of the stakeholder workshops are contained in Appendices 4 of the BP42.

Additionally, site specific viability appraisals have been undertaken for the 5 Key Housing allocations. These were undertaken in conjunction with the site promoters as detailed in Background Paper 42A Independent Financial Viability Assessment of Key Sites.

5125 - HG4 - 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 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?

Council response

The support for the principle of the policy approach is noted.

With regard to settlement boundaries around affordable housing led sites, the sites are shown on the proposals map as being within the defined settlement boundaries of the settlements within which they are located, and in this regard, it is not considered necessary to refer to this within the policy, consistent with the other housing site allocation policies of the plan.

The Council does not consider that it is necessary to place additional controls over the land to ensure that the sites are delivered with a minimum of 50% affordable housing. Policy HG4 is a housing allocations policy. Other housing allocations policies (e.g. HG1) do not specify within the policy itself that affordable housing would need to be secured through Section 106 as this is addressed in other policies of the plan, including Policy SP8.

In identifying the affordable housing led sites, the Council has worked closely with the site promoters of the affordable housing led sites, where viability appraisals have been undertaken demonstrating that 50% affordable housing is viable. Additionally, Policy HG4 is explicitly clear that the sites are allocated on the basis of them delivering the required minimum 50% affordable housing, which shall be secured by the Council via s106, as stated in paragraph 6.133.

The affordable housing led sites will form part of the overall housing requirement, alongside market led sites. This accords with PPW paragraph 4.2.33, which states that *"Planning authorities must make provision for affordable housing led housing sites in their development plans. Such sites will include at least 50% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities."*

5126 - HG5 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.

Council response

Support is noted.

5127 - 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).

Council response

The Council notes the confirmation that Welsh Government do not object to the over-provision of employment land in the plan.

With regards to the Cardiff Airport and St Athan Enterprise Zone, reference is made in the supporting text to SP14 to the inclusion of allocations SP14 1-3 with the Enterprise Zone. However, it is recognised that the full extent of the Enterprise Zone is not delineated on the proposals map. This should be amended

Proposed change

Include the extent of the Enterprise Zone on the Proposals Map

5128 - Delivery and Implementation (Appendix 2)

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.

Council response

The comments are noted. The RLDP is supported by an extensive evidence base including an Infrastructure Delivery Plan (BP44) and Housing Land Supply and Housing Trajectory Paper (BP9A), which set out the timescales for delivery and the infrastructure requirements. The Council welcomes the Welsh Government's acknowledgement of the work done to date.

In respect of impacts on the trunk road network, the Council has undertaken a Strategic Transport Assessment (BP14 and BP14A) which utilises the South East Wales Transport Model (SEWTM). M4 Junction 34 (Miskin) was identified as a strategic junction and was assessed to consider the forecast effects of strategic housing allocations on its operation using the SEWTM data. It was concluded that the impact would be negligible (0.4% increase in the AM peak and 0.5% in the PM peak). This is not surprising given the distance of the site from RLDP housing allocations. It is recognised that there is an employment site located in close proximity to the junction. The recent planning application was supported by a Transport Assessment.

The Council intends to progress work on Statements of Common Ground with key site promoters as part of the Examination process.

5132 - Gypsy and Travellers Site Provision

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.

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.

Council response

The comments are noted. The justification for the allocation is explained in BP11A Gypsy and Traveller Background Paper.

5171 - CC5 - Promoting Heat Networks

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?

Council response

Since the Renewable Energy Assessment report (BP15A) was completed, there has been a change in circumstances as Barry Biomass plant has been decommissioned and cannot therefore form part of a district heat network.

The Council is considering other options for clean heat at the individual, shared and district level as part of the Local Area Energy Plan (LAEP). A clean heat planning tool is currently being developed by Nesta, in partnership with the Council, which will map opportunity areas and identify potential projects. As part of this project, Nesta are engaging with key stakeholders across the energy, housing, public sector and community sectors to share knowledge, explore opportunities and challenges and ensure that planned investments, network constraints, housing priorities and community perspectives and reflected in how the tool is applied in the Vale.

In addition, the Welsh Government Energy Service have conducted a feasibility study on the potential for a low-carbon heat network around Barry Hospital which would include a cluster of public sector buildings including a primary school and two secondary schools.

Work is also being carried out at the regional level by Cardiff Capital Region Local Area Energy Plan team to consider more strategic opportunities.

5172 - Renewable Energy Assessment (REA)

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.

Council response

The Dear Chief Planning Officer (DCPO) letter of 1st March 2022 states that "*where BMV land is identified within a proposed solar PV array development, considerable weight should be given to protecting such land from development.*" Whilst the Renewable Energy Assessment (BP15) does not specifically reference this letter, it does reference current best practice, which is to avoid BMV land. It is not therefore considered necessary to specifically include reference to the letter in the background document.

The comments in respect of solar and wind opportunities are noted.

5173 - Renewable Energy Local Search Areas

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.

Council response

It is recognised that peatlands are considered to be an irreplaceable habitat. However, only the northern part of the North East of Ystradowen wind search area overlaps with the area identified as peatland, with a significant part of the area lying outside this constraint area.

With regards to the SINC designation, it is noted that there is again some overlap between the SINC and the search area, although there is a part of the search area that is neither affected by the SINC nor the peat designation.

Policy CC3 is clear that proposals for renewable energy generation must also comply with the criterion set out in Policy CC5 on Renewable, Low and Zero Carbon Energy Generation. Criterion 4 requires there to be no unacceptable impacts on nature conversation and also on soil conservation. Should a planning application be received for wind generation in this area, development should be directed towards to part of the site that is free from constraints.

The Welsh Government queries whether the search areas in CC3 should already be acceptable in terms of the criteria set out in Policy CC4. The criteria for defining the search areas is set out in BP15 Renewable Energy Assessment. As part of this a number of constraints were considered, including heritage and nature conservation, best and most versatile agricultural land, historic environment, transport infrastructure, topography, proximity to existing dwellings and aviation and radar constraints. Search areas have been drawn to exclude statutory designated sites, but non-statutory wildlife sites were not excluded at the assessment stage. This is in line with PPW paragraph 6.4.1b which states that proposals in statutory designated sites are, as a matter of principle, unacceptable and therefore must be excluded from site searches undertaken by developers.

The Renewable Energy Assessment is high level, and consequently detailed ecological surveys would be a requirement of a planning application. This may identify other habitats or species of nature conservation value that are additional constraints. It is therefore necessary to consider policy CC3 alongside the other policy requirements in Policy CC4.

5174 - Renewable, Low and Zero Carbon Energy Generation

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.

Council response

The comments are noted. The Plan will be amended to reflect the updated terminology.

Proposed change

Replace references to Developments of National Significance (DNS) with Strategic Infrastructure Projects (SIP) in paragraphs 6.344 and 6.346.

5175 - Minerals – Statement of Regional Collaboration

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.

Council response

The primary purpose of this document is to establish strategic collaboration across the sub-region, confirm agreement on LPA apportionments, and outline how regional mineral requirements are managed collectively.

The Position Statement (BP25A) explicitly sets out how regional aggregate provision and local shortfalls are being addressed across the Cardiff City Sub-Region.

As identified in RTS2 (and the Welsh Government policy clarification letter), the Vale of Glamorgan possesses 18.73 million tonnes (mt) of permitted crushed rock reserves against a 25-year apportionment requirement of 17.05mt. Existing permitted reserves therefore exceed the required provision, meaning no new mineral allocations are required in the RLDP.

As shown in Table 2.1 of BP25A, the Vale of Glamorgan, Caerphilly, Bridgend, Merthyr Tydfil, and Brecon Beacons NP have sufficient permitted reserves to meet/exceed their 25-year apportionments without needing any new site allocations. Cardiff Council accepted its apportionment shortfall (7.475mt) and confirmed that site extensions (such as Taffs Well Quarry) and operator proposals within its boundary are being progressed to meet its requirement. RCT's initial shortfall was subject to an appeal determination regarding Craig-yr-Hesg Quarry, which has since been approved to permit additional extraction, overcoming the shortfall.

Paragraph 3.10 of BP25A outlines that in the event an authority cannot make an allocation to address its shortfall, the SSRC process provides the mechanism to effectively transfer apportionment collaboratively to neighbouring LPAs within the same sub-region.

To conclude, the Position Statement confirms that sub-regional demand for crushed rock can be fully met across the Cardiff City Sub-Region. The Council will continue to engage through the South Wales Regional Aggregates Working Party (SWRAWP) to update sub-regional monitoring and formalise any future iterations of the RTS and SSRC as LDP examinations progress across the sub-region. Should an LPA demonstrate an inability to meet its apportionment through local allocations in the future, the SSRC Position Statement will be updated to formally transfer and absorb apportionment across the sub-region.

5176 - BMV Agricultural Land (BP23A)

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.

Council response

The Council notes WG's acknowledgement that the approach to the consideration of BMV has been carried out in a sensible and pragmatic manner.

5177 - SP19 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.

Council Response

Whilst the Council fully supports the requirement for planning applications to be accompanied by Green Infrastructure Statements, it is not considered necessary to make specific reference to this within Policy SP19, as this is already a requirement of paragraph 6.2.12 of Planning Policy Wales. Paragraph 3.11 of the Development Plans Manual explicitly states that "an LDP should not repeat national policy" and the inclusion of such a requirement within the policy would duplicate the provisions of Planning Policy Wales.

The point regarding the protection and enhancement of all Green Infrastructure assets, rather than only those deemed to be high quality, is acknowledged. The Council is therefore content to amend the wording by removing the reference to “high quality”.

Proposed Change

Amend the policy wording of SP19 as follows:

Development proposals will incorporate measures that protect and enhance ~~high quality~~ multi-functional green infrastructure provision.

5178 - Biodiversity and Ecosystem Resilience

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.

Council response

As detailed in the response to NRW, Policy SP20 has been substantially redrafted. With regards to criterion 1, the proposed change to the policy includes a definition of high ecological value in the supporting text. These are the sites and habitats that are referred to in paragraph 6.4.15 of PPW as follows:

“Proposals in statutory designated sites are, as a matter of principle, unacceptable and therefore must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded.”

Policy SP20 is clear that development in these high ecological value areas should be avoided. For other sites, as detailed in Criterion 3, the step-wise approach should be considered which would first avoid all adverse impacts. This approach adheres to Figure 13 of PPW on how to consider designated sites and uses the same terminology.

5179 - BP30 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 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?

Council response

The Council notes the concerns raised by Welsh Government (WG) regarding the limited reference to the Welsh language within the Deposit RLDP and the perceived absence of a clear policy framework, including reference to the Council's own Welsh Language Strategy and Cymraeg 2050: A million Welsh Speakers, the Welsh Government's long-term strategy to achieve one million Welsh speakers by the year 2050.

The Council recognises the importance of the Welsh language as part of the social and cultural fabric of Wales and considers that the Replacement Local Development Plan (RLDP) has been prepared in accordance with the relevant legislative and policy framework, including, Planning Policy Wales (Edition 12), Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017), The Well-being of Future Generations (Wales) Act 2015; and Cymraeg 2050: A Million Welsh Speakers, which require a proportionate, evidence-based approach to Welsh language considerations within the RLDP having regard to local linguistic circumstances, the scale and location of development, and the likely nature of impacts.

The Council's local policy context includes its Welsh Language Promotion Strategy 2022–2027 and the Welsh in Education Strategic Plan (WESP) 2022–2032, both of which provide the primary mechanisms for promoting and supporting the use of the Welsh language at a local level. These documents are referenced in the RLDP evidence base, specifically in the Welsh Language Background Paper (BP30 refers). However, it is noted that the references are not also referenced in the Deposit Plan itself. It is therefore proposed that additional references to these documents should be included in the policy context section (Chapter 2) of the Deposit RLDP.

The RLDP is supported by an Integrated Sustainability Appraisal (ISA) which integrates and fulfils the duties and requirements of Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and the Well-being of Future Generations (Wales) Act 2015 (WBFG).

As evidenced in Background Paper BP30 – Welsh Language, the Vale of Glamorgan is not identified as a linguistically sensitive area within national planning policy terms. According to the 2021 Census, Welsh language use within the county remains below the national average, although the Vale of Glamorgan was one of only four local authorities that saw an increase in the number of Welsh speakers between the 2011 and 2021 Censuses.

Therefore, while the Council notes the WG's concern regarding a WLIA for the Plan, the Council considers that a standalone WLIA is not required. While the ISA recommends that stipulations are added to the Deposit Plan including a specific policy on the Welsh language, the Council considers that in the context of the background evidence such an approach is not supported.

However, as detailed in the background paper, the Plan acknowledges its statutory duty to consider the Welsh language and has embedded relevant provisions within broader thematic policies to ensure compliance with national targets and guidance. These include commitments to sustainable placemaking, cultural identity, and community infrastructure, which collectively support opportunities for Welsh language use across the Vale of Glamorgan. This approach reflects WG guidance, which does not mandate a WLIA in all circumstances, but rather requires authorities to justify their approach based on a proportionate, evidenced based approach.

WG have made comments that there appears no attempt to measure the impact on the Welsh schools resulting from housing development. This is not the case, as the Education Background Paper (BP43) considers the impact of all new developments on school places for English Medium, Welsh Medium, denominational and additional learning needs at both primary and secondary level. Appendix F of BP43 indicates that the majority of Welsh Medium schools are forecast to have sufficient capacity to accommodate additional places from RLDP growth. For the one school where capacity issues have been identified, Section 106 funding will be secured to facilitate an expansion to the school if this is still considered necessary at planning application stage.

The importance of monitoring is recognised. As Policy SP13 specifically references Welsh language facilities, the monitoring framework could be used to establish any changes in the proportion of children attending Welsh medium education. It is therefore proposed that a new monitoring indicator be included as part of the monitoring framework for SP13.

Proposed changes

In the policy context section include references to Cymraeg 2050: A million Welsh-speakers, the Vale of Glamorgan Welsh Language Promotion Strategy and the Welsh in Education Strategic Plan (WESP) 2022–2032

Include a new monitoring indicator for Policy SP13 to monitor the proportion of children attending Welsh Medium schools.

NATURAL RESOURCES WALES

6641 - Local Policy Context

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.

Council response

The support for the Council's declaration of a nature emergency is welcomed, as is the support for the policy framework in respect of biodiversity, which seeks to mitigate against potential adverse effects.

The comment that there should be specific mention of designated conservation areas and their relationship is noted. The ISA states that "*it is recommended that the relevant Key Site policies are updated to include specific reference to the designated sites they are within proximity to, in order to help establish appropriate protection and / or enhancement measures.*"

Whilst the site-specific policies for the key sites and the infrastructure delivery plan do recognise specific biodiversity constraints, including highlighting where key sites are within the 12.6km core recreational catchment zone for the Severn Estuary SAC, it is accepted that much of the description is in relation to on site constraints rather than proximity to designated sites outside of the site boundary. The comments that NRW have made in respect of this have been responded to as part of the site-specific composite responses for each key site allocation, but in principle the Council agrees that reference should be made to designated sites where these have the potential to be a wider constraint to development. For key sites this should be included in both the key site policy text and Appendix 2, the Infrastructure Delivery Plan. For non-key sites, reference should also be made within Appendix 2. The Infrastructure Delivery Plan Background Paper should also be amended to reflect these changes.

Proposed changes

Reference the proximity of allocated sites to statutorily designated sites as a constraint to development within the Appendix 2 - Infrastructure Delivery Plan and, where relevant, the key site policies. The Infrastructure Delivery Plan Background Paper should also be amended accordingly. The exact wording for each site is referenced under the composite response for each site.

6642 - SP20 – Biodiversity and Ecosystem Resilience - 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.

Council response

The Council recognises NRWs remit in respect of statutory designated sites. The protection of statutory designated sites has been an integral part of the site assessment process and the formulation of the policies in the RLDP. As detailed in respect of the previous representation, the Council proposes a change to the Deposit Plan Appendix 2 Infrastructure Delivery Plan to include references to statutory designated sites, both in relation to housing and employment where relevant. Employment sites are not currently referenced in the Appendix 2, but there would be merit in included an extra section on employment sites, rather than updating the Employment Background Paper (BP12A).

Appendix 7 of the RLDP provides a list of Sites of Importance for Nature Conservation (SINCs), which are locally designated sites. It is however accepted that there is no separate Appendix setting out a list of international, national or local designated sites, although the extent of the international and national designations have been shown on the RLDP constraints map and the list is referred to in the evidence base, including the ISA scoping report. For completeness, it is proposed that Appendix 7 be expanded to also provide a full list of designations that are within the Vale of Glamorgan boundary as follows:

- International - Special Areas of Conservation (SACs), Ramsar and Special Protection Areas (SPAs).
- National – Sites of Special Scientific Interest (SSSIs)
- Local - Regionally Important Geological and Geomorphological Sites (RIGs), Local Nature Reserves.

The SAC designation for the Severn Estuary is the same extent as the SPA designation. The Ramsar designation covers the same area, but also includes Sully Island. In the Deposit version of the constraints map, only the SAC area is shown but this will be amended to also show the Ramsar and SPA boundaries as separate layers. The constraints map will also be amended to include Local Nature Reserves (LNRs).

There are no National Nature Reserves (NNR) or Marine Conservation Zones (MCZ) within the Vale of Glamorgan boundary. It is noted that the Kenfig SAC, which also encompasses the Merthyr Mawr Warren NNR within Bridgend County Borough is in close proximity to the Vale of Glamorgan boundary. However, there are no proposals for new development within this area where it would be necessary to make reference to the proximity to the SAC or NNR.

Please see the separate response to NRWs comments on SP20.

Proposed changes

Where sites are in proximity to a statutorily designated site, reference this in Appendix 2 and in the key site policy, where appropriate.

Include a full list of statutorily designated sites in Appendix 7

Include the Severn Estuary Ramsar and SPA on the constraints map

7033 – SP4 Placemaking

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.

Council response

The Council supports the proposed change to Policy SP4.

Proposed change

Amend criterion 9 of SP4 to read:
Protecting or enhancing the historic environment and its setting, **and the natural environment**

7034 - Areas of High Ecological Value - SP20

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.

Council response
As detailed in the response to representation 6643, Policy SP20 and its supporting text is proposed to be amended. The amended supported text includes a definition of what is meant by high ecological value. NRW have been consulted on the proposed amendments to the Policy and have confirmed that they are satisfied with the definition.

7032 - 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.

Council response

As discussed in relation to representation 6642, where sites are in proximity to a statutorily designated site, this will be referenced in Appendix 2 and in the key site policy, where appropriate.

Strategic Policies

7031 - 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.

Council response

The Council is happy to include the proposed wording changes to policy SP19 and its supporting text.

As the plan should be read as a whole, it is not considered necessary to also repeated under the supporting text for Policy SP4 Placemaking.

Proposed changes

Amend criterion 2 of SP19:

2 Protect and enhance connectivity between existing green infrastructure assets **and be planned wherever possible to positively support areas of high ecological value.**

Add an additional criterion to Policy SP19:

X Have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessments (and the assets listed therein) and the Green Infrastructure Action Plan

Add an additional sentence into paragraph 6.397:

However, multi-functional uses of space must be considered carefully so that they are not detrimental to the natural environment or the policy requirement to achieve net benefit for biodiversity

6643 - 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).

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.

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 sites 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.

Council response

A definition of areas of high ecological value is proposed to be included in the supporting text for SP20.

In addition, it is proposed that Policy SP20 be amended to improve clarity and avoid repetition. As it is proposed to be clarified through the inclusion of the definition that 'areas of high ecological value' includes statutorily protected sites, it is not considered necessary to include separate criterion on the protection of internationally/nationally protected sites, as this is covered by national policy, which the RLDP should not repeat.

NRW have suggested that there is a need for an overarching policy on the wider protection of the natural environment which would identify 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. They have indicated that this 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.

In response to this, the Council propose to include a new strategic policy on the Natural Environment to address the points raised by the NRW. This policy will make direct reference to the Sustainable Management of Natural Resources and will also reference water resources.

A Masterplan has been prepared for each of the key sites to demonstrate the key placemaking and design principles that would apply to each site. Each high-level plan is referenced as 'indicative,' rather than being a detailed site layout. However, it does set out key parameters including which parts of the site are likely to accommodate built development and which are open space and green infrastructure corridors, which will also include areas required to achieve net biodiversity benefit.

The Masterplans have been informed by Preliminary Ecological Appraisals. The RLDP recognises that there will be a need for more detailed survey work, including in respect of protected species, at planning application stage. Should this additional survey work identify constraints, then it will be necessary to respond to this within the detailed layout. As the layout is described as 'indicative,' it is considered that there is sufficient flexibility to respond to this.

The Council have consulted with NRW on the proposed amendments to Policy SP20 and the new strategic policy. They have advised the following:

Overall having reviewed the amendments as proposed we are satisfied these address the relevant policy concerns as raised in our response letter. We confirm:

I. We have reviewed the revised wording for Policy SP20 (Biodiversity and Ecosystem Resilience) and new Strategic Policy for the Natural Environment. We welcome the changes made and the inclusion of a separate Natural Environment policy. This policy shows 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. The policy incorporates a wider Sustainable Management of Natural Resources approach through its

consideration of biodiversity, landscapes, soils, air quality, water resources and ecological connectivity.

II. *We also welcome that a definition of the term areas of high ecological value is supplied. We are satisfied with the definition provided in updated paragraph 6.405. The definition appropriately captures statutory nature conservation designations, irreplaceable habitats and areas supporting national rare or protected species. This addresses our previous concern regarding the lack of clarity over the meaning of the term.*

Proposed change

Amend Policy SP20 to improve clarity and avoid repetition with national policy:

Biodiversity in the Vale of Glamorgan will be protected, maintained and enhanced. All development proposals must demonstrate how they will contribute to the maintenance and enhancement of biodiversity and the resilience and connectivity of ecosystems. Proposals for new development must:

1 Avoid areas of high ecological value.

2 ~~Be accompanied by~~ **Consider whether** an ecological survey **is required. Where surveys are necessary, these must be completed in full and submitted as part of the application.** ~~and assessment of the likely impacts of the proposal on the biodiversity and ecosystem resilience of the development site. The survey and assessment to be proportionate to the nature and scale of the ecological value of the site and the nature and scale of the proposed development.~~

3 Demonstrate ~~through~~ the application of the ~~S~~**s**tep-wise approach **where developments have firstly been designed to avoid all adverse impacts. Where impacts cannot be fully avoided, they should be minimised, with mitigation to offset unavoidable impacts considered as the next step. Compensation should be seen as a last resort.** ~~that there has been an~~ **Developments will need to demonstrate an** overall net benefit for biodiversity proportionate to the nature and scale of the development.

4 ~~Ensure that International and UK protected species and habitats are protected in accordance with statutory requirements.~~ Protect the integrity of non-statutory ~~locally and regionally designated sites~~ **wildlife and geological sites** ensuring that they are appropriately protected and managed.

5 ~~Incorporate existing green infrastructure at the early stages of design, that protects and enhances existing site features and~~ **Ensure that development** improves the connectivity of the ecological network.

6 Be designed to avoid the introduction or spread of invasive non-native species~~. and where necessary, include proposals to eliminate, minimise, reduce and mitigate the impacts of invasive non-native species on biodiversity and ecosystems.~~

7 Incorporate nature-based solutions within the development to support biodiversity and build ecosystem resilience within the site and the wider area.

8 Make provision for the on-going maintenance and management of existing and newly created nature conservation interests proportionate to the nature and scale of the development.

9 **Protect trees, woodlands and hedgerows. Where losses are unavoidable, compensation will be required at the replacement levels set out in national planning policy.**

Where development is considered appropriate and the on-site delivery of nature-based solutions is not feasible or sufficient, planning obligations and/or conditions will be used to secure and maintain compensatory off-site habitats and measures. ~~that are functionally related to the assets within the site and contribute to the wider local nature recovery priorities.~~

6.403 Policy SP20 Biodiversity and Ecosystem Resilience recognises the importance of the Vale of Glamorgan's natural assets and seeks to ensure that they are protected, maintained and enhanced not only for their intrinsic nature conservation value, but also for the wider social, economic and community benefits that they provide.

6.404 The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) on public authorities in Wales. This duty requires that in the exercise of their functions, public authorities in Wales must seek to maintain and enhance biodiversity by ensuring development does not cause any significant loss of habitats or populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience.

6.405 **Areas of high ecological value can be defined as:**

1. **Statutorily Protected Sites - Within the Vale, this includes Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSIs).**
2. **Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed. Within the Vale this includes ancient woodland and veteran trees, ancient hedgerows, wet woodlands, peatland, species rich grassland, long undisturbed soils, salt marsh and lowland fen.**

3. **Areas with populations of nationally rare and/or declining species or protected species where mitigation and compensation measures are either difficult to achieve or where the likelihood of success is low.**

6.406 ~~Development~~ **Applications** will ~~therefore~~ be required to demonstrate that a net benefit for biodiversity can be achieved. A net benefit for biodiversity can be achieved through a range of actions ranging from habitat creation and/or long-term management arrangements that enhance existing degraded habitats ~~or semi natural habitats~~ and improve the resilience of ecosystems. Benefits must be long term, measurable **and** demonstrable ~~and primarily on site~~. Biodiversity enhancements should be delivered **by** following the step-wise approach of firstly avoiding **any adverse impacts**, then minimising, ~~with mitigation~~ **then mitigating**, **with compensation being considered** as a last resort for any negative impact. Where it is not possible to achieve on-site ~~mitigation~~ **compensation** and enhancement, off-site ~~compensation~~ **provision** must be provided to ensure a biodiversity net benefit. **This policy applies to all development proposals, including on non-statutorily local and regional sites such as Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs) and Regionally Important Geodiversity Sites (RIGS).**

6.407 Networks of natural habitats and green infrastructure provide a valuable ecological resource. They connect sites of biodiversity importance and provide **habitats for wildlife,** and stepping stones for the migration, dispersal and genetic exchange of species within the wider environment. To avoid fragmentation and isolation of natural habitats, it is essential that such networks are protected from inappropriate development and, where possible, enhanced. The Council's Green Infrastructure Assessment ~~identifies the green infrastructure provision within the Vale of Glamorgan and~~ contains a vision, recommendations, and action plan of how green infrastructure within the Vale can be extended and enhanced.

6.408 Sensitive design and choice of location of new development can have a positive effect on the Vale's built and natural heritage. Similarly, new development will be required to minimise its impact on natural systems **and** landscapes~~, species and habitats and where appropriate provide opportunities for the creation of new habitats or the sensitive enhancement of existing habitats. Consideration should be given to the Vale Nature Partnership's Nature Recovery Action Plan (NRAP) and any opportunities that exist to support the actions identified~~. **Applicants are advised to review the Council's Supplementary Planning Guidance on Biodiversity and Development for further information.**

6.408 Where a management plan is required, this should set out the immediate and on-going management proposals for the site **as well as** the future monitoring **and remediation** arrangements ~~and~~ **including** the funding mechanisms available to ~~meet~~ **deliver** the management plan objectives. The plan should include details of the proposed timescale for securing a net benefit for biodiversity within as short a time scale as possible.

6.409 Invasive Non-Native Species (INNS) are alien animals, plants or other organisms that can spread and cause harm to the environment, the economy and health.

Development proposals must be designed and implemented to avoid the spread or introduction of INNS. ~~and where INNS are known to exist or suspected to be present on a site, planning applications must include a survey and risk assessment undertaken by a competent professional that provides details of how the INNS will be controlled, eradicated or contained both during and after construction.~~ **In addition, where a Construction Environmental Management Plan (CEMP) is required as part of a planning permission, biosecurity measures must be included as part of this.**

6.410 **Trees, woodlands and hedgerows are important components of the Vale's green infrastructure network and provide a range of ecosystem services, including carbon sequestration, habitat provision, flood mitigation, air quality improvement and landscape enhancement. Existing trees, woodlands and hedgerows must be retained and integrated into development schemes. Applicants should also consider the requirements of the Council's Supplementary Planning Guidance on Trees, Woodlands and Hedgerows and Development and the Vale of Glamorgan Tree Strategy.**

6.411 Policy SP20 is supported by SP13 Community Infrastructure and Planning Obligations and SP19 Green Infrastructure. These require new development to provide new community infrastructure including Green Infrastructure and features that support net biodiversity benefit and to incorporate Green Infrastructure respectively.

6.412 Some areas in the east of the Vale of Glamorgan lie within 300m of the Severn Estuary SPA/Ramsar, the distance within which material visual and noise disturbance impacts to qualifying birds are likely to occur. As recommended by the RLDP Habitats Regulation Assessment **(HRA)**, to minimise the potential for visual and noise disturbance, any construction works on new sites within 300m of the Severn Estuary SPA/Ramsar should be undertaken in the summer months, when qualifying populations in the site will not be present. If this cannot be timed to avoid the non-breeding season, noise impact assessments will need to be undertaken to ensure that noise levels at sensitive receptors will remain non-disturbing. Appropriate screening will be required for construction works within 300m of any established high-tide roosts or key foraging areas within or outside the SPA/Ramsar. If the prevailing habitats are deemed suitable, non-breeding bird surveys of adjoining undeveloped land parcels should be undertaken to establish whether these are functionally linked to the SPA/Ramsar and if concluded to be the case, mitigation measures should also apply to these areas. **Development proposals that could potentially have an impact on the Severn Estuary European designations should be accompanied by an HRA. This will also need to consider run-off and air quality.**

Include a new policy on the Natural Environment as follows:

SPXX Natural Environment

To protect, conserve, restore and enhance the Vale of Glamorgan's natural environment and ensure the sustainable management of natural resources, all development proposals must demonstrate that they:

1. **Protect statutorily designated sites, non-statutorily wildlife and geology sites, protected habitats, protected species and species of principal importance as well as existing biodiversity assets, including trees, woodland and hedgerows, from adverse impacts.**
2. **Safeguard important landscapes, including Special Landscape Areas and the Glamorgan Heritage Coast.**
3. **Safeguard soil resources.**
4. **Protect and improve air quality.**
5. **Protect, maintain and enhance the quality and quantity of surface water and groundwater resources through the incorporation of sustainable drainage systems (SuDS), the use of nature-based solutions where appropriate, the protection of watercourses and riparian corridors, and the provision of suitable ecological buffer zones.**
6. **Maintain and strengthen ecological networks and green infrastructure connectivity across the Vale.**

The Vale of Glamorgan contains a diverse range of natural assets that contribute significantly to the area's environmental quality, biodiversity, landscape character, climate resilience and the health and well-being of communities. These assets include internationally, nationally and locally designated nature conservation sites, protected and priority habitats and species, woodlands, trees, hedgerows, rivers, coastal environments, agricultural land and valued landscapes. Protecting and enhancing these resources is essential to achieving sustainable development and supporting the sustainable management of natural resources.

Development proposals should avoid adverse impacts on biodiversity and ecological features wherever possible through appropriate site selection, design and layout. This policy should therefore be considered alongside Policy SP20 on biodiversity and ecosystem resilience.

Trees, woodlands and hedgerows are important components of the Vale's green infrastructure network and provide a range of ecosystem services, including carbon sequestration, habitat provision, flood mitigation, air quality improvement and landscape enhancement. Existing trees, woodlands and hedgerows should be retained and integrated into development schemes wherever possible. Particular regard should be given to the protection of ancient woodland, veteran trees and other irreplaceable habitats.

The Vale's landscapes make an important contribution to local distinctiveness, biodiversity, recreation and tourism. Development proposals should also consider the specific policies on Special Landscape Areas (DNP1) and the Glamorgan Heritage Coast (DNP3).

Soils are a finite and valuable natural resource that support food production, biodiversity, water management and carbon storage. Development should minimise the loss, degradation and sealing of soils and incorporate measures to conserve and appropriately manage soil resources during both construction and operation.

Poor air quality can have significant impacts on human health, biodiversity and environmental quality. Development proposals should minimise emissions, reduce exposure to air pollution and incorporate measures that contribute towards maintaining and improving air quality.

The protection and sustainable management of water resources is critical in responding to climate change and maintaining healthy ecosystems. Development proposals should protect surface water and groundwater resources from pollution and adverse impacts and should incorporate sustainable drainage systems (SuDS) and, where appropriate, nature-based solutions to manage water quantity and quality. The protection of watercourses, riparian corridors and associated habitats through appropriate buffer zones can help improve ecological resilience, reduce flood risk and enhance biodiversity.

The maintenance and enhancement of ecological networks and green infrastructure connectivity are essential for building ecosystem resilience and enabling species movement in response to habitat fragmentation and climate change. This policy should be considered alongside policy SP19 on Green Infrastructure.

6644 - Paragraphs 2.10-2.11

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.

Council response

The point is noted and a typographical correction will be made to remove the hyphen.

Proposed change

Remove the hyphens in South-Central in paragraphs 2.10 and 2.11.

6645 - Detailed Policies - Infrastructure

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.

Council response

The infrastructure requirements of housing sites are set out in Appendix 2 of the RLDP and also within BP44 Infrastructure Plan. It is not considered necessary to repeat requirements with in a plan policy for those sites that are not key sites.

6646 - 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.

Council response

Support is welcomed.

6647 - 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".

Council response

It is considered that the term 'natural heritage' would encompass ecology, so it is not considered that ecology needs to be considered separately.

6648 - 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.

Council response

A response to the comments raised is included in the site-specific response to EMP1.1.

6649 - 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.

Council response

The comments are noted. The search areas are large areas and, if proposals for renewable energy schemes are submitted, these will need to be supported by further ecological information. The supporting text for Policy CC3 is clear that any proposals will also need to comply with the requirements of other policies. This will include Policy SP20.

6650 - 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.

Council response

The proposed amendment is accepted as it is important that the terminology used is consistent with other policy documents.

Proposed change

Amend paragraph 2.81 to read '6 broad ecosystems' instead of '6 broad habitat types.'

7035 - Strategic Sites

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.

Council response

The comments are noted and support for the additional information provided is welcomed. Site specific comments are addressed under the relevant sites.

6651 - KS4 / 7030 KS5
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.

Council response

The comments are acknowledged. The Council notes that similar comments have been made in respect of the nearby allocation of Bro Tathan. Both key site allocations are supported by Preliminary Ecological Appraisals which have informed Masterplans for the sites.

The first phase of Church Farm (KS4) is also subject to a planning application where an Ecological Appraisal was submitted. This noted that there are "*no suitable waterbodies for great crested newt were identified within the Site nor within 2km of the Site. Combined with the dominance of nearby residential development and agricultural grassland, considered sub-optimal for a great crested newt population, presence of this species within the Site is considered unlikely.*" It also recorded no evidence of dormouse and concluded that "dormouse is presumed absent from the Site".

Through the application process, the Council will consider the wider impact on protected species and ensure that the matters raised are appropriately considered, in accordance with the step-wise approach and the green infrastructure strategy.

6652 - SP20 - 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).

Council response

The comments are noted. There is already a requirement in national planning policy for applications to be supported by a Green Infrastructure Statement, which should be proportionate to the scale and nature of the development.

The key sites are supported by both masterplans, informed by ecological surveys, and green infrastructure assessments (see Background Paper 32A Green Infrastructure Assessment of Key Sites).

6653 - Infrastructure Plan - 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.

Council response

Support for the requirement for updated ecological assessments is welcomed. For completeness, it is proposed that the list of evidence required to support a planning application be amended to highlight that there may be a need for protected species surveys, the exact nature of which will need to be determined in consultation with the Council's ecologist.

The reference to the inclusion of buffer zones for watercourses would not be relevant for the other key sites as these are not in close proximity to watercourses. The key site policy text for the other key sites also reference the need to retain green infrastructure assets on the site, so it is not considered necessary for additional wording to be included.

Proposed change

Expand bullet point on list of evidence required to support a planning application in Appendix 2 as follows:

There will be a requirement for up to date ecological appraisals and protected species surveys to be prepared, the exact scope of which will need to be determined in consultation with the Council's ecologist at the time of application. Should the surveys identify evidence of protected species, a detailed masterplan will need to demonstrate the retention, provision and enhancement of essential areas for protected species.

6654 - 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).

Council response

The Council welcomes NRW's support for the SANG policy.

A response to the comments raised is included in the site-specific response to KS1.

6655 - 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.

Council response

A response to the comments raised is included in the site-specific response to KS2.

Appendix 2 of the RLDP on Infrastructure Requirements highlights the need for up-to-date ecological surveys.

6656 - 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.

Council response

A GCN survey was prepared by the site promoters. This surveyed three ditches within the site boundary itself, plus Readers Way Pond, which has historically been a known breeding pond for GCN. The survey identified a negative result for GCN eDNA in two of the ditches on site. The third could not be surveyed as it was dry. Water samples could not be collected at the pond due to its overgrown nature with the surveyor concluding that it was not likely to sustain a breeding population.

Notwithstanding the findings of the survey, it is the view of the Council's ecologist that where a species that habitually uses the same site year on year, such as GCN, then the site would still be considered to be protected. As GCN are a long-lived species, the absence of suitable breeding conditions does not negate the ability of the site to support a GCN population in the future. Many individuals will still be present and will still migrate back to the pond to attempt to breed. Therefore, in order to conclude that the pond is not suitable for GCN, survey over several years would be required to demonstrate that GCN interest is no longer present. In this respect, the burden of proof is on the applicant to show that the pond is not used by GCN. The Council therefore considers that a precautionary approach should be taken and that appropriate mitigation will be required.

The Council have met with the site promoters and NRW to discuss how the Masterplan can be adapted to respond to the comments made by NRW. It was agreed that there is scope to include a woodland corridor along the eastern edge of the site in order to provide a suitable terrestrial habitat that connects to the countryside beyond.

Following the meeting, NRW advised that the following measures will be required to ensure that the site is able to provide suitable habitat and long-term management for GCN:

- Provide a minimum 20 metres wide corridor along the eastern side of the site.
- Locate the ponds in the north further away from the development and playing fields.
- Fence the ponds to prevent public access so they can be managed for GCN as opposed to being part of any public open space.

The site promoters have confirmed that they can accommodate the provisions without reducing overall dwellings numbers on site, although a minor change in the residential mix will be necessary. It is agreed that these requirements should be shown on the indicative plan in Figure 15 and referenced in the key site policy and Appendix 2.

It is recognised that this is in close proximity to the airport so consultation has taken place with Cardiff Airport who have agreed in principle to the inclusion of a woodland corridor in the area, subject to trees being no higher than others in the area.

Whilst the layout identified on the masterplan would need to be reconfigured to accommodate the corridor, it is considered that this can be achieved without affecting the number of units that can be delivered on site.

It is recognised that there will be a requirement for updated surveys to be undertaken at planning application stage.

Proposed Change

Under Key Site Policy Green Infrastructure, Recreation Spaces and Biodiversity amend the final bullet point as follows:

~~The provision of a pond that holds water and connected green infrastructure close to Readers Way Pond is required to provide~~ **In order to provide** an appropriate **terrestrial**

habitat for great crested newts**, a minimum 20 metre wide corridor must be provided on the eastern boundary of the site to provide a link to the wider countryside. Ponds should be provided in the north of the site. These should not form part of the open space and should be fenced and managed for great crested newts.**

Update the Indicative Plan for KS3 to show the GCN corridor and additional ponds to the north of the site.

6657 - 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.

Council response

The comments are noted.

6658 - 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.

Council response

The comments are noted.

Housing And Employment Allocations

6659 - 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.

Council response

The site's proximity to Barry Woodlands SSSI is recognised. The closest part of Pencoedtre Woodland area of Barry Woodland SSSI is located approximately 200m from the site. Whilst the part of the SSSI at Pencoedtre West is not publicly accessible, it is noted that NRW have previously raised concerns about unauthorised and unmanaged public access.

The importance of alternative areas of open space to reduce recreational pressure on the SSSI is acknowledged. There will be a requirement for the onsite provision of open space. It should also be noted that the area is well served by alternative open space, with a large open area of informal open space with an existing footpath network to the south of the site and the more formal Merthyr Dyfan Recreation Ground to the south west.

In order to ensure that the proximity to the SSSI is full recognised as a constraint, particularly in light of other comments that NRW have raised, it is proposed that reference is made to the proximity to the Barry Woodland SSSI in Appendix 2 of the RLDP and BP44 Infrastructure Plan.

Proposed change
Under the key site issues section of Appendix 2 and BP44 Infrastructure Plan, reference the following:

- The site is within 200m of Barry Woodland SSSI and the provision and/or enhancement of appropriate alternative open space on site and/or in the area to reduce recreational pressure on the SSSI will be required.

6660 - 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.

Council response

The comments are noted. Planning permission has recently been granted for a mixed use scheme including housing.

The application was supported by a project level HRA. NRW were consultees on the application, where it was concluded that the HRA demonstrates that with appropriate mitigation, there would be no adverse effect on the integrity of the Severn Estuary SAC, SPA and Ramsar site.

The Council's Shared Regulatory Services were also consulted on the planning application in respect of contamination. They advised that the submissions have identified contaminants of concern that will require remediation to make the site suitable for use. They advise that satisfactory approaches for remediation are detailed but a further remediation and verification will need to be undertaken. They also note that ground gas assessment is ongoing and provide advice with regard to soils/site won materials. Noting this they request conditions be attached to any permission given, relating to a ground gas assessment and protection measures; remediation and verification plan for contamination; associated remediation/verification being undertaken; unforeseen contamination; imported soils/aggregates and use of site won materials. An informative about contamination is also requested.

6661 - 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.

Council response

The comments are noted. Planning permission has recently been granted for 70 affordable dwellings.

The Council's Shared Regulatory Services were also consulted on the planning application in respect of contamination. They advised that the contamination assessment did not identify contaminants. A ground gas assessment was also submitted.

NRW were also consulted on the application and required a condition relating to unforeseen ground contamination.

6662 - 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.

Council response

The comments are noted. This requirement will be referenced in the Appendix 2 of the RLDP and BP44 Infrastructure Plan.

Proposed change

Include the following points under the key site issues and constraints in the Infrastructure Plan and Appendix 2 of the RLDP:

- 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.

6663 - HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)

A response to the comments raised is included in the site-specific response to HG1(5).

Council response

The comments are noted. The flood risk constraint on the periphery of the site is acknowledged within the plan, and it is the case that highly vulnerable development can be located outside of Zones 2 and 3. Only 18% of the site is affected by flood risk. A Strategic Flood Consequences Assessment for the site has been prepared (BP21A Flooding Appendix 2) and the plan makes clear that an FCA will be required at planning application stage.

6664 - 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.

Council response

The comments are noted. A planning application has been submitted for 105 dwellings. NRW have been consulted on the planning application, including a re-consultation in April 2026, and raised no objections.

The Council's Shared Regulatory Services have also been consulted. They have confirmed the need for conditions to be attached to any planning application.

However, as the site does not benefit from planning permission at this current time, it is considered appropriate to reference this constraint in Appendix 2.

Proposed change

Include the following point under the key site issues and constraints in the Infrastructure Plan and Appendix 2 of the RLDP:

- 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.

6665 - HG4 (1) Land 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.

Council response

The comments are noted. The potential sensitivity of the site's hydrological setting has been considered through the submitted Drainage Strategy & Flood Risk Assessment (October 2022). The report confirms that the site is currently a greenfield agricultural parcel and outlines a drainage strategy that has been specifically designed to protect groundwater and downstream receptors.

It is noted that the 2022 assessment was undertake for the original larger candidate site submission (CS 435) and a new assessment will be required to support any future planning

application. Any future drainage proposals will be subject to approval by the Vale of Glamorgan Sustainable Drainage Approval Body (SAB)

Notwithstanding this, the larger site acknowledge the need to safeguard ground water sources and therefore proposed a SuDS treatment, including permeable paving, bioretention areas (rain gardens), swales and detention basins to provide interception and treatment of surface water, removing pollutants such as sediments, hydrocarbons Accordingly, the Council is satisfied that the initial drainage strategy recognises the need to safeguard groundwater and the requirement for the site developer to undertaken a further drainage assessment for the smaller site shall ensures that pollution risks can be effectively managed and mitigated at the detailed design and construction stage.

For completeness, NRW's comments will be included in Appendix 2 of the RLDP as a key site constraint.

Proposed Change

Add the following to Appendix 2 of the RLDP:

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

6666 - 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.

Council response

A response to the comments raised is included in the site-specific response to SP14 (1).

6667 - 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.

Council response

A response to the comments raised is included in the site-specific response to SP14 (2).

6668 - SP14 (3) Bro Tathan Aerospace and Business Park Protected Species

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.

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.

Council response

The comments in relation to Bro Tathan are noted. It is recognised that the area has been subject to a number of applications since its designation in the adopted LDP. Where appropriate, the Council has required appropriate ecological surveys to be submitted and where mitigation has been necessary through the planning process, the Council has had regard to what has been secured on other sites to ensure the mitigation is consistent and complementary.

A response to the comments raised is included in the site-specific response to SP14 (3).

Proposed Change

Add the following to Appendix 2 of the RLDP:

The site is located within an important area for GCN and dormice. Full ecological surveys including protected species surveys will be required at planning application stage.

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.

Proposed Change

Add the following to Appendix 2 of the RLDP:

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.

6669 - 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.

Council response
A response to the comments raised is included in the site-specific response to SP14 (4).

Local Employment Allocations

6670 - 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.

Council response

The comments are noted.

For completeness and consistency with other employment sites, NRW's comments will be included in Appendix 2 of the RLDP as a key site constraint.

Proposed Change

Add the following to Appendix 2 of the RLDP:

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.

6671 - 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.

Council response

The site has planning permission for Class B1/B2/B8 development (2023/01147/FUL). NRW were consulted on the application and it was concluded that 'subject to conditions requiring works to be undertaken in accordance with the [submitted] FCA, the finished slab levels are set no lower than 7.7 metres (AOD) and requiring further details of flood warning mitigation the proposal is considered acceptable and could be appropriately managed in terms of flooding.'

In light of the planning permission, it is not considered necessary to list the constraints. In the event that the planning permission expires, the introductory section of Appendix 2 of the RLDP sets out the planning application requirements that are likely to be necessary to support an application.

6672 - 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.

Council response

The comments are noted.

For completeness and consistency with other employment sites, NRW's comments will be included in Appendix 2 of the RLDP as a key site constraint.

Proposed Change

Add the following to Appendix 2 of the RLDP:

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.

6673 - 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.

Council response

The site has planning permission for the erection of six buildings to provide 44 commercial units including access, associated parking, landscaping and attenuation ponds (2022/00883/FUL), approved in 2024, with a further application to vary conditions approved in January 2026.

In light of the planning permission, it is not considered necessary to list the constraints. In the event that the planning permission expires, the introductory section of Appendix 2 of the RLDP sets out the planning application requirements that are likely to be necessary to support an application.

6674 - Habitats Regulations Assessment (HRA)

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.

Council response

The comments on coastal squeeze, loss of functionally linked habitat and visual and noise disturbance are noted.

With regards to DNP8, it is accepted that there is a minor difference in the wording of the policy when the HRA and RLDP are compared. The HRA refers to the SAC/Ramsar/SPA as a European Marine Site, whereas the RLDP refers to it more directly as the SAC/Ramsar/SPA. This different has no impact on how the policy is interpreted so this is not considered that this is a matter that requires any amendments to the policy. It also considered that the title of the policy is appropriate.

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.

Council response

The Severn Estuary SAC/Ramsar/SPA extends alongside the estuarine coastline between Penarth and Lavenock Point. However, the Ramsar and SPA also includes Sully Island, a tidal island off the coast at Swanbridge, which is only accessible for 3 hours either side of high tide. The HRA concluded that as Sully Island is not readily accessible it is unlikely to be impacted by recreational pressure resulting from the RLDP and therefore the 12.6km boundary was drawn from the Penarth to Lavernock Point coastline rather than from Sully Island. However, if the boundary also included Sully Island, 12.6km would also include KS3 Land at Readers Way.

The Council has appointed Footprint Ecology to prepare a mitigation strategy for recreational pressure on the Severn Estuary SAC/Ramsar/SPA. This is a joint commission with Cardiff. As no visitor data is currently available to assess how many visitors there are to Sully Island in the winter months (the time that the island is used by wintering birds) it cannot be ruled out definitively that there is no recreational pressure and it is therefore proposed to take a precautionary approach to the assessment. The consequence of this is that the 12.6km boundary will be amended so that it includes Sully Island Ramsar/SPA rather than just the SAC. The consequence of this is that KS3 will now be included in the boundary and therefore the site will need to form part of the SANG and SAMM mitigation strategy. This will need to be referenced in the plan.

Proposed Change

Add the following bullet point to Policy KS3

- The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary.

6675 - 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).

Council response

The Council welcomes NRW's agreement with the scope of the Strategic Flood Consequences Assessment (SFCA).

An Addendum to the Stage 1 SFCA has been undertaken which summarises a number of initiatives relevant to natural flood management, nature based solutions and wider working with natural processes specifically within the Cadoxton area. This includes reference to the Natural Flood Management Scheme in the Cadoxton catchment, which is currently being progressed by Coed Cadw and NRW. This will provide multiple benefits, mainly to 'slow the flow' and reduce flood risk downstream at Dinas Powys.

Criterion 10 of Policy SP16 on Climate Change Mitigation and Adaption references the requirement for new development to suitably control surface water run-off through the application of sustainable drainage systems and nature based solutions. Nature based solutions are also referenced in the supporting text for the green infrastructure policy. It is not considered necessary to reference specific schemes in the policy as there will likely be a number of schemes delivered in the plan period that are not known about at this current time, but the high level policy framework is supportive of this.

The Addendum has been shared with NRW who concluded in a later dated 7th July 2026 that "*We welcome Section 4 which relates to natural processes and natural flood management, and presents a summary of the Nature Based Solutions and Natural Flood Management Schemes within the Cadoxton river catchment. This satisfies the previous comments we made on this aspect within our previous response (ref: CAS-297522-L5K4, dated 11th March 2026).*"

6676 - 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). Please note that our State of Natural Resources Report (SoNaRR) is now in its third assessment with SoNaRR 2025 recently published (January 2026).

Council Response

The comments that NRW refer to in their previous correspondence specifically in respect of the GIS were as follows:

- We agree with the approach and content of the GIA and support the timeframes for the GIA to run concurrently with the Replacement Local Development Plan (RLDP). We also welcome the proposed Green Infrastructure Zones, which we consider to successfully represent the Vale.
- We suggest that Section 3.3 relating to Water Assets is missing clarification on the extent of the Green Infrastructure (GI) scope into the coastal/marine environment. Furthermore, within Section 3.3.4, we suggest including reference to the Bristol Channel, as the Vale is only adjacent to the Severn Estuary until Lavernack Point.
- We advise that further detail is provided within the GIA/GIS regarding how the GI Zones and GI corridors work together and should be considered in a Green Infrastructure Statement.
- We note the 'needs and opportunities' which are listed within Section 3.3.5, 3.4.5, 3.5.5, 3.6.6 and 3.7.7 of the GIA. However, we advise that these should read more as strategic opportunities which benefit from SMART objectives, timelines, spatial application/maps and allocation of responsibility/partnership. Although we support the needs and opportunities listed, these should be refined further to be applicable to developers and local Green Infrastructure plans.
- We note that no reference to 'areas of high ecological value' is made within with GIA or wider GIS document. Therefore, we would reiterate these previous comments in this regard and would point out that if different terminology has been used between the RLDP and GIS, then this should be made consistent.
- We welcome the inclusion of the South Central Wales Area Statement. We advise that the strategy seeking to ensure that GI delivery supports (list of policy plans) also includes the South Central Area Statement, which would fulfil Section 11 5b of the Environment Act.
- We also advise that the GI Strategy could also support the Vale Local Nature Partnership local Nature Recovery Action Plan and the Vale 30 by 30 ambition, once both are finalised. These could also be referenced, as well as the Area Statement, in Section 1 and 2.2, to ensure full join up across these plans to meet the well-being goals.
- In addition, we advise updated references to PPW12 and on completion of the SINC review, that GIA maps are updated to reflect any changes (e.g. Page 24, 3.4.2. and Map 3.4).
- We advise the GI strategy does not unintentionally affect nature recovery activity, and vice versa. Awareness of planned GI interventions needs to be shared with partners through the PSB and Local Nature Partnership, so that multiple benefits are more likely to be achieved. This has recently been shown with awareness of the active travel route between Penarth and Sully, and how that interacts with the nature networks either side, as well as itself acting as a corridor improving connectivity in the landscape.

NRW's support for the approach and content of the GIS is noted.

The Strategy was prepared by CBA Studios in late 2023 at which time the RLDP was at Preferred Strategy stage. It is recognised that there is a need to update the GIS to reflect the current status of the RLDP. Whilst a small number of minor editorial changes were undertaken in the version published to support the Deposit RLDP, it has always been the Council's intention to fully update the Green Infrastructure Strategy to take account of all consultation responses after the Deposit consultation. It is also recognised that the strategy will need to be subject to regular review.

With regards to PPW12, an update to Chapter 6 of PPW was published with immediate effect in October 2023, following the publication of a consultation draft in spring 2023. It was then incorporated into PPW Edition 12 in February 2024. The version of the strategy that NRW commented on refers to the Chapter 6 update as the PPW Edition 11 (2023 update). However, the reference to PPW12 was amended in the version published for public consultation as part of evidence base for the Deposit RLDP. NRW have raised no concern about the conformity of the GIS with the content of PPW and their comments from 2024 relate only to the PPW reference, not that the strategy hasn't taken account of the updated Chapter 6 of PPW.

The Council agrees that the Vale Local Nature Partnership local Nature Recovery Action Plan and the Vale 30 by 30 ambition should be referenced as suggested. The support for references to the South Central Wales Area Statement is noted.

It is also agreed that paragraph 3.4.2 should be amended to reflect the updated number of SINCs as well as amendments to Map 3.4.

NRW's comments in respect of the scope of the Water Assets section in respect of the coastal and marine environment are acknowledged. The GIS does recognise the importance of blue infrastructure and that the coast is a GI asset. In terms of the marine environment, the Council notes that the Welsh National Marine Plan has not been specifically referenced in Box 2.5. This should be added into the GIS as it provides an important policy context for the marine plan area, which covers the area from mean high water spring tides out to 12 nautical miles. It is important that the GIS supports the policy framework set out in the Marine Plan.

In addition to the GIS, the Council does intend to prepare Supplementary Planning Guidance on how blue and green infrastructure can be embedded into specific developments, which will help provide further guidance on the other matters raised, including how the GI Zones and GI corridors can be applied in Green Infrastructure Statement. In addition, the intention is for the GIS to be supported by an Action Plan to take forward the delivery of strategic objectives and priorities.

Proposed changes

The following changes are proposed to the Green Infrastructure Strategy in light of NRW's comments:

- Add a reference to Vale Local Nature Partnership local Nature Recovery Action Plan and the Vale 30 by 30 ambition in Sections 1 and 2.2.
- Update paragraphs 2.2.2-2.2.3 and Box 2.4 to reflect the Deposit stage of the RLDP.
- Update the reference to the State of Natural Resources Report from 2020 to 2025 in Box 2.5 and update the relevant section in Appendix 1 to reflect the updated report.
- Update Box 2.5 to reference the Wales National Marine Plan.
- Amend paragraph 3.3.4 to read "The Severn Estuary **and Bristol Channel** ~~is~~ **are** also ~~a~~ potential source**s** of tidal flooding in the Vale."
- Update paragraph 3.4.2 and Map 3.4 to reflect the SINC review findings.

ANNEX 2 – CHAPTERS 2-5 AND CONSULTATION PROCESS

This section addresses the representations made on the first five Chapters in the Deposit RLDP, as well as comments made on the consultation process more generally.

- Chapter 2 - National, Regional and Local Policy Context
- Chapter 3 - The Vale of Glamorgan Key Characteristics
- Chapter 4: Key Themes, Vision and Objectives
- Chapter 5 - Strategic Growth Area, Key Diagram and 6 Strategy Components
- Consultation Process

POLICY CONTEXT

A total of 19 Representations (5 support, 8 Object and 6 comment) were submitted in respect of the RLDP Policy Context. Welsh Government confirmed that the RLDP is in general conformity with national policy, including Future Wales, the National Development Framework and welcomed the joint working that has been undertaken by the Vale and neighbouring authorities. There was also support from other organisations and individuals.

However, a number of issues were raised by other respondents including the need for stronger references to designated sites, advanced warning of future policy changes such as the publication of the third review of Regional Technical Statement on Aggregates and concerns about infrastructure and addressing the climate and nature emergencies.

The representations and responses are categorised as per the Deposit Plan as National Policy and Legislation, Regional Policy Context and Local Policy Context.

NATIONAL POLICY AND LEGISLATION

STATUTORY CONSULTEE RESPONSES

5112 - Welsh Government (Planning Division) - Support

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.

Council Response

The Council notes the Welsh Government's confirmation in respect of the RLDP conformity with national policy.

The Council also acknowledges Welsh Government's support in respect of the joint working that has been undertaken between the Vale of Glamorgan and its neighbouring authorities in the preparation of the Vale of Glamorgan RLDP.

6644 – Natural Resources Wales

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.

Council response

The point is noted and a typographical correction will be made to remove the hyphen.

Proposed change

Remove the hyphens in South-Central in paragraphs 2.10 and 2.11.

INDIVIDUAL RESPONSES

SUPPORT

7124 - Seth Hill & Son Ltd (Highlight Planning) - Support

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

Council Response

Support is noted.

COMMENTS/OBJECTIONS

6587 - Haines - Object

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

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

Suggested Change

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

Council Response

Comments are noted.

The Council consider that the level of growth proposed within St Athan is commensurate with its wider regional strategic role and aspirations for the area as highlighted by the Welsh Government's economic growth commitments at Bro Tathan and those of the Capital City Region in respect of the regeneration of the former Aberthaw Power Station. Both of these projects are highlighted within the Deposit RLDP as major employment opportunities for the Vale of the Glamorgan**.**

The allocation of housing within St Athan will provide housing opportunities close to these areas of employment growth. The RLDP has safeguarded land for key infrastructure, including for a new transport interchange at St Athan.

In addition, the RLDP is supported by an Infrastructure Plan (Background Paper 44) that details the site-specific infrastructure requirements for the key housing sites, which include the securing of facilities that will benefit the whole of St Athan, including new education provision, additional and enhanced open spaces and community facilities. It is also noted that Key Site Land at Church Farm includes proposals for a new retail store.

7056 - Barratt Redrow Homes (Highlight Planning) - Object
7133 - Tom Prichard (Holdings) Ltd (Highlight Planning) - Object

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

Suggested Change

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

Council Response

Comments are noted. In respect of the Development Plans Manual there is no mandatory requirement for the RLDP to have 10 years remaining on adoption of the plan. The wording of the DPM at paragraph 7.4 states that "When a plan is adopted, there should be at least 10 years left of the plan period remaining." If this was a requirement then the DPM manual should explicitly state that there "must" be at least 10 years of the plan remaining. The Council have engaged with the Welsh Government Planning Division in the preparation and revision of its RLDP Delivery Agreement and the proposed timetable to adoption has been agreed by Welsh Government.

REGIONAL CONTEXT

STATUTORY CONSULTEE RESPONSES

5113 - Welsh Government (Planning Division) - Support

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.

Council response

The Council acknowledges Welsh Government's support in respect of the joint working that has been undertaken between the Vale of Glamorgan and its neighbouring authorities in the preparation of the Vale of Glamorgan RLDP.

6938 - Penarth Town Council – Comment

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

There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan. It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Suggested Change

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

Council Response

The comments are noted. In preparing its RLDP, the Council has published a joint position statement with its closest neighbouring authorities to highlight the Vale's relationship and interactions with these areas. These statements were included as part of a Background Paper (BP20A), which also details collaboration with all ten authorities in the CJC area. It is accepted that the Deposit RLDP only summarises the regional collaboration. However, the full background paper (BP20A) was published as part of the evidence base for the Deposit RLDP consultation.

INDIVIDUAL RESPONSES

SUPPORT

6803 - Mineral Products Association

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

Council Response

Support is welcomed. The preparation of RTS3 is noted.

5686 - Cardiff Capital Region Energy

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

Council Response

Support is noted.

COMMENTS/OBJECTIONS

4655 – Griffiths - Object

I find that councils joining together in large projects where large amounts of taxpayers money is put into projects and not doing due diligence on possible pitfalls leaving them open

to large financial penalties. Leaving local taxpayers to pick up the fallout from lack of business acumen.

Suggested Change

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

Council Response

Comments are noted. The points raised within the representation are beyond the influences of the RLDP.

LOCAL POLICY CONTEXT

STATUTORY CONSULTEE RESPONSES

6641 – Natural Resources Wales

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.

Suggested Change

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.

Council response

The support for the Council's declaration of a nature emergency is welcomed, as is the support for the policy framework in respect of biodiversity, which seeks to mitigate against potential adverse effects.

The comment that there should be specific mention of designated conservation areas and their relationship is noted. The ISA states that "it is recommended that the relevant Key Site policies are updated to include specific reference to the designated sites they are within proximity to, in order to help establish appropriate protection and / or enhancement measures."

Whilst the site-specific policies for the key sites and the infrastructure delivery plan do recognise specific biodiversity constraints, including highlighting where key sites are within the 12.6km core recreational catchment zone for the Severn Estuary SAC, it is accepted that much of the description is in relation to on site constraints rather than proximity to designated sites outside of the site boundary. The comments that NRW have made in respect of this have been responded to as part of the site-specific composite responses for each key site allocation, but in principle the Council agrees that reference should be made to designated sites where these have the potential to be a wider constraint to development. For key sites this should be included in both the key site policy text and Appendix 2, the Infrastructure Delivery Plan. For non-key sites, reference should also be made within Appendix 2. The Infrastructure Delivery Plan Background Paper should also be amended to reflect these changes.

Proposed change

Reference the proximity of allocated sites to statutorily designated sites as a constraint to development within the Appendix 2 - Infrastructure Delivery Plan and, where relevant, the key site policies. The Infrastructure Delivery Plan Background Paper should also be amended accordingly. The exact wording for each site is referenced under the composite response for each site.

6650 - Natural Resources Wales

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.

Council response

The proposed amendment is accepted as it is important that the terminology used is consistent with other policy documents.

Proposed change

Amend paragraph 2.81 to read '6 broad ecosystems' instead of '6 broad habitat types.'

INDIVIDUAL RESPONSES

SUPPORT

5688 - Cardiff Capital Region Energy

CCR Energy welcomes the recognition within the Vale of Glamorgan Corporate Plan 2025–2030 of the Council's commitment to delivering a Replacement Local Development Plan that

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

Council Response

Support and comments are noted.

COMMENTS/OBJECTIONS

4656 – Griffiths – Object

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

Suggested Change

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

Council Response

The comments are noted. However, it is important to recognise that the RLDP must address a number of different priorities, as evidenced in the local policy context section. This includes making provision for housing and addressing affordable housing need, while also balancing this with the protection of the most environmentally valuable areas.

Where large housing sites have been allocated, such as in Dinas Powys, these are located in areas that are well served by existing services and facilities, in order to reduce the need to travel, and in locations with both existing and proposed public transport connectivity.

The RLDP has considered the necessary infrastructure requirements to support the level of development proposed, as detailed within Infrastructure Background Paper 44. Additionally, infrastructure requirements are set out within each Key Site policy in the plan.

With regard to the comments made in respect of the Dinas Powys bypass, this matter is discussed in detail within the site-specific response for Key Site HG1 KS2 Land North of Dinas Powys.

5449 – Entwistle - Object

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

Suggested Change

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

Council Response

The comments are noted. The purpose of the policy context of the plan is to highlight those areas of local policy that the Deposit Plan must have regard for, not to replicate any monitoring outcomes with the Deposit Plan monitoring framework. It should also be recognised that some targets are outside of the remit of the RLDP.

For example, the Vale of Glamorgan Well-Being Plan 2023-28 contains an objective for increasing physical activity. The RLDP reflects these objectives through land use planning policies that encourage new developments to support opportunities for physical activities, walking and cycling and the provision of green multifunctional green spaces. In respect of increasing green spaces, rather than setting specific targets for additional provision, the plan contains policies that place specific requirements for the provision of open spaces within new developments and policy which prioritises the protection of such spaces.

THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Four duly made representations were received in relation to the Key Characteristics section of the Plan. These included one representation in support and three objections: one concerning the statement that Barry is the most sustainable location for development in the Vale, one relating to Census data, and one concerning smaller rural settlements and hamlets in relation to the settlement hierarchy.

STATUTORY CONSULTEE RESPONSES

6338 - Penllyn Community Council – Object

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

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

Suggested change

Amend paragraph 3.11.

Council response

The settlement hierarchy is informed by BP5: Settlement Appraisal Review, which assesses each settlement in terms of the number of residential properties and estimated population, as well as a range of other factors, including the availability of key facilities (such as schools, health facilities and retail centres) and services that support daily needs (including convenience stores, post boxes, community buildings, public houses and play areas).

Paragraph 3.5 of the RLDP recognises these settlements as distinct communities and lists them within the hamlets and smaller rural settlements tier of the hierarchy. It is accepted that some community facilities are shared between more than one settlement. However, in the example provided (City and Llansannor), even if the two settlements were considered as a single settlement, the combined range of services and facilities would not be sufficient to justify its classification as a Minor Rural Settlement.

INDIVIDUAL RESPONSES

SUPPORT

5691 - Cardiff Capital Region Energy

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

Council response

Support is noted.

COMMENTS/OBJECTIONS

5450 - Entwistle - Object

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

Suggested change

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

Council response

As detailed in the evidence base, Barry is the largest settlement in the Vale of Glamorgan and it is the only 'key settlement' within the settlement hierarchy based on its population, provision of key services and facilities, public transport accessibility and frequency, and employment opportunities. The Council maintains that it is the most sustainable location in the Vale and as a consequence there is a need for Barry to accommodate a level of housing growth that is commensurate with its role and function.

Where mitigation is required as a result of new development (for example to secure additional schools places and deliver sustainable transport and highways improvements) this will be secured through the Section 106 process.

5645 - Barnaby – Object

The census of working population should be undated 2011 - 15yrs out of date with significant changes in the Vale with loss of MOD St Athan workforce, and more recently St Athan Power Station, makes this document to be not suitable for evidence base for the LDP in respect of infrastructure and housing need. The LDP should focus on the Well-being of

residents present and potentially new - traffic congestion, space in local schools, doctors etc., and green space/trees should be a significant consideration in this plan!

Suggested change

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

Council response

The Key Characteristics section already references working-age population data from the 2021 Census, with 2011 Census data used for comparison where appropriate. For example, Figure 4 shows the change in population by age group between the 2011 and 2021 Censuses. The only area where 2011 Census data has been used exclusively is in relation to commuting flows, as the 2021 Census was undertaken during the pandemic, which is likely to have influenced travel-to-work patterns.

The RLDP is supported by an extensive evidence base relating to infrastructure provision and the delivery of affordable housing to meet identified needs.

Bro Tathan (St Athan Enterprise Zone) is identified in the RLDP for employment purposes, which could include small industrial units where required. The policy also allows for complementary ancillary non-B uses where these would provide supporting services for existing and future businesses and employees.

The RLDP makes provision for Rural Affordable Housing-Led Sites (Policy HG4) as well as Affordable Housing Exception Sites (Policy H5). As indicated in its representation on the Deposit RLDP, the Welsh Government is supportive of these policy approaches.

KEY THEMES, VISION AND OBJECTIVES

Seven representations were made on the Key Themes of the Deposit RLDP. These comprised three representations in support, two comments and two objections. The comments suggested that the Plan should include policies and objectives relating to traditional architecture, and that the key themes do not adequately address issues such as the cost of living and impacts on communities. Concerns were also raised regarding a perceived conflict between the key themes and the proposed site allocations, together with an apparent lack of monitoring arrangements.

KEY THEMES

INDIVIDUAL RESPONSES

SUPPORT

6191 - Ambrose

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

Council response

Support is noted.

6767 - Persimmon Homes (Boyer Planning)

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

Council response

Support is noted.

6900 - Barratt Redrow Homes (Boyer Planning)

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

Council response

Support is noted.

COMMENTS/OBJECTIONS

4566 - Barton – Comment

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

Council response

The key themes were derived through extensive engagement with the stakeholders, as detailed in BP2 Issues, Vision and Objectives. This included a key theme around Placemaking, which encompasses good design. The suggested additional theme is a detailed matter, not an overall theme for the plan, and therefore the Council does not consider that it should be included.

5299 - Timmins – Comment

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

Council response

The Council acknowledges the concerns raised regarding rising living costs and the impact of development on existing communities. Whilst housing and fuel costs are outside the remit of the RLDP, which is a land use planning document, the RLDP can make a contribution towards this through the allocation of new housing in sustainable locations reducing the need to travel, and through affordable housing policies.

With regards to the impact of development on communities, the Plan has been informed by an extensive evidence base and aims to balance the need to accommodate future growth with the protection of the Vale's communities and environment. The Council recognises that development proposals can give rise to local concerns; however, the RLDP includes policies to ensure that new development is appropriately planned, supported by necessary infrastructure, and designed to minimise adverse impacts on existing communities. The Council therefore considers that the Plan provides an appropriate framework to help address the economic, social and environmental challenges facing the Vale of Glamorgan over the Plan period.

4660 - Griffiths – Object

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

Suggested change

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

L left

What a reputation to have

Council response

The Council does not agree that the objectives of Building a Prosperous and Green Economy and Protecting and Enhancing the Natural Environment are incompatible with the proposed development strategy. The RLDP seeks to balance the need to accommodate future growth, including housing and employment development, with the protection and enhancement of the Vale of Glamorgan's natural environment.

All candidate sites and allocations have been subject to a robust assessment process, including consideration of environmental constraints, landscape impacts, biodiversity interests and their relationship to existing settlements. Due to limited opportunities within existing settlements, it has been necessary to allocate greenfield on the edge of settlements, but this does not mean that the environmental objectives of the Plan are undermined. The RLDP includes a range of policies to protect biodiversity, maintain ecological networks, safeguard landscapes and ensure that development incorporates appropriate mitigation and enhancement measures.

5451 - Entwistle – Object

The key themes do not go far enough and lack measurable goals. There is no real accountability to these goals. Instead of stating simply things like "Prioritise climate change adaption and mitigation" they should set a concrete goal that can be held accountable with figures and data. There should be quantifiable goals in these key themes. ie ensure all new housing built in the vale exceeds the goals set for new builds in terms of meeting the Uk future homes standard. Or increasing the number of journeys undertaken by active travel from x percent to x percent.

Council response

The themes, vision and objectives have been translated into strategic policies. A monitoring framework which assesses delivery against the strategic objectives and strategic policy is set out in Appendix 3 of the RLDP. An Annual Monitoring Report will be prepared to monitor progress.

VISION

A total of 12 representations were made on the Vision of the Deposit RLDP (2 support, 5 comments, 5 objections). The issues raised included whether the reference to the marina remains relevant, concerns regarding the achievability and aspirational nature of the Vision, questions about its reference to the South Wales Metro, and whether specific settlements should be referenced. Individual responses to each representation are set out below.

INDIVIDUAL RESPONSES

SUPPORT

5694 - Cardiff Capital Region Energy

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

Council response

Support is noted.

6891 Catesby Estates (Turley)

The vision for the Deposit RLDP maintains that, by 2036, VoGC will provide housing growth which responds to the authority's growing population and caters for all. This should be shaped through successful placemaking, delivering diverse communities and ensuring that the Vale is a healthy and inclusive place for everyone.

VoGC identifies key themes and strategic objectives to deliver the vision of the Deposit RLDP. This includes "ensuring that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population", to address the accommodation needs of all the Vale's communities (Objective 3 - Homes for All). Objective 4 – Placemaking also seeks for new development to be appropriately located, contribute towards creating active, safe and accessible places, and protect and enhance the character of existing communities.

The provision of a mix of new homes is also crucial in fostering diverse, vibrant and connected communities in line with Objective 7. Consequently, physical, economic and social regeneration are facilitated, reflecting the needs and aspirations of local communities. Vital and vibrant rural communities are also provided through the delivery of growth in sustainable locations and supporting infrastructure.

Catesby broadly SUPPORTS the vision and strategic objectives of the Deposit RLDP to deliver a mix of high-quality new housing which responds to the authority's growing population, caters for all, and has placemaking at its heart. This new housing should be facilitated across the Vale in a variety of sustainable locations to best serve as many communities as possible.

Council response

Support is noted.

COMMENTS/OBJECTIONS

4567 - Barton – Comment

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

Council response

This is a detailed matter than would not fit within a high level vision.

4661 - Griffiths – Object

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

Suggested change

Net Zero impossible to achieve.

Council response

The Vision looks forward to 2036, establishing the overall direction for the Vale. It is a high-level vision which does not set specific targets, albeit it does reference the Council's target of reducing the Council's own carbon emissions to net zero by 2030 and encouraging others to make positive changes. At this early stage in the plan period, it is not appropriate to conclude that the plan is failing – indeed the progress towards net zero across a number of policy areas is positive.

5042 - Hussey – Object

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

Suggested change

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

Council response

The Council has deliberately adopted an aspirational Vision that sets the direction of the RLDP and how it wishes to see the Vale of Glamorgan in 2036.

The themes, vision and objectives have been translated into strategic policies. A monitoring framework which assesses delivery against the strategic objectives and strategic policy is set out in Appendix 3 of the RLDP. An Annual Monitoring Report will be prepared to monitor progress.

5405 - Reed – Object

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

Suggested change

Remove reference to SW Metro.

Council response

The Council considers that reference to the South Wales Metro in the Vision is entirely appropriate. As identified in the Cardiff Capital Region Regional Transport Plan (RTP), the South Wales Metro includes the existing stations on the Vale of Glamorgan line, including Rhoose. Whilst St Athan does not currently have a station, the RTP references investigating opportunities for additional rail infrastructure and passenger services at St Athan and funding has been awarded to Transport for Wales (TFW) to support further feasibility work for a St Athan station. There are also proposals to increase the frequency of services on the Vale of Glamorgan Line to two trains an hour between Barry and Bridgend, which will serve the existing station at Rhoose.

5406 - Reed – Object

Is the Marina actually happening?

Suggested change

Remove reference to Marina

Council response

At the time that the Vision was originally drafted as part of the Preferred Strategy, there were plans for a marina at Barry Waterfront. The marina proposal formed part of wider redevelopment project for the area at the Mole. In May 2025, Associated British Ports (ABP) announced that they could no longer proceed with the significant investment required for the marina. The Council has secured UK Levelling Up funding for the other elements of the project, which includes new housing, a linear park and a watersports centre, with planning permission for these uses being granted in July 2025 (subject to the signing of a Section 106 agreement).

In light of the above, it is considered that it would be appropriate to remove reference to the marina from the Vision and instead replace it with a reference to the watersports centre.

Proposed change

Amend the Vision as follows:

The town and local retail centres are vibrant places, while the new ~~marina~~ **watersports centre** at Barry Waterfront and revitalised Barry Island provide all year-round tourism.

5452 - Entwistle – Object

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

Suggested change

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

Council response

The themes, vision and objectives have been translated into strategic policies. A monitoring framework which assesses delivery against the strategic objectives and strategic policy is set out in Appendix 3 of the RLDP. An Annual Monitoring Report will be prepared to monitor progress.

5882 - HBF – Comment

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

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

Council response

The Vision was derived through extensive engagement with the stakeholders, as detailed in BP2 Issues, Vision and Objectives.

At the time that the Vision was originally drafted as part of the Preferred Strategy, there were plans for a marina at Barry Waterfront. The marina proposal formed part of wider redevelopment project for the area at the Mole. In May 2025, Associated British Ports (ABP) announced that they could no longer proceed with the significant investment required for the marina. The Council has secured UK Levelling Up funding for the other elements of the project, which includes new housing, a linear park and a watersports centre, with planning permission for these uses being granted in July 2025 (subject to the signing of a Section 106 agreement).

In light of the above, it is considered that it would be appropriate to remove reference to the marina from the Vision and instead replace it with a reference to the watersports centre.

Proposed change

Amend the Vision as follows:

The town and local retail centres are vibrant places, while the new ~~marina~~ **watersports centre** at Barry Waterfront and revitalised Barry Island provide all year-round tourism.

6178 - Vincent – Comment

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

Council response

The Council has deliberately adopted an aspirational Vision that sets the direction of the RLDP and how it wishes to see the Vale of Glamorgan in 2036.

6930 - Barratt Redrow Homes (Boyer Planning) – Comment

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

Suggested Change

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

Council response

The support for the Vision is welcomed. The Vision was derived through extensive engagement with the stakeholders, as detailed in BP2 Issues, Vision and Objectives and refined following the consultation on the Preferred Strategy.

Whilst the four main towns in the Vale are referenced, it is not considered necessary to make reference to other settlements within the Vision as the Vision more generally references housing development to cater for all.

6931 - Persimmon Homes (Boyer Planning) – Comment

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

Suggested Change

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

Council response

The support for the Vision is noted. The Vision was derived through extensive engagement with the stakeholders, as detailed in BP2 Issues, Vision and Objectives and refined following the consultation on the Preferred Strategy.

Whilst the four main towns in the Vale are referenced, it is not considered necessary to make reference to other settlements within the Vision as the Vision more generally references housing development to cater for all.

STRATEGIC OBJECTIVES

Thirteen representations were made on the strategic objectives of the Deposit RLDP (4 support, 4 comments, 5 objections). The issues raised included the omission of reference to the Port of Barry, the need for references to traditional architecture, requirements for targets and the remit in respect of health and transport. Individual responses to each representation are included below.

STATUTORY CONSULTEE RESPONSES

4697 - Heneb – Comment

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

Suggested Change

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

Council response

The change in name of the organisation is noted. The RLDP already refers to Heneb: The Trust for Welsh Archaeology in paragraph 6.428. There is no reference to the organisation in the strategic objectives so no amendments are required.

6618 - South Wales Police – Secured by Design Officer - comment

1. Mitigating and adapting to climate change - There are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and stolen property from within the home as a result of criminal acts.

2. Improving mental and physical health and well-being - Poorly designed and specified public realm and communal areas have the potential to generate crime, the fear of crime and anti-social behaviour.

3. Homes for all - South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design. Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of VAWG.

5. Protecting and enhancing the natural environment - South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.

Council response

The comments are noted. South Wales Police are a consultee on relevant planning applications.

INDIVIDUAL RESPONSES

SUPPORT

5695 - Cardiff Capital Region Energy

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

Council response

Support is noted.

6768 - Persimmon Homes (Boyer Planning)

Persimmon supports the principle of Objective 3 - Homes for All, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live. They also support Objective 4 - Placemaking and Objective 8 - Promoting Active and Sustainable Travel Choices.

Council response

Support is noted.

6892 - Catesby Estates (Turley)

The vision for the Deposit RLDP maintains that, by 2036, VoGC will provide housing growth which responds to the authority's growing population and caters for all. This should be shaped through successful placemaking, delivering diverse communities and ensuring that the Vale is a healthy and inclusive place for everyone. VoGC identifies key themes and strategic objectives to deliver the vision of the Deposit RLDP. This includes "ensuring that all new residential developments provide high quality housing that includes the right mix,

tenure and type of homes that respond to the changing needs of the Vale's population", to address the accommodation needs of all the Vale's communities (Objective 3 - Homes for All). Objective 4 – Placemaking also seeks for new development to be appropriately located, contribute towards creating active, safe and accessible places, and protect and enhance the character of existing communities. The provision of a mix of new homes is also crucial in fostering diverse, vibrant and connected communities in line with Objective 7. Consequently, physical, economic and social regeneration are facilitated, reflecting the needs and aspirations of local communities. Vital and vibrant rural communities are also provided through the delivery of growth in sustainable locations and supporting infrastructure. Catesby broadly SUPPORTS the vision and strategic objectives of the Deposit RLDP to deliver a mix of high-quality new housing which responds to the authority's growing population, caters for all, and has placemaking at its heart. This new housing should be facilitated across the Vale in a variety of sustainable locations to best serve as many communities as possible.

Council response

Support is noted.

6901 - Barratt Redrow Homes (Boyer Planning)

Barratt Redrow supports the principle of Objective 3 - Homes for All, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live.

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

Council response

Support is noted.

COMMENTS/OBJECTIONS

4568 - Barton - Comment

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

Council response

The comment is noted.

4576 Barton – Comment

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

Council response

It is not clear from the representation which of the objectives this relates to, but irrespective of this, this is a detailed matter that would not specifically be mentioned under any objective.

5041 Hussey – Object

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

Suggested Change

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

Council response

The RLDP seeks to balance the need to protect and enhance the natural environment with the requirement to accommodate future housing and employment needs. Whilst some greenfield sites are proposed for development, all allocations have been subject to a comprehensive site assessment process that considers environmental constraints, biodiversity interests, landscape impacts, flood risk and the availability of infrastructure. The Plan also contains policies requiring the protection and enhancement of biodiversity, the provision of green infrastructure, and measures to address and mitigate the impacts of development.

In relation to public transport, the Council recognises that access to services can be challenging for some communities, particularly for those without access to a private car. The RLDP seeks to address this by directing new development to the most sustainable locations, where there is better access to public transport, employment opportunities, services and facilities. The Plan also supports improvements to public transport, active travel and wider sustainable transport infrastructure, helping to reduce reliance on private vehicles and improve accessibility for all residents.

The Council therefore considers that the RLDP provides an appropriate framework for balancing future growth with environmental protection whilst promoting more sustainable and accessible patterns of development.

5407 - Reed – Object

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

Suggested Change

Objective 4 is meaningless

Council response

Objective 4 is ‘Placemaking’, which is a key concept at the heart of the Welsh planning system. The inclusion of a Placemaking objective is therefore fully aligned with national planning policy.

It is recognised that whilst the Council is not the provider of health facilities, the planning system has a role to play in creating healthy places and ensuring development is located in places well served by public transport. As a land use planning document, the RLDP can also allocated land for new health facilities and transport improvements.

5453 - Entwistle - Object

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

Suggested Change

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

Council response

The themes, vision and objectives have been translated into strategic policies. A monitoring framework which assesses delivery against the strategic objectives and strategic policy is set out in Appendix 3 of the RLDP. An Annual Monitoring Report will be prepared to monitor progress.

5846 - Smith – Object

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

Suggested Change

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

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

Council response

The concerns are noted. Infrastructure is a key theme throughout the strategic objectives with Objective 1 referencing that infrastructure should be resilient to future impacts arising from climate change. Objective 4 refers to the provision of accessible community infrastructure. Objective 8 relates to promoting active and sustainable travel choices and references the infrastructure required for this.

6228 - Associated British Ports – Object

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

Suggested Change

The text in Objective 9 should be amended to include reference to the Port of Barry as set out below: Promote Cardiff Airport and Bro Tathan Enterprise Zone, **the Port of Barry** and the former Aberthaw power station site, as important employment areas, enabling delivery of high-quality and skilled jobs, training, and education opportunities. Support diversification of the rural economy, enabling opportunities to provide employment and business premises within rural settlements and facilitate the growth in rural enterprises.

Council response

The Council supports the proposed change. As an employment regeneration opportunity in the RLDP, this would ensure that the Barry Docks/Port of Barry is treated in a consistent manner to the Former Aberthaw Power Station.

Proposed Change

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

Promote Cardiff Airport and Bro Tathan Enterprise Zone, **the Port of Barry** and the former Aberthaw power station site, as important employment areas, enabling delivery of high-quality and skilled jobs, training, and education opportunities.

SUSTAINABLE GROWTH STRATEGY, KEY DIAGRAM & THE SIX KEY GROWTH STRATGEY ELEMENTS

STRATEGIC GROWTH AREA

A total of 5 duly made representations were submitted in respect of Sustainable Growth Area defined as part Sustainable Growth Strategy (1 objection, 3 comments and 1 support).

The issues raised were that parts of the Vale were already over developed and placing a strain on infrastructure. In addition, sustainable growth requires supporting infrastructure e.g. bus hubs. Existing transport links are shrinking and transport connectivity in Rhoose, Llantwit Major and St Athan cannot be considered to be good with infrequent rail and bus services.

INDIVIDUAL RESPONSES

SUPPORT

4575 - Barton – Support

Traditional Architecture has to be used to encourage its widespread application here and elsewhere as a means of attracting high quality inwards investment from the private and public sectors alike.

Council response

The comment is noted.

COMMENTS/OBJECTIONS

4666 – Griffiths - Object

Certain areas are already full to bursting and growth is virtually impossible.

Council response

The RLDP Sustainable Growth Strategy identifies broad areas where new development will take place in order to achieve the Plan's Vision and Objectives. The location of new development, as identified through the housing and employment allocations within the Plan, has been informed by a range of background evidence, including access to services and facilities (including public transport), as well as the availability and capacity of existing infrastructure to support future growth.

Where additional infrastructure is required as a result of the proposed growth, this is identified within the site-specific policies of the Plan and is further detailed within the

Infrastructure Delivery Plan accompanying the Deposit RLDP (Background Paper 44A). This includes developer contributions towards sustainable transport improvements and active travel infrastructure, as well as enhancements to the strategic highway network.

4667 – Griffiths – Object

Growth can only be achieved sensibly and not half thought through. At the moment it seems too much is being crammed into an area which cannot cope.

Council response

The RLDP Sustainable Growth Strategy identifies broad areas where new development will take place in order to achieve the Plan's Vision and Objectives. The location of new development, as identified through the housing and employment allocations within the Plan, has been informed by a range of background evidence, including access to services and facilities (including public transport), as well as the availability and capacity of existing infrastructure to support future growth.

Where additional infrastructure is required as a result of the proposed growth, this is identified within the site-specific policies of the Plan and is further detailed within the Infrastructure Delivery Plan accompanying the Deposit RLDP (Background Paper 44A). This includes developer contributions towards sustainable transport improvements and active travel infrastructure, as well as enhancements to the strategic highway network.

5049 – Hussey - Comment

Sustainable growth covers a lot of ground. Can planners manage to put bus hubs, if they are going to be built in a place that is central to users. Transport links really are shrinking.

Council response

Land has been safeguarded in St Athan in the RLDP for a transport interchange, as part of Key Site HG1 KS5 and under Policy TR1.4. In addition, the RLDP makes provision for a transport interchange in Cogan.

6537 – Barry & Vale Friends of the Earth – Object

Strategic Growth Area: Focuses on settlements with good transport links to reduce car dependency.

You say this but Rhoose to St Athan fail it

- Rhoose: Key site for 339 homes north of the railway and employment development, including land east of Cardiff Airport (16.3 ha) and south of Port Road (44.75 ha).

- St Athan & Llantwit Major: Targeted for residential development, including 235 units near Eglwys Brewis Road and 105 units at St Athan Road., Clive Rd 51, Church Farm 500, west of St Athan 600

- Can't be called "good transport" without the railway – more frequent than hourly and with stations at Eglwys Brewis and St Athan. The 304 bus taking over an hour to Cardiff isn't "good". road transport is caught in snarl-ups at Weycock Cross and Culverhouse Cross.

- Single access key sites and others over 100 homes are not deliverable

Council response

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

The Council also continues to liaise with bus service providers and consideration will be given to how the bus service timetabling can integrate with any new interchange, once the scheme is sufficiently progressed.

KEY DIAGRAM

1 duly made representation was submitted in respect of the Key Diagram.

5412 – Reed – Object

The bus routes for Rhoose need checking – there is only one proper bus an hour as a bus the 905 which travels a mile is hardly a proper bus route. The active travel route is very expensive and has land ownership problems between rhoose and barry. Can it really be implemented in the plan period?

Suggested Change

Revisit the transport listed on the diagram for rhoose for transport infrastructure ensuring it is correct and deliverable.

Council response

The Key Diagram has been provided within the RLDP to visually illustrate the spatial strategy and its relationship with the strategic highway and transport network. It should not be treated as being a definitive map of transport service within the Vale of Glamorgan.

Notwithstanding this, the key diagram does already show an hourly service serving Rhoose. The 905 link between Rhoose station and Cardiff airport is also shown as a one per hour route.

The Weycock Cross to Cardiff Airport Active Travel route is considered under the responses to Policy TR1.3. A report was considered by Cabinet in July 2026 where it was approved that delegated authority be given to proceed with land negotiations, tender preparation, funding applications, procurement of required professional services and contractors and the evaluation and award of contracts necessary to deliver the project. Cabinet also endorsed the submission of external funding bids to the Regional Transport Authority to secure delivery funding for the scheme.

SUSTAINABLE GROWTH STRATEGY: ELEMENT 1 - DELIVERING A SUSTAINABLE LEVEL OF HOUSING AND EMPLOYMENT GROWTH SUPPORTED BY APPROPRIATE INFRASTRUCTURE THAT ACCORDS WITH THE VALE'S POSITION WITHIN THE CARDIFF CAPITAL REGION (CCR).

A total of 2 duly made representations were submitted in respect of Element 1 of the RLDP Sustainable Growth Strategy, (1 objection, 1 comment). The objection considered the need for an SDP to be in place before the RLDP is adopted.

STATUTORY CONSULTEE RESPONSES

6834 - National Grid Electricity Transmission - Comment

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

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

•Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations.

• Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.

• Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.

• Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.

• Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.

• Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Council response

The comments are noted. The Council will continue to engage with NGET through the development process.

INDIVIDUAL RESPONSES

COMMENTS/OBJECTIONS

5408 – Reed - Object

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

Suggested Change

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

Council response

The planning framework operates in a three-tier hierarchy where Strategic Development Plans (SDPs) sit above LDPs regionally, requiring local plans to align with and implement the higher-level regional strategy. Presently, there are no adopted SDPs in place in Wales and Local Planning Authorities (LPAs) in Wales are required to review their adopted plans every 4 years following adoption and where necessary progress with a Replacement Local Development Plan.

The Vale of Glamorgan Council formally commenced work on its Replacement Local Development Plan (RLDP) in May 2022, with the approved Delivery Agreement indicating an adoption date of late 2027. The South East Wales Corporate Joint Committee formally approved the Delivery Agreement for the Strategic Development Plan (SDP) on 31 March 2025. Final agreement was subsequently secured from the Welsh Government on 20 August 2025. This sets out the timeframe for the preparations of the SDP indicating that the SDP would be adopted December 2031/January 32.

In common with LDPs, SDPs must have full regards to National Development Framework, and as such SDPs and LDPs will be complimentary to each other and the National Development Framework set out in Future Wales 2040. The Vale of Glamorgan's position in a National Growth Area within Future Wales will need to be reflected in the SDP. Whilst the strategy for the SDP has not been defined, in order to conform with Future Wales, it is anticipated that the strategy will need to allow for growth within the Vale of Glamorgan area.

The adopted LDP expires at the end of 2026 and therefore it is important that the period without a development plan in place in the Vale is minimised. If the Council were to wait for

the SDP to be adopted in late 2031 at the earliest, this would mean a number of years without a current development plan guiding development decisions and potential pressure from speculative planning applications.

SUSTAINABLE GROWTH STRATEGY: ELEMENT 2 - ALIGNING LOCATIONS FOR NEW HOUSING, EMPLOYMENT, SERVICES AND FACILITIES TO REDUCE THE NEED TO TRAVEL

A total of 4 duly made representations were submitted in respect of Element 2 of the RLDP Sustainable Growth Strategy, (1 objection, 1 comment and 2 support). Objectors argued that the plan allocates housing in areas poorly served by bus services (e.g Rhoose) and therefore housing allocations do not adhere to this objective.

INDIVIDUAL RESPONSES

SUPPORT

6769 - Persimmon Homes (Boyer Planning)

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

Council response

Support is noted.

6902 - Persimmon Homes (Boyer Planning)

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

Council response

Support is noted.

COMMENTS/OBJECTIONS

5409 – Reed – Object

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

Council response

Rhoose is served by both a rail service providing links to Bridgend, Barry and Cardiff and a bus service (304) providing connections to Llantwit Major and Cardiff.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for

Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

5668 – Cllr Campbell – Comment

This has not been adhered to within this plan.

Council response

Rhoose is served by both a rail service providing links to Bridgend, Barry and Cardiff and a bus service (304) providing connections to Llantwit Major and Cardiff.

SUSTAINABLE GROWTH STRATEGY: ELEMENT 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.

A total of 5 duly made representations were submitted in respect of Element 3 of the RLDP Sustainable Growth Strategy, (2 objection, 3 support). Whilst there is support for this element of the strategy, concerns have been raised on the need for a cohesive transport plan with reference to Rhoose and St Athan.

INDIVIDUAL RESPONSES

SUPPORT

5699 - Cardiff Capital Region Energy

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

Council response

Support is noted.

6770 – Persimmon Homes (Boyer Planning)

The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.

Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a

more sustainable pattern of development and in doing so support growth over the emerging plan period.

Council response

Support is noted.

6903 – Barratt Redrow Homes (Boyer Planning)

The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.

Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.

Council response

Support is noted.

COMMENTS/OBJECTIONS

5045 - Hussey - Object

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

Suggested change

Make it a simple but clear document.

Council response

The RLDP is supported by a Strategic Transport Assessment. In addition, Cardiff Capital Region has published the Regional Transport Plan, which sets out the region's transport priorities and investment framework

5410 – Reed - Object

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

Suggested Change

Delete Readers ways allocation as its not sustainable and no more development should occur here until infrastructure is improved**.**

Council response

Rhoose is referred to in the supporting text, specifically in paragraph 5.18.

As identified in the Cardiff Capital Region Regional Transport Plan (RTP), the South Wales Metro includes the existing stations on the Vale of Glamorgan line, including Rhoose. Whilst St Athan does not currently have a station, the RTP references investigating opportunities for additional rail infrastructure and passenger services at St Athan and funding has been awarded to Transport for Wales (TFW) to support further feasibility work for a St Athan station**.**

A separate composite response is available for KS3 Readers Way.

SUSTAINABLE GROWTH STRATEGY: ELEMENT 4 - ALLOWING FOR SMALL SCALE AFFORDABLE HOUSING LED DEVELOPMENT IN SETTLEMENTS OUTSIDE THE STRATEGIC GROWTH AREA AT A SCALE PROPORTIONATE TO THE SIZE OF SETTLEMENT.

A total of 4 duly made representations were submitted in respect of Element 4 of the RLDP Sustainable Growth Strategy, (1 objection, 1 comment and 2 support). The strategy component has received support, but concerns have been raised about the definition of small scale and capacity of infrastructure to accommodate new development.

INDIVIDUAL RESPONSES

SUPPORT

4476 – Thomas

This should be supported and supplied as there is a clear need for local indigenous youngsters futures or inevitable migration from these minor rural settlements will continue a pace

Council response

Support is noted.

4664 – Griffiths

Support

Council response

Support is noted.

COMMENTS/OBJECTIONS

4572 – Barton - Comment

Traditional Architecture will afford the LA the ability to do many things conceived impossible previously through creating a proper settlement for everyone.

Council response

The comment is noted.

5046 – Hussey – Object

What does small scale comprise of. Will there be extra schools to cope with these challenges. Are there going to be more dentists and doctors to cope with challenges.

Suggested Change

Start from the bottom up. Solve the problems that we already have before adding to them.

Council response

The RLDP allocates four affordable housing led sites where a minimum of 50% of the dwellings must be affordable. Policy SP2 states that small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of up to 25 dwellings in Minor Rural Settlements or up to 50 dwellings in Primary Settlements. The type, scale and mix of affordable housing will be expected to reflect the latest evidence, including specialist older person housing. Proposals which do not meet the minimum 50% affordable housing provision will not be supported.

In addition, Policy HG5 Affordable Housing Exceptions Sites also allows for the delivery of affordable housing on exceptions sites on appropriate sites outside the settlement boundary, but with a distinct relationship to the settlement where there is evidence of need and where the site is proportionate to the settlement. Small scale affordable housing is defined as meaning no more than 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.

Where additional infrastructure will be required as a result of the proposed growth, this is identified within the site-specific policies of the plan and further detailed contained within the Infrastructure Delivery Plan accompanying the Deposit RLDP (Background Paper 44A).

SUSTAINABLE GROWTH STRATEGY: ELEMENT 5 - SUPPORTING THE ROLE OF CARDIFF AIRPORT AS A STRATEGIC GATEWAY FOR INTERNATIONAL CONNECTIVITY

A total of 6 duly made representations were submitted in respect of Element 4 of the RLDP Sustainable Growth Strategy, (1 Objection, 2 comments and 3 support). The issues raised include an objection to the inclusion of Model Farm and support for promoting Cardiff Airport and St Athan as enterprise zones these areas are underutilised. However, comments have been made that major improvements in highways and transport links are required.

INDIVIDUAL RESPONSES

SUPPORT

4573 – Barton

Excellent but integrate Traditional Architecture longer term to blend this setting in to the area.

Council response

Support is noted**.**

4665 – Griffiths

Support

Council response

Support is noted**.**

5466 - Entwistle

Cardiff Airport is under utilised. The council needs to support increased services from Cardiff Airport. Public transport links to the airport are inadequate at present. While I support the idea of an enterprise zone and business developments at St Athan for example are positive I fear without major improvements in roading and transport links development of new enterprise areas will be in vain. Road links from the Vale to the M4 need to be considerably improved in order to attract major industry and business to the area first. This should be prioritised before the enterprise zones are developed.

Council response

Support is noted. The concerns in respect of the road infrastructure are acknowledged.

COMMENTS/OBJECTIONS

5047 – Hussey - Object

Why is model farm being targeted again. It has been a part of Barry and much loved. It has tenanted by the same family for very many years. A piece of Barry's history that should be protected. Not destroyed

Suggested change

Please rethink the destruction that will be caused to our environment if we keep letting housing developers buying of green field sites keep them for years. They can afford to wait and keep submitting planning applications. These companies don't consider green fields as anything precious.

Council response

Model Farm has been rolled forward from the current adopted LDP as a strategic employment allocation. The site is presently subject to an appeal for non-determination with Planning and Environment Decisions Wales (PEDW) for an outline planning application for a B1, B2, B8 Business Park on the southern site (Model Farm). Consideration will need to be given to the outcome of the planning appeal when a decision has been made by PEDW.

6187 – Vincent – Comment

The development of Cardiff airport is reasonable for the local economy. But Planning seems to be systemically blind. They are clearly not engaged in joined-up thinking. If the laudable aim is to develop Cardiff Airport and there is a major artery road connecting the airport to Cardiff and the M4, that is Port Road, going immediately past the KS1 site, would be it rational behavior to introduce another 700+ cars (from the KS1 site) disgorging immediately at the "pinch-point" of the Weycock Cross roundabout? Do the planners really imagine this will help future airport development?

Council response

The RLDP is supported by a Strategic Transport Assessment which considers the cumulative impact of development, including housing allocation KS1 Land at North West Barry, on the strategic highways network and identifies a mitigation scheme to address the impact of this development. This is discussed in detail in the responses to KS1 and TR1 Transport Proposals.

6447 – Jenkins- Comment

The RLDP's support for increased activity at Cardiff Airport further undermines its environmental and sustainability claims. The plan fails to acknowledge the significant negative impacts that increased aviation activity will have on nearby communities, including

St Athan, Flemingston and Eglwys Brewys. More flights and airport-related traffic will increase noise pollution, carbon emissions, and congestion on the A4226, B4265 and surrounding rural roads. The RLDP offers no credible mitigation strategy for these impacts.

Council response

Cardiff Airport is recognised in Future Wales as an 'essential part of Wales' strategic transport infrastructure' and in order to accord with national policy, the RLDP must reflect its status.

Paragraph 5.30 of the Deposit RLDP states "it is recognised that there is a tension between the RLDP's climate change objective and the intention to support Cardiff Airport, given that aviation emissions are a significant global contributor to climate change. This challenge is recognised in Llwybr Newydd – the Wales Transport Strategy. However, the availability of a local airport does allow South Wales based passengers the opportunity to fly from closer to home, reducing journeys for those that may have otherwise been made to airports outside of Wales. The Welsh Government is working with the UK Government and the Jet Zero initiative to reduce the environmental impacts of aviation."

SUSTAINABLE GROWTH STRATEGY: ELEMENT 6 - ALLOWING FOR REGENERATION OPPORTUNITIES ON PREVIOUSLY DEVELOPED AND UNDERUTILISED LAND, INCLUDING AT ABERTHAW AND BARRY DOCKS

A total of 6 duly made representations were submitted in respect of Element 6 of the RLDP Sustainable Growth Strategy, which included support for this objective. Comments were made in respect of rewording the section on Barry Docks to reflects updates to the Masterplanning process.

INDIVIDUAL RESPONSES

SUPPORT

4574 – Barton

Support on the condition that Traditional Architecture is duly supported.

Council response

Support is noted. Both the sites at Aberthaw and Barry Docks are at early masterplanning stages and therefore details on the design are not currently available. It is not considered appropriate to provide detail

5048 – Hussey

How encouraging to read about aberthaw power station. That is something to be proud of. Not a lot else is.

Council response

Support is noted.

5467 – Entwistle

This is a move in a good direction but the council needs to make these areas more attractive to outside businesses and industry. At present the roading network is in poor condition in these areas and results in HGV's travelling along unsuitable, overcrowded and urban routes to access these areas. Transport links between these areas and the M4 need to be considerably improved before repurposing of these sites in order to attract high quality businesses and employers into the area once the sites are ready.

Council response

Support is noted. The concerns in respect of the road infrastructure are acknowledged. Consideration will be given to the capacity of the highways network to accommodate

additional traffic, including HGV traffic if relevant, will be given at planning application stage, when the detailed after uses for these sites are known.

5701 – Cardiff Capital Region Energy

CCR Energy welcomes the RLDP Sustainable Growth Strategy's focus on regeneration of previously developed and under-utilised land, including the former Aberthaw Power Station. Safeguarding the site as a Green Energy Park presents a unique opportunity to deliver renewable and low-carbon energy projects, battery storage, a zero-carbon manufacturing cluster, and a green energy innovation centre. Complemented by a biodiverse ecology park and visitor amenities, the proposals will create highly skilled jobs, support industrial decarbonisation, and contribute significantly to climate change mitigation. The strategy and forthcoming Masterplan provide a strong framework to enable the successful regeneration of this strategically important site.

Council response

Support is noted.

6804 – Minerals Products Association

We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.

Council response

Support is noted.

COMMENT/OBJECTION

6231 – Associated British Ports - Comment

ABP supports the general approach of this strategy, but advises that amendments should be made to the supporting text.

The Masterplan that was prepared and is referenced within this Deposit RLDP included land that is no longer to be brought forward for development by ABP. As a result, ABP will be preparing a new Masterplan that more accurately reflects the current position and the future aspirations for the Port.

The masterplanning exercise will be subject to a rigorous process and it is likely that the ambitions for the Port will be similar to those identified in the previous Masterplan, including the redevelopment of the Black Rocks Site and the promotion of the Clean Growth Hub. ABP will also continue to commit to investment in the Port facilities.

As delivered on other ABP land holdings across the UK, there is potential at the Port of Barry to create new renewable energy hubs, solar, green hydrogen production and carbon capture and storage (CCS) facilities. The reference to the suitability of green energy generation should be included.

In order to reflect the potential and opportunities at Barry more accurately, ABP proposes that paragraph 5.35 is amended to read as shown below:

5.35 In addition, Associated British Ports (ABP) will be masterplanning the Port which identifies future redevelopment opportunities on land within their ownership. This may include:

• Investment in Port infrastructure.

• Redevelopment of Black Rocks Growth Zone for potential uses such as battery supply chain, advanced manufacturing, rare earth mineral processing, next generation biofuel manufacturing, and other green energy generation and Port-related opportunities.

• The Port Clean Growth Hub focusing on zero carbon operations and manufacturing.

Suggested Change

Amendments to paragraph 5.35 are requested to update information on the ABP Masterplan

Council Response

The Council notes that the previous masterplan prepared by ABP is being updated. In order to ensure factual accuracy, the Council proposes to include the changes suggested by ABP.

Proposed Change

Paragraph 5.35 should be amended as follows:

5.35 In addition, Associated British Ports (ABP) ~~have prepared a Masterplan~~ **will be masterplanning the Port** which identifies future redevelopment opportunities on land within their ownership. This **may** include ~~includes~~:

• ~~Upgrading in Landy Windsor Lock and installation of new lock gates to meet the needs of all vessels using the Dock~~ **Investment in Port infrastructure**.

• Redevelopment of Black Rocks Growth Zone for **potential** uses such as battery supply chain, advanced manufacturing, rare earth mineral processing, ~~and~~ next generation biofuel manufacturing, **and other green energy generation and Port-related opportunities**.

• The Port Clean Growth Hub focusing on zero carbon **operations and** manufacturing.

CONSULTATION PROCESS

Representation ID	Respondent Name	Representation Type
4848	Ian C Davies [2987]	Object
5052	Mr Shayne Wilford [2132]	Object
5074	Mr Stephen Vaughan [3060]	Object
5164	Miss Miranda Davis [3131]	Object
5215	Mr Darryn Cross [2549]	Object
5224	Miss Rachel Ward [3108]	Object
5309	Professor Andrew Vincent [920]	Object
5543	Mrs Mary Vincent [2657]	Object
5550	Professor Andrew Vincent [920]	Object
5630	Mrs Katie West [3321]	Object
5696	Mrs Mary Vincent [2657]	Object
5758	Mr Phillip Davies [3354]	Object
5773	Mrs Sarah Jane Davies [3362]	Object
5877	Mrs Rebekah Vincent-Newson [2668]	Object
5923	Emma Reed [2653]	Object
5944	Mr Ross Cleland [3430]	Object
5978	Mrs Debra Cleland [2639]	Object
6106	Miss Julia Thompson [2631]	Object
6286	Ms Lynne Squires [3520]	Object
6321	Mr Ioseff Davies [3528]	Object
6363	Mr Steve Thorne [697]	Object
6501	Vicky Jewell [3610]	Object
6507	Vale of Glamorgan Council Conservative Group [3614]	Object
6512	Mrs Mary Vincent [2657]	Object
6514	Mr Jason Vincent-Newson [3418]	Object
6518	Professor Andrew Vincent [920]	Object
6536	MS Andrew R T Davies [1324]	Object
6551	Daisy Williams [3632]	Object
6563	Miss Julia Thompson [2631]	Object
6597	Mr David Barton [2683]	Comment
6735	Ms Sarah Forster [2046]	Comment
6764	Mrs Mary Vincent [2657]	Object
6887	Mrs Kay Shaw [2243]	Object
6947	Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]	Comment
7027	Mrs susan edwards [3222]	Object
7217	Professor Andrew Vincent [920]	Object

A total of 36 representations were made by 29 individual respondents in respect of the consultation process. The key issues raised were that the RLDP consultation process was overly complex, heavily digital, difficult to navigate, insufficiently publicised, and provided too little time for meaningful public participation. Many respondents believe these issues reduced accessibility, excluded sections of the community, and undermined confidence that public views genuinely influenced the plan.

The individual representations are summarised below. Due to the common themes being identified by representors, a composite response which addresses the issues raised as been provided.

COMMENTS AND OBJECTIONS

4848 – I Davies - Object

Reading the Overview and Timescale I am prompted to make the following comments.

1. The Adoption of the RLDP is set for September 2027. The Plan cannot therefore represent the period 2021 to 2036.

2. I find it difficult to comprehend that this Plan will be relevant for only 9 years after which the tax payers of The Vale will have to fund another RLDP. This can hardly be called planning.

3. It beggars belief that the RLDP is helping to ‘’decide what developments will and will not be permitted at different locations and highlight areas that we need to protect.’’ What on earth does the current LDP do if it does not decide what developments will and will not be permitted at different locations and highlight areas that we need to protect? Will those development applications which are currently pending, for one reason or another, now be delayed beyond September 2027?

5052 – Wilford - Object

It is very very difficult for us, to navigate and comment on potentially 1000's pages of information with only 100 words per paragraph. We will persevere but, using this as an example, we are unclear of what we're commenting on. The paragraph above I assume? The process also assumes access and knowledge of computers an online representation. Older and more vulnerable residents will not have the opportunity to comment this way and will likely therefore to be not represented. This is the first comment box and it's already confusing. The Authority needs to reconsider how it presents this information, making it less confusing and accessible to all, including those without access to online portals etc.

5074 – Vaughan - Object

Despite living in close proximity to a development site, I had to hear by word of mouth. This is not acceptable. I believe they should tell not only all residents in Barry, but all residents in the Vale. Telling only the homes that are adjacent to the field is not good enough. The other issue I tried to utilise the web site to put my objections across and I found that the information was bloated out with rubbish and too little facts. This was done to put people of reading. We need information backed up with fact not data and bloat. When responding we are restricted to very few words, so we have no option but to be concise (One rule for one,

another for others). The web site is off putting (maybe deliberately so). I did put my objection, but not convinced it worked at all.

5164 – Davis Object

On the public consultation: - As Rhoose, St. Athan and Dinas Powys are the affected settlements, the documentation should have been made available in their community run libraries. The council officers present at the public consultation meetings were not well enough briefed to answer the questions raised and could therefore only serve as a sounding board for the frustrations expressed.

5215 – Cross - Object

No where near enough time to read through all these documents and this process to object has seemingly been made very difficult and confusing for people who want to object

5224 – Ward - Object

Trying to make a representation is actually quite difficult. There really should be a big button which makes it obvious where you can submit your views. I spent 10 minutes clicking in circles until I realised what to do and I'm pretty proficient with tech. Additionally, the number of documents and associated index's is quite off putting. It feels like the council are purposefully putting barriers in the way of people wanting to object. I understand the necessity for transparency but there should be a layman's version for normal people to be able to read through in a reasonable timeframe. I estimate it would take a full day to read every word of the associated documents and I know I don't have that sort of time.

5309 – A Vincent - Object

First, the overall online presentation of the RLDP is utterly chaotic, confusing and way overlong. There is NO clear organization of the material and there are multiple cross-cutting documents making it painful to navigate. Documentary material for the KS1 site, for example, appears in multiple locations, needing the reader to consult other areas of the byzantine site to give meaningful responses. It looks overall like a mass dump of documents, with no regard for readership. Second, it takes NO regard whatever for digital poverty, it is thus discriminatory and offends basic principles of natural justice and fairness.

5543 – M Vincent - Object

It would seem that decisions were being taken on the use of sites well before affected residents were even aware of them. The first I heard of the proposed rehash of the development at Weycock Cross (refused in 2015) was in July 2025, when we were invited to a consultation at Millwood Bowling Club. This was more of a show-and-tell than a consultation. No one took down our comments. Didn't they count? The next we heard was

that there would be a vote in December to decide whether the NW Barry site should be removed or included. Some members of my family attended and were give three minutes to state their objections. I watched online and say how these objections were summarily dismissed by a planning officer. Then came the vote. Neck and neck, but passed through. Key councillors did not vote. Next was a 'consultation on the RDLP' in Memorial Hall, Barry. Here we were informed of how we could 'have our say' on the proposed developments, by stating our responses to the proposals through an online portal, which would have reports of all the detailed investigations into viability and suitability of their 'mitigation packages' to offset the objections. These would be found in the supporting documents. In order for our responses to be valid, they had to reference these documents. These turned out to be vast in number, packed with confusing and often contradictory details. This was the detail we were told we had to reply to. This process was grossly unfair in that the majority of residents would not have the digital skills to navigate the way through them. This is neither fair nor transparent. Those that were better able to trawl through the huge megabites of scattered and hidden graphs and reports found that the evidence was very thin and far from trustworthy, with many inner contradictions, inaccuracies and false conclusions. From this unreliable and unscientific data 'evidence' had been extrapolated and decisions made. This is neither transparent nor honest. It is not democratic consultation.

5550 – A Vincent - Object

The initial consultation, which focused on higher level strategy, was singularly limited. The large majority of residents in NW Barry were not even aware of any developments. Subsequently, we understand that some who knew of the consultation did register objections. These objections seemed to have been ignored and a "Preferred Strategy" was endorsed by full Counsel. As far as we can ascertain, ex post facto, there were no site specific technical assessments available. Initial consultation occurred before key technical evidence was available on the sites. In relation to NW Barry, residents were told (in reply to questions) in June/July 2025 to "wait" for details (in a public meeting in Millwood Bowls club). This was the first occasion that we had heard of developments. Vale Planning and Council appear to have made final decisions about sites after this, however the public were not consulted at all. Barry is clearly expected to take substantial growth, but there is no record of targeted community engagement specific to Barry. Heavy reliance was placed on written representations. There was no evidence of community or stakeholder workshops and no co-design sessions. When we attended the in-person consultation event in Barry Memorial Hall in February 2026, there was no one to record our comments, no answers were given any queries and we were constantly told to go and look at the online consultation portal to get information and submit our concerns. The in-person event was simply a "signposting portal" to the online RLDP. There was no meaningful engagement. The public were simply asked to react to a pre-determined sites. Planning's subsequent behaviour has largely been negative and reactive to any suggested changes.

5630 – West - Object

Unnecessary.

5696 – Vincent - Object

'The local community are involved in the development of proposals... Proposals are shaped to help to meet these needs as well as create, integrate, protect and/or enhance a sense of community and promote equality. These engagement sessions are considered to assist in fulfilling this Charter' My experience of these 'engagements' does not match the stated aims. I felt far from 'equal', more an irritation in the way of the council's justification of its intentions. The sheer difficulty of navigating this labyrinthine 'consultation' has felt like abuse. No council should treat its residents this way.

5758 –P Davies - Object

Website very hard to access

No Welsh language option for Welsh speakers

5773 – S Davies - Object

Website very hard to access

No Welsh language option for Welsh speakers

5877 – R Vincent-Newson - Object

In broad terms, the consultation process surrounding the proposed developments raises significant concerns about accessibility and fairness. The consultation feedback form was difficult to locate and use, being hidden via multiple web pages rather than clearly signposted. The consultation portal itself was poorly designed, being overly complicated and unnecessarily layered. The sheer volume of documentation across the site created unnecessary obstacles for residents who wanted to take part. Under the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, planning authorities have a clear duty to ensure that consultation arrangements are accessible and enable meaningful engagement from the community.

Planning Policy Wales sets out firm expectations that public participation must be transparent, inclusive, and straightforward, ensuring that all individuals are able to contribute to the planning process without undue difficulty.

When consultation tools are poorly designed, or overly complicated or burdensome, as they were in this consultation, this calls into question the credibility and legitimacy of the consultation exercise.

- Consultation limited to the Preferred Strategy stage (not site-specific consultation) - Residents were not consulted on the detailed implications of individual sites (e.g., infrastructure capacity, environmental constraints, transport, drainage), limiting the ability of the public to make informed representations early in the process.
- No evidence of direct engagement with affected landowners or communities for the largest site - The Council relied on promoters' claims rather than conducting independent landowner engagement or reviewing deliverability before public consultation. As a result, the public were consulted on a strategic option that was later abandoned.
- Preferred Strategy proceeded despite strong objections and unresolved issues - There is no evidence that objections were meaningfully incorporated before endorsing the Strategy. This suggests the consultation informed the Council but did not shape the outcome.
- Lack of site-specific technical assessments available at early consultation stage and at this later stage - The public were expected to comment without access to essential technical information, undermining the quality of feedback and the transparency of the process. This is still the case now, whereby after reading as much of the key information as possible, there are still huge gaps in basic information that help residents make an informed decision.
- Consultation did not explore alternative growth locations until later - The public were not consulted on alternative or fallback options, limiting their ability to compare spatial choices or suggest more acceptable solutions.
- Evidence of restricted consultation scope for the Barry community - No tailored engagement with Barry residents or community groups was undertaken, despite the disproportionate scale of proposed development for Barry.
- Limited clarity on how comments influenced later site selection - A lack of transparency exists regarding how community feedback shaped decisions. Changes to the strategy arose from landownership/deliverability - not from public concerns.
- Heavy reliance on written representations - The in-person event was simply a 'signposting to the consultation portal' event. It was not meaningful engagement and cannot legitimately be called a consultation event. This method excludes those less able to engage (hard to reach groups) through formal written consultation, reducing representativeness.
- No community engagement prior to selecting the original five "key sites" - The public were not involved in early spatial option development; instead, they were asked to react to a pre-determined set of locations.
- Reactive, not proactive, approach to community concerns - Public sentiment had little demonstrable impact on spatial strategy development.

The consultation was not inclusive, was discriminatory and fundamentally flawed.

5923 – Reed - Object

Only the Council run libraries received copies of the deposit plan documents and not the community libraries where most of the allocated development sites are - ie Rhoose Dinas Powys and St Athan. Only one short session to discuss with officers the plans was held and

the plan for Rhoose was wrong misleading the public into the likely way the development would proceed. A further session with officers was asked for but was refused. The Plan is overcomplicated and not all sections in the plan can be commented on with word restrictions on each Policy.

5944 – Cleland - Object

Key Documents Unavailable in Welsh Online

5978 – Cleland - Object

Some of the important documents on the website are only in English.

6106 – Thompson - Object

The sheer volume and inaccessibility of information held on the web pages in relation to this "consultation" makes the consultation period unsuitable and does not allow residents time for review let alone be able to provide a robust case for consideration.

Suggested change

Either a further consultation or extended consultation period to allow for thorough review of all documents.

6286 – Squires - Object

In my view, the RLDP is not fully justified or effective in its current form with respect to plan-making and the evidence base. Key gaps include accessibility and transparency of evidence, consideration of resident and stakeholder feedback, and robust monitoring and review arrangements.

Without clear and accessible evidence, demonstrated consideration of local feedback, and robust monitoring and review mechanisms, residents cannot be confident that the Plan will be fair, effective, or responsive to changing circumstances.

Clarity, Transparency, and Accessibility of Evidence
The RLDP is not always clear and is not easy to access.
Technical reports, data, and assumptions are often difficult to find or understand, making it hard for residents to see why particular sites or policies were chosen.
The Council should provide accessible summaries and clear explanations so that everyone can understand and comment on the evidence.

Local Consultation and Consideration of Resident Feedback
I am concerned that residents' views may not have been fully taken into account in shaping

the Plan. It is unclear how consultation responses have influenced allocation decisions or policy wording.
I seek assurance that feedback from local people and community groups has genuinely informed the Plan, and that future consultations will be inclusive and clearly reported.

6321 – I Davies - Object

The digital approach adopted in this consultation is likely to have excluded many people in the local community from participating and responding, thus providing an inadequate consultation. Indeed, completion of pdf forms and subsequently hunting down the correct e-mail address to return the form was a laborious process. I was unable to access the online form method.

6363 – Thorne - Object

I am also aware that the consultation period is not in accordance with regulations regarding "due consideration" and is based on the timing of forthcoming Senedd elections in May. It has become more of a political issue as opposed to that of logic and common sense.

6501 – Jewell - Object

1. The consultation form and accompanying literature/reports is excessively lengthy, making it difficult for many individuals, especially those with health challenges and older adults, to engage effectively. This renders the consultation process inequitable.

2. While I agree that personal details of those commenting should be shared with relevant Council members, these should not be made public, I question the legality of this. The current policy discourages participation due to fears of backlash, undermining fairness.

3. Neither I nor several other residents were informed about the public consultation event at Barry Memo Arts Centre on Monday, 2nd February, which is unfair.

6507 – Vale of Glamorgan Council Conservative Group - Object

Our Group has been approached by residents from across the Vale of Glamorgan expressing deep concerns regarding the consultation process. Many have found the consultation portal difficult to navigate, and relevant information hard to locate. Given the time required to read all the relevant documents prior to crafting a response, residents do not feel the six-week consultation process is sufficient. As a Group, we agree. For this reason, at Full Council on Monday, I requested extension to the consultation period. It is regrettable this was not granted. As such, it is the view of our Group that the consultation is flawed. We therefore believe that it must be carried out again.

Suggested change

Carry out the consultation again for a longer period.

6512 – M Vincent - Object

I have found the fractured and piecemeal format of the online RLDP to be confused and confusing. It has necessitated endless repetition, and I was constantly forgetting where I was and what I had already said. In consequence, I am writing here an overall narrative to pull it all together.

My objections begin with a critique of the lack of transparency, accessibility and ease of engagement within the consultation process. The difficulty in navigating the scattered information restricts many residents' ability to engage meaningfully. Such a barrier is against the stipulations of Planning Policy Wales for enabling inclusive consultation. The too-narrow time frame for such a mammoth undertaking has also proved an additional unacceptable barrier.

6514 – J Vincent-Newson - Object

Planning consultations are legally required to be accessible. A specific, quantifiable overview provides clear evidence that the consultation process as it is currently being facilitated fails at this first requirement as it is totally unrealistic to expect the public to have any meaningful opportunity to read and review the supporting documentation in the time available that is critical to the entire consultation process.

These failings can be summarized as follows:

- The volume of material is prohibitively large.
- The site provides no summaries, no filtering, and no guidance on which documents matter most.
- The time required to read everything is incompatible with the consultation deadline.
- This raises legitimate concerns about accessibility, fairness, and procedural transparency.

Concerns regarding website design, structure and implementation:

1. The consultation website is extremely poorly constructed, making it difficult for users, particularly those less digitally experienced, to find where and how to provide feedback.
2. The website makes no attempt to curate, organise or structure the supporting documentation in a manner that eases the burden on the user caused by the excessive volume. For instance, it is impossible to follow any logical path or structure to locate, read and review supporting documents pertaining to a single development. For this reason, it is necessary to wade through the full reams of PDF documents as outlined above simply in order to locate any sections relevant to a particular proposed development.

3. Many, but not all of the PDF documents are available in both Welsh and English, however, several of the key supporting documents (flood assessment, candidate site assessment, etc) are only available in English.
4. In addition to the single downloadable consultation feedback form there are multiple areas of the website where it is possible to provide feedback comments, however these are typically limited to 100 words, and the ability to provide comments in this way is scattered and unstructured (comments are available for some documents, but not others, with no way of knowing whether any comment-able documents have been missed).

   Likewise, it is totally unclear whether those online comment boxes are meant to be taken in addition to, or instead of, the single downloadable feedback form. This simply adds to the overwhelming feeling of the user not knowing whether they have been able to provide the necessary feedback as part of the consultation process, and this simply reinforces the sense of exclusion and alienation from the whole consultation process.

5. Finally, in order to generate an impartial summary of the website's suitability as a legal platform for the RLDP consultation process, I used Microsoft's Copilot AI tool to perform a quick scan and summary of the website.

Suggested change

On the basis of the concerns outlined in the attached document, I would request that the consultation period be extended by a period of at least 2 months to provide any chance of the public being able to engage in the process in a fair and democratic way.

6518 – A Vincent - Object

Major concern in the manner in which the whole RLDP has been presented to the public and the compressed time period in which to read, digest and comment.

Vale Planning have already recently replied to a number of residents on the above timing question, namely, that they (Vale Planning) were only fulfilling a statutory requirement of six weeks. This response misses the point. The statutory consultation period is not the issue for residents. The core issue is rather the clumsy, overlong and ill-organised character of the whole RLDP, which eats up time. Vale Planning have a public duty of care for local residents, namely, to minimally help and facilitate public understandings of the issues. Sadly they entirely failed in this basic responsibility. Intentionally or not Vale Planning quite literally dumped thousands of pages of technical documents on the website with little or no guidance or clear pathways for ordinary readers, which is an unforgivable administrative lapse.

Vale Planning have argued that they do provide short executive summaries for documents. However this argument cuts no ice. Most of the executive summaries give no clear

indication as to whether there are any substantive details about a relevant site for the reader. Therefore one can only ascertain whether a particular site is being addressed by trawling hundreds of pages of dense technical text. Consequently, the arguments that residents should either only read and comment on their own site, or that they should only read executive summaries, is spurious. Multiple PDFs in the RLDP on, for example, traffic, drainage, the environment (dropped in at random throughout the whole RLDP website), will often contain more detailed micro-policy comments on a relevant site. However, such micro-policy comments are literally submerged deep within hundreds of pages of dense text. The overall effect of this kaleidoscopic website is thus continual bafflement.

Like many residents I attended the walk-in sessions with Planning; however the only advice we were given by Planning operatives when we raised critical queries was that we had to consult the details of the online website. Notably this was also the same case for any paper-based responses. The supposed online evidence documents had to be addressed. The website has therefore been the evasive linchpin of this whole debacle. This makes the whole consultation process largely inaccessible to ordinary folk and those who have limited digital skills or limited time due to responsibilities. In point, for those with limited digital skills, the online RLDP offends against basal principles of natural justice. It is intrinsically discriminatory. This is simply not democratic consultation.

It is worth noting here, in passing, the factual nature of this timing issue. In running a Microsoft Copilot AI full analysis of the current RLDP, in terms of basic reading time, evaluation and assessment of the document. Copilot concluded that:

"It would take a single reviewer approximately 1,103 hours (roughly 27.5 weeks of full-time work) to complete this task". This would be reading every day, all day, for 27 weeks. Bizarrely, Vale planning and Council appear to see no problem here whatsoever.

6536 – A RT Davies MS - Object

I express deep concern that the public have been unable to easily access material owing to the ways it has been published. The average person has not been able to adequately consider all of the information within the consultation period. As such the public need more time to produce their consultation responses and at the very least, the consultation period must be extended.

Suggested change

The consultation period must be extended.

6551 – Williams - Object

The consultation process for this proposed development raises serious concerns regarding accessibility and fairness. The objection form provided for public responses is difficult to access and not user-friendly, which creates a barrier for residents wishing to participate in the consultation. Under Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, planning authorities must ensure that consultation procedures are accessible and allow meaningful public participation. Additionally, the principles of public participation set out within Planning Policy Wales require planning authorities to provide clear, transparent, and inclusive consultation opportunities so that all members of the community can engage with the planning process.

Where consultation mechanisms are difficult to locate, inaccessible, or overly complex to use, this restricts the ability of residents to submit representations and undermines the legitimacy of the consultation process. Public consultation must be conducted in a manner that is fair, transparent, and genuinely accessible to the community affected by the proposed development. If residents face barriers when attempting to submit objections or feedback, the consultation cannot be considered fully compliant with the principles of meaningful public engagement required in the planning process.

6563 – Thompson - Object

The sheer volume of documents to understand on the web pages has made it very difficult for average locals to understand fully.

6597 – Barton - Comment

LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.

6735 – Forster - Comment

It is crucial that this stage and future processes and decisions are not rushed, that matters are given full and proper consideration.

There has been insufficient time for decision makers and the public to review the information and evidence which is overwhelming.

Minutes/recordings of previous council meetings suggest that councillors were required to reach decisions swiftly and without the opportunity to properly consider the documents/evidence and that the RLDP was rushed through to public consultation in spite of valid concerns raised by councillors and pleas for sufficient time to consider the evidence.

See example the minutes of the place scrutiny committee extraordinary hybrid meeting on 6th January 2026 and the recording of that meeting where Councillors raised concerns regarding the volume of papers (900+ pages).

The public has similarly been placed under acute pressure to navigate and digest the information presented, prepare and submit representations. The community has been placed under undue pressure and community engagement has been poor. The onus has been left on the community to engage and muddle through the information. Drop in sessions have not provided answers to the deep concerns of residents relating, inter alia, to traffic congestion and flooding.

Circa 7/8 months? Has been allocated to consider the representations in preparation for Stage 4 submission – which is disproportionate to the time afforded to this consultation.

Many in the community have said that this is a 'done deal' why, by so many people and so often? And 'don't bother wasting your energy (making representations) it won't make any difference'.

Future processes, evidence gathering and decision making must be genuinely independent, avoid any potential for conflicts of interest and ensure that issues and gaps in evidence are properly and fully addressed in good time – decisions should not be rushed through. If Eastbrook remains in the Deposit RLDP at Stage 4, Welsh Government and the Planning Inspectorate must ensure that the Independent Examination process into the soundness pf the plan and compliance with statutory requirements is dealt with by highly experienced and wholly independent individuals/organisations with the skills and confidence to reach the correct and independent conclusions.

Suggested change

Has it not been possible / deemed appropriate to extend the statutory 6-week consultation period? Would it not be appropriate to repeat it? 6 weeks has been insufficient for this consultation.

6764 – M Vincent - Object

Others within our group, with far better digital skills than I have tell me that the data they offer is flawed and often self contradictory. And it is here, that the real nub of our complaints becomes apparent. The quantity, complexity, inaccessibility and sheer chaotic organisation

of the online consultation process makes it well-nigh impossible for the average resident to navigate and respond to. We struggle to 'read' or understand the thousands of pages of graphs and text. It is dispiriting and the cause of significant distress. In truth it is an information dump rather than a consultation. This makes a mockery of democracy and fairness.

6887 – Shaw - Object

Why have the Vale Council made the form online so hard to navigate and fill in out objections to the proposed build up in Eastbrook. I believe it was deliberate so that many people give up.

I believe that the independent examination will be carried out by PEDW.

6947 – Penarth Town Council - Comment

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

7027 – Edwards - Object

I have had great difficulty in downloading the forms from your website which is extremely complicated and not user friendly.

7217 – A Vincent - Object

Vale Planning in fact have a public duty of care for local residents, namely, to minimally help and facilitate public understandings of the issues. Sadly, they entirely failed in this basic responsibility. Intentionally or not Vale Planning quite literally dumped thousands of pages of overly technical documents on the website with little or no regard, guidance or clear pathways for ordinary readers, which is an unforgivable administrative lapse. This makes the whole consultation process largely inaccessible to ordinary folk and those who have limited digital skills or limited time due to responsibilities. In point, for those with limited digital skills, the online RLDP offends against basic principles of natural justice. It is intrinsically discriminatory against those who found it impossible to navigate.

COMPOSITE RESPONSE

The Council would advise that the RLDP has been prepared in accordance with the requirements of the Development Plans Manual (Edition 3) (March 2020) (DPM) which reflects the context of current national policy as contained with Planning Policy Wales (Edition 12) (February 2024) and current legislation including the Planning and Compulsory Purchase Act 2004, the Planning (Wales) Act 2015 and associated Regulations (The Town and

Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)) and statutory consultation requirements.

All Local Authorities in Wales are required to produce a Local Development Plan (LDP) to manage land and development over the long term, setting out a positive vision for the area, and identifies where and how development should take place in the future. The existing Vale of Glamorgan LDP which was adopted in June 2017 currently administers this role and covers the period 2011-2026. Following the adoption of the LDP, the Council is required to annually monitor the performance of the plan, and after 4 years undertake a review of the plan to consider whether there is a need to update or replace its LDP. A review of the adopted LDP was undertaken in June 2021, which concluded that because of changes to national planning and the Council's new ambitions and aspirations, such as addressing climate change it was deemed necessary to produce a Replacement LDP (RLDP). Although work on the RLDP formally commenced in May 2022, the review was undertaken in June 2021 and therefore the Plan period extends from 2021 to 2036 to account for the plan preparation process.

Any planning applications submitted during the current Plan period will continue to be assessed against the Adopted LDP until such time as the LDP expires.

The Council recognises that a substantial amount of information was published as part of the consultation. However, this was necessary to ensure that the RLDP is supported by a robust and transparent evidence base that clearly demonstrates how decisions have been reached. As the RLDP will form the framework against which future planning applications are determined, a significant level of supporting evidence is required to satisfy the tests of soundness and national policy requirements. To assist users, supporting documents were organised into clearly defined categories, including background papers, evidence base documents and site-specific supporting information. Most supporting documents also included executive summaries to explain their purpose and key findings.

The preparation of a RLDP requires a comprehensive and technical evidence base, much of which is mandated by national policy and guidance. This evidence base includes technical evidence and site assessments which illustrate that proposed development sites are appropriate and can be delivered within the timescales of the plan and in accordance with local and national policy. While it is regrettable that these documents are technical, every effort is made to ensure that non-technical summaries are available. As these documents are necessary to support the inclusion of sites within the RLDP, their technical nature is therefore necessary.

Therefore, while the comments are noted, the Council considers that the technical nature of the evidence base is proportionate and necessary and does not deter public engagement.

Whilst the evidence base was extensive, respondents were not required to review every supporting document to submit comments on the Plan. Representations did not need to

reference specific evidence base documents to be considered valid. It is recognised that in some instances, key sites were referenced in background papers as well as under the site-specific supporting information such as the Strategic Transport Assessment. However, where clarification was required, Planning Policy officers were available throughout the consultation period to direct individuals to relevant information and answer questions regarding any content in the Deposit RLDP or consultation process itself.

The Council also published an Easy Read version of the Deposit Plan, and a full version of the Deposit Plan was made available in Welsh. For supporting documents prepared by the Council, Welsh-language versions of the executive summaries were also provided. Documents produced by external organisations or submitted by third parties as supporting information for proposed site allocations, were not translated, as they were not prepared by the Council and were published in their original form.

Throughout the consultation period, support was available from the Planning Policy Team by telephone and email as well as consultation events to assist individuals with submitting representations or understanding the consultation material. In addition, officers undertook engagement activities with a range of groups, including those traditionally considered harder to reach, such as the 50+ Forum and tenant engagement groups. These sessions included explanations of the consultation process and assistance with making formal comments where required.

The Council sought to provide a variety of methods through which representations could be made. Comments could be submitted via the online consultation portal, by email, in paper form or by post. A user guide explaining how to use the consultation portal was made available. For those who preferred not to use the online system, paper representation forms could be downloaded, requested from the Council, obtained at consultation events, or collected from the Civic Offices or local Council run libraries. The online portal did not restrict the overall length of submissions, although users were requested to provide a short summary where representations exceeded 100 words to assist with processing and reporting.

While the comments regarding the Council's digital consultation portal 'OPUS' are noted, the Council considers that such digital mechanisms for public consultation are now regarded as standard practise as evidenced by the use of the portal by many local authorities across England and Wales. The Council considers that the use of the digital system as the primary mechanism for engagement, reflects modern practises and enables wide access as is evidenced by the level of response received to all stages of public consultation in the RLDP process.

In addition, the OPUS system was not the sole means of participation in the public consultation and consultation material was made available through multiple channels including physical copies of documents being made available in the Council-run libraries and

the principal Council Office. This is consistent with standard practice and individuals who did not have access to the internet at home could also access the consultation website through computers available at community-run libraries. Again, the evidence illustrates that a significant proportion of representations were received through non-digital methods demonstrating that alternative methods were not only made available but were utilised by members of the public without access to digital means.

The Council therefore considers that the public consultation process did not exclude non-digital participants from engaging in the process.

The LDP Regulations require the Council to work in partnership with a wide range of stakeholders in preparing the RLDP, including specific and general consultation bodies and the public. Appendix 1 of the Revised Delivery Agreement (January 2026) provides a list of all specific and general consultation bodies that have and will be consulted at the appropriate stages of the RLDP process. This list of consultees is not exhaustive and will be added to as appropriate throughout the RLDP process.

A programme of consultation and engagement events was undertaken in accordance with the Delivery Agreement. These events were promoted through a range of methods including social media, the Council website, local publicity, posters and direct notification to individuals registered on the Council's consultation database. The purpose of these events was to explain the Plan, answer questions regarding the consultation process and assist attendees in making formal representations where necessary. Such events provided opportunities for open discussion and helped the Council understand key concerns being raised by communities. Council officers were well informed and sought to address all questions and concerns raised to the best of their ability, based on the information available at the stage of plan preparation. However, formal representations were required to be submitted in writing so that they could be properly recorded, considered and responded to as part of the statutory process.

Specific comments have been made regarding the lack of recording of attendance at consultation events. While the Council accepts that records of attendance were not made, the level of attendance at each event was such that officers were otherwise engaged discussing and informing members of the public of the RLDP. The lack of formal recording of attendance does not in the view of the Council undermine transparency or diminish the relevance and attendance at the events.

Consultation periods are specified through statutory guidance as set out in the DPM and while extensions to these time frames are permissible, this is usually only undertaken when consultation periods overlap statutory holiday periods or other events.

Public consultation events were held in accessible local venues and scheduled across different dates and times, designed to maximise attendance. As detailed above, while no formal records of attendance were made, the Council is confident that attendance at the

events was high and indicates that there was both significant public awareness of the events and attendance. In arranging locations, every effort is made by the Council to secure venues that are accessible, of a size that can accommodate the anticipated levels of attendance and situated within areas affected by the RLDP. While this is not always possible, the Council is confident that the public consultation periods, dates and locations were well selected and encouraged participation in the RLDP.

Regulation 15 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended) requires the Council to publish its pre deposit proposals (Preferred Strategy) for public inspection and consultation before finally determining the content of the Deposit RLDP. The Preferred Strategy was published in December 2023, after a period of pre-deposit plan preparation and engagement. The Preferred Strategy set out the Vision, Issues, Objectives and broad spatial strategy for the Vale of Glamorgan. The Preferred Strategy was not the final RLDP, and did not include all of the detailed policies, land use proposals or infrastructure required to support development.

An Initial Consultation Report was prepared to outline how the Vale of Glamorgan Council undertook public participation and consultation on the Preferred Strategy, thereby fulfilling Regulation 16a of the LDP Regulations (as amended). The report identified the steps taken to publicise plan preparation as well as the consultation methods used, who was consulted, summaries of the main issues raised, how the representations received would be addressed and how this key period of consultation would influence development of the Deposit RLDP. The Initial Consultation Report included a commitment to request that the site promoters undertake informal engagement on placemaking with local communities to inform the masterplanning of these sites.

The Council therefore undertook a range of engagement activities prior to the Deposit Plan stage. This included consultation on the Preferred Strategy and targeted engagement exercises such as the Housing Growth in Barry consultation, which provided additional opportunities for residents to comment on potential development options before the Deposit Plan was prepared. Placemaking and community engagement sessions were also undertaken in relation to the proposed key site allocations, with consultation reports produced to demonstrate how feedback informed the emerging proposals. Information arising from these engagement exercises was considered during the preparation of the Deposit Plan.

On the 30th of September 2024 the RLDP Initial Consultation Report was considered and agreed at a meeting of Full Council. In agreeing the Initial Consultation Report, Full Council endorsed the actions set out within the document and granted approval to use the Preferred Strategy as a basis for progression on to the next stage of RLDP preparation, the Deposit Plan.

The process and justification for identifying the site at North West Barry was set out in the Housing Growth in Barry consultation and is also addressed in the Council's response to comments made on the HG1 KS1 allocation. The Housing Growth in Barry Report of Public Consultation was published as part of the Deposit Plan public consultation as part of the supporting information for the site. This sets out the consultation methods used, the key issues raised and highlights that that the session at Millwood Bowling Club on Tuesday 24th June 2025 was attended by VOG Planning Officers as well as representatives from Persimmon Homes (the site promoters for Land at North West Barry) and their consultant team, who were available to answer specific questions in respect of transport, landscape, drainage, ecology and design. This is consistent with the approach taken with the other key sites which allowed placemaking and community engagement before the Deposit Plan consultation. A consultation event was also held in Barry Memorial Hall in February 2026 as part of the Deposit Plan consultation which provided another opportunity of community engagement specific to Barry.

Representations have suggested that proposed allocations have been predetermined. This is not the case. Sites identified within the Deposit Plan are proposed allocations that have been assessed through the Plan-making process against a range of evidence and policy considerations. Following consultation, all representations are reviewed and considered by officers, and where appropriate, changes to the Plan may be recommended. Any proposed amendments will be documented and tracked prior to submission of the Plan to Welsh Government. Ultimately, it is the role of the independent Inspector to determine whether the RLDP is sound. All duly made representations will be available to the Inspector as part of that process.

In respect of alternative growth locations, a series of engagement workshops were held with stakeholders in January and February 2023 to inform the growth and spatial options taken forward and identified in the Preferred Strategy. This process is set out in BP1 Engagement Report Volume 1. The Sustainable Transport Oriented Growth option was considered to be the most suitable, and best accords with national planning policy. Additionally, the Council published the full Candidate Site Register and the assessment of each candidate site at both the Preferred Strategy and Deposit Plan stages as part of the consultation process. This information set out the assessment for every site and the reasons why sites were either allocated or not allocated in the Plan. Individuals were able to submit representations on any candidate site and its assessment during the consultation period.

The Council also notes comments regarding transparency and democratic accountability. The preparation of the RLDP has followed the statutory requirements established by Welsh Government and all decisions relating to progression of the Plan have been considered through the Council's democratic processes. Consultation reports have been prepared and reported to Council at key stages of the process, setting out the issues raised and how they have informed the Plan. The Council have also published representations received as part of

the consultation process in accordance with statutory requirements and data protection legislation. The requirement to publish certain respondent details was clearly explained within the consultation forms and associated guidance.

Following consideration of all duly made representations, the Council will publish a Consultation Report which will set out who was consulted, the key issues raised and how the Council considers each representation should be addressed. The Plan and its supporting documentation, including the Consultation Report, will be considered by Full Council for approval to submit it to the Welsh Government, who will arrange for an Independent Planning Inspector to be appointed to examine the Plan.

Overall, the Council considers that significant efforts were made throughout the RLDP process to ensure that the consultation was fair, transparent and accessible and provided a range of opportunities for individuals and organisations to engage with, understand and comment on the emerging Plan. All representations received will be carefully considered as part of the ongoing plan preparation process before the RLDP is submitted for independent examination. The Council considers that the statutory consultation requirements have been satisfied and that the consultation undertaken was proportionate to the scope, scale and purpose of the RLDP. Accordingly, no further consultation events are considered necessary, particularly in relation to developments in neighbouring authority areas, such as Cardiff Bay, which lie outside the Vale of Glamorgan administrative boundary. The Council is therefore satisfied that the consultation has been undertaken in accordance with the Delivery Agreement, Development Plans Manual and national planning policy requirements.

ANNEX 3 - STRATEGIC AND SPATIAL CHOICES, PLACEMAKING AND GOOD DESIGN

This section addresses the representations made on the policies within the Strategic and Spatial Choices and Placemaking and Good Design sections of the Deposit RLDP:

- Policy SP1 – Sustainable Growth Strategy
- Policy SP2 – Settlement Hierarchy
- Policy SP3 – Development in the Countryside
- Policy SSC1 – Development within Settlement Boundaries
- SP4 Placemaking
- PGD1 Creating Well Designed and Inclusive Places
- PGD2 Residential Development Densities
- SP5 Creating Healthy and Inclusive Places and Spaces

SP1 - SUSTAINABLE GROWTH STRATEGY

A total of 57 duly made representations were submitted from 43 individual respondents in respect of Policy SP1 Sustainable Growth Strategy (40 objections, 8 support, 9 comments), raising a number of issues.

Welsh Government have confirmed their support for the Sustainable Growth Strategy, confirming that it conforms with national planning policy and Future Wales and other respondents also expressed support for the principles of it.

However, objections were raised on a number of grounds including concerns about over-development and a lack of infrastructure and/or insufficient infrastructure capacity (highways, education, utilities, health) within specific settlements (including Rhoose, St Athan, Llantwit Major and Barry). Objections were also raised on the grounds of impact on biodiversity, loss of greenfield sites, flooding and the need to protect the Glamorgan Heritage Coast.

Several representors commented that the strategy did not conform with Future Wales, with one representor believing that the National Growth Area did not apply to the western Vale and others considering that the level of growth proposed was not sufficiently ambitious for a Future Wales National Growth Area.

Other concerns included the strategic approach to minor rural settlements, which resulted in limited allocations, and the view that an insufficient range of sites had been chosen in terms of both, with few opportunities for SMEs. Sully's role as a potential option to meet Barry's housing requirements was referenced.

STATUTORY CONSULTEE RESPONSES

5114 – Welsh Government (Planning Division) – Support

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.

Council response

The confirmation that the spatial strategy is in conformity with Future Wales is noted.

6714 – Cardiff and Vale University Health Board

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There

is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'. Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains.

Suggested Change

"The Local Development Plan will support resilient and sustainable local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part of sustainable growth."

Council response

Policy SP1 is a high-level strategic policy which sets out how the Sustainable Growth Strategy would be delivered in terms of housing, employment and infrastructure provision and the broad strategic area for growth. The specific detailed suggested change to reference sustainable local food systems has little relevance to the focus of the policy and is not considered to be a necessary change to make the RLDP sound.

6939 – Penarth Town Council - Comment

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

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

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

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

Council response

Developers proposing projects comprising major development have a statutory requirement to undertake pre-application consultation, which will involve consultation with the relevant Town or Community Council. Town and Community Councils will also be consulted on relevant planning applications within their area.

It is acknowledged that development opportunities within Penarth are limited. However, the allocated site at Upper Cosmeston Farm (HG2.1), which will deliver 576 units, will make an important contribution. With regard to windfall opportunities, the latest Urban Capacity Study indicates potential for 155 units on windfall sites, excluding any redevelopment of surplus open space and the re-use of empty homes.

The original Urban Capacity Study (BP19), prepared in 2023, was updated as part of the evidence base for the Deposit RLDP (BP19A). The purpose of the study is to identify potential sites that may come forward as windfall sites over the lifetime of the Plan. It should be noted that Headlands School is allocated for housing in the adopted LDP, having been put forward as a candidate site through that process. The site was not carried forward into the RLDP because there were concerns regarding its deliverability. As part of the revision to the Urban Capacity Study, the site boundary was amended and the site's potential capacity was reduced from 111 to 6 units. This reflects the potential conversion of an underutilised building rather than the comprehensive redevelopment of the wider site.

7230 – Dinas Powys Community Council – Support

Dinas Powys Community Council (DPCC) recognises and welcomes some improvements made in the revised Replacement Local Development Plan (RLDP). These changes demonstrate a more balanced approach to growth and a clearer acknowledgement of environmental and infrastructure constraints across the Vale. DPCC considers the following amendments to be positive and constructive:

Reduction in Overall Housing Numbers

The reduction in the total housing requirement reflects a more realistic assessment of demographic trends, household formation rates, and deliverability across the plan period. This reduces pressure on constrained settlements such as Dinas Powys.

Greater Emphasis on Sustainable Locations

The revised RLDP places stronger emphasis on locating development where sustainable transport options exist. This aligns with national policy and reduces reliance on private car travel.

Strengthened Climate-Change and Flood-Risk Policies

The Council welcomes the enhanced policy framework relating to:

• Climate-change adaptation

• Flood-risk management

• Sustainable drainage (SuDS)

• Nature-based solutions

These changes reflect national guidance and NRW expectations.

Recognition of Infrastructure Constraints

The revised evidence base acknowledges that certain settlements – including Dinas Powys - face:

• Highway capacity limitations

• Public transport constraints

• Limited school and healthcare capacity

This recognition is essential for sound plan-making.

Improved Evidence Base

The updated background papers, including the Settlement Sustainability Assessment and the Infrastructure Assessment, provide a clearer picture of constraints and opportunities across the Vale.

Council response

The support for additional policies and updated evidence base is noted.

INDIVIDUAL RESPONSES

SUPPORT

4517 – Watkins – Support

I am completely in support of new housing. I often wonder how my children will get on the housing ladder and in particular where.

Council Response

Support is noted.

6699 – Persimmon Homes (Asbri Planning) - Support

The Deposit Plan's overarching strategy in relation to sustainable growth is supported. The primary focus of concentrating housing growth within the 'Strategic Growth Area' (i.e. where the main centres of population are accommodated, and which are served by a range of facilities and services, and are accessible by a range of transport modes) as outlined by

Policy SP1 is considered appropriate and will allow for the delivery of sustainable and resilient communities.

As per previous representations submitted by Asbri Planning on behalf of Persimmon Homes in relation to the RLDP Preferred Strategy, the prior identification of the strategic-scale (1,500 unit) Key Site at North East Barry was considered to represent an over-reliance on one site to meet the housing demand of the Authority's Key Settlement (with associated constraints in relation to the delivery of units on a strategic-scale site within the early mid part of the plan period).

It is considered that the inclusion of North West Barry as a Key Site, supplemented by a number of smaller housing allocations as identified in Policy HG1, will ensure that the housing requirement for the Barry can be met in a robust and deliverable manner.

Council Response

Support is noted.

6736 – Hallam Land Management - Support

Hallam are generally supportive of the aims of this policy. The strategy of focusing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.

Council Response

Support is noted.

7057 – Barratt Redrow Homes (Highlight Planning) – Support

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.

Council Response

Support is noted.

7096 – Barratt Redrow Homes (Turley) - Support

The identification of St Athan as a settlement where development should be concentrated is supported.

Council Response

Support is noted.

7185 – H Jones, L Sungur and P John (Herbert R Thomas) – Support

The essence of Policy SP1 is supported. The promotion of small-scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA.

Council response

Support is noted.

COMMENTS/OBJECTIONS

4405 – Osgood – Comment

I live in Gileston and object to the Deposit RLDP unless it provides stronger protection for the setting of the GHC and clearer, place-based approach to development affecting Gileston. While I support RE and economic growth in principle, large-scale or energy-related development should be directed to appropriate brownfield sites such as Aberthaw rather than sensitive greenfield land near the coast. Where SD is proposed in this area, the RLDP should safeguard policy support for long-term transport improvements, including the potential for a future rail station or enhanced rail connectivity serving St Athan on the Barry–Llantwit Major line, supporting sustainable travel.

Council response

The representor has also made comments on Policy DNP3 Glamorgan Heritage Coast, and the matter of protection has been considered in the response to that representation.

The Former Aberthaw Power Station site is identified as an Employment Regeneration Opportunity Area. The RLDP has also safeguarded land for a potential new station at St Athan (Policy TR1.4)

4475 – Williams-O'Connor - Object

The plan will cause a lot of damage to natural wildlife, reduce green land even more and we do not have the infrastructure to support this. Lots of animals use this land and we are losing so much space to houses and families that don't always look after the spaces provided. This town is already so full of houses, there cannot possibly be room for more.

Suggested Change

To cancel the plan of developing housing. Too much green land is being lost and it is having a detrimental effect on the planet and the world we live in and our community. People are expected to make it to work to provide for families and contribute to the economy, how can we do this when the roads are flooded with traffic. Losing so much green space will also

impact wildlife which is another vital factor to the way of human life. How can we keep building houses, surely one day we will run out of room and is it worth getting to that stage?

Council response

Biodiversity has been a key consideration in the site selection process. In addition, at planning application stage, applications will need to be supported by a Green Infrastructure Statement and appropriate site-specific ecological survey work. In line with national planning policy, proposals must demonstrate a net benefit in times of biodiversity.

4489 - Harris – Object

The population of Rhoose is already too high and does not have the facilities needed to accommodate current residents, let alone the additional residents the plan aims to accommodate. It is impossible to get a doctors appointment, schools are overcrowded and underfunded, public transport is poor and the only road out of the village towards Cardiff and Barry is already too busy in the morning, especially as it is the only road from Rhoose, St Athan, Llantwit and surrounding villages. Traffic will become a nightmare unless NO houses are built. No one in Rhoose supports this.

Suggested Change

Find somewhere other than both Rhoose and St Athan to build houses. Do not build on farms and existing green spaces and spend the money to support the community, rather than adding increased pressure on the community, local facilities and local residents.

Council response

The RLDP Strategy seeks to direct housing growth within the Vale of Glamorgan to the most sustainable locations, in accordance with the LDP Settlement Hierarchy. This hierarchy provides the planning framework for the sustainable distribution and direction of development across the Vale. The spatial distribution set out in Table 3 of SP6 demonstrates how new housing growth is being directed in line with the Spatial Growth Strategy specifically towards those settlements that are best served by public transport connectivity and offer a broad range of services and facilities. Rhoose and St Athan are identified as Primary Settlements within the Sustainable Growth Area and Llantwit Major is a Service Centre Settlement, and the level of development proposed is reflective of their relative sustainability and capacity to accommodate growth.

4657 – Griffiths – Object

With the stated need for affordable/social housing in Barry it seems to me that these larger developments are only paying lip service to the stated need, the rest from what I see is a commercial/revenue seeking stream for the council.

Suggested Change

There is less and less suitable land for housing developments in Barry. Too much is being squeezed into an already overdeveloped area.

Council response

The RLDP evidence base does recognise that Barry is constrained and therefore options to accommodate new development within the settlement are limited. However, Barry is the only 'key settlement' within the settlement hierarchy based on its population, provision of key services and facilities, public transport accessibility and frequency, and employment opportunities. It is the most sustainable location in the Vale and as a consequence there is a need for Barry to accommodate a level of housing growth that is commensurate with its role and function. The sites that are allocated in the RLDP are considered to be appropriate locations to allow for the sustainable growth of Barry.

The key site proposed at North West Barry will be required to deliver 30% affordable housing in line with policy, which has been demonstrated to be viable. A number of other allocations are likely to be progressed by social housing providers utilising grant funding which will offer the opportunity to deliver higher levels of affordable housing than the policy requirement of 30%.

4662 – Griffiths – Object

Not enough of suitable land for large housing developments and infrastructure not designed to sustain current levels of traffic and increasing. People are travelling by car/van/lorry to employment out of the area because there are no large employers in the Vale now.

Suggested Change

Need to look at infrastructure to cope with present and future traffic levels.

Council response

The RLDP is supported by an Infrastructure Delivery Plan which sets out the infrastructure that would be required to support new developments over the plan period. The Plan is also supported by a Strategic Transport Assessment (BP14/BP14A), which considers the cumulative impact of RLDP development on the highway network and identifies necessary mitigation.

4668 – Griffiths – Object

Growth has got to be sensible and not prohibitive

Suggested Change

The plan needs to improve infrastructure.

Council response

The RLDP is supported by an Infrastructure Delivery Plan which sets out the infrastructure that would be required to support new developments over the plan period.

4669 – Griffiths – Object

The plan does not improve access to medical facilities. There has been no improvement in access to doctors/dentists since the last development plan.

Suggested Change

We need more gps and dentists in the area but cannot see that happening in the near future.

Council response

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites are identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented from April 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include

the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

4674 – Griffiths – Object

The amount of suitable land is getting smaller and smaller in Barry. You can only squeeze so much in an already tight area

Suggested Change

Focus on infrastructure all around.

Council response

The RLDP evidence base does recognise that Barry is constrained and therefore options to accommodate new development within the settlement are limited. However, Barry is the only 'key settlement' within the settlement hierarchy based on its population, provision of key services and facilities, public transport accessibility and frequency, and employment opportunities. It is the most sustainable location in the Vale and as a consequence there is a need for Barry to accommodate a level of housing growth that is commensurate with its role and function. The sites that are allocated in the RLDP are considered to be appropriate locations to allow for the sustainable growth of Barry.

4685 – Simmonds – Object

The area highlighted St Athan has no space for industry growth the proposed developments will put people in to an employment void which has no employment available to them.

Council response

It is inaccurate to state that St Athan has no space for employment growth as the settlement is one of the best served in terms of future employment opportunities in the Vale, with Bro Tathan Business Park and the Aberthaw Employment Regeneration Opportunity Area both in close proximity. It is anticipated that Bro Tathan will provide 66.7 ha of employment in the plan period.

4795 – Levett – Comment

1. Future Wales – Growth Area Classification

The RLDP appears to assume that the Vale of Glamorgan is a "growth area," but Future Wales does not classify the Vale, especially the western Vale, as part of the Cardiff, Newport and the Valleys National Growth Area.

Key points:

• Future Wales identifies specific National Growth Areas, and the Vale is not within them.

• The document additionally defines countryside communities, covering rural parts of Wales including the western Vale.

• Welsh Government stresses that LDPs must be in general conformity with Future Wales, which makes the spatial designation critical for soundness. Could you please confirm:
• Where Future Wales designates the Vale (or the western Vale) as a growth area; and
• The evidence used by the RLDP team to justify treating the authority as such.

2. Applicability of Future Wales Policies 4 & 5 to the Western Vale
Given that the western Vale is identified as a rural area, Future Wales Policies 4 and 5 must apply:
• Policy 4: LDPs must identify rural communities, assess their needs, and set out supportive policies.
• Policy 5: LDPs must plan positively to meet the employment needs of rural areas.
Bullet point issues:
• The western Vale is clearly categorised as rural, not as a growth-focused settlement zone.
• St Athan may have distinct airport related status, but this does not reclassify the surrounding rural settlements.
• The RLDP should demonstrate how Policies 4 and 5 are shaping its spatial and economic approach. Could you outline how the RLDP intends to incorporate Policies 4 and 5 into its strategy?

Council response

Policy 1 of Future Wales identifies three National Growth Areas, including South East Wales. The spatial strategy diagram supporting this policy identifies that the Vale of Glamorgan is located within the South East National Growth Area, referred to as 'Cardiff, Newport, and the Valleys.' Policy 1 is supplemented by Policy 33, which specifically relates to the Cardiff, Newport, and the Valleys National Growth Areas. This relates to the entirety of the Vale of Glamorgan administrative area, including the Western Vale, as illustrated in diagram included as part of Policy 33. Strategic and Local Development Plans should recognise the National Growth Area (NGA) as the focus for strategic economic and housing growth, services and facilities; advanced manufacturing; transport and digital infrastructure.

The Welsh Government have confirmed that they consider the RLDP to be in general conformity with Future Wales.

4857 – Reed – Object

No evidence is provided within the Plan to better public transport and other infrastructure with the key settlement of Rhoose. Rhoose also does not have good existing public transport infrastructure compared to other settlements with only 1 train per hour and 1 bus service which is long and tedious. Rhoose has few shops and most shops are accessed in Barry. Most doctors are in Barry or Llantwit Major. Rhoose has no comprehensive school. Rhoose is a town with the facilities of a village and should be treated as such.

Suggested Change

Rhoose to have better transport and infrastructure both public and road before any further development is considered. Rhoose needs local accessible facilities such as comprehensive schools, doctors etc before any further development. The plan should provide these to ensure it is sound. The evidence does not point to Rhoose being sustainable.

Council response

The RLDP is supported by an Infrastructure Delivery Plan which sets out the infrastructure that would be required to support new developments over the plan period.

The RLDP Strategy seeks to direct housing growth within the Vale of Glamorgan to the most sustainable locations, in accordance with the LDP Settlement Hierarchy. This hierarchy provides the planning framework for the sustainable distribution and direction of development across the Vale. The spatial distribution set out in Table 3 of SP6 demonstrates how new housing growth is being directed in line with the Spatial Growth Strategy specifically towards those settlements that are best served by public transport connectivity and offer a broad range of services and facilities. Rhoose is identified as a Primary Settlement within the Sustainable Growth Area and the level of development proposed is reflective of its relative sustainability and capacity to accommodate growth.

As detailed in the site-specific responses, Transport for Wales have proposals to increase the frequency of trains serving Rhoose station from 1 service an hour to 2 services an hour in each direction.

5043 – Hussey – Object

Please stop building on green field sites. There are a lot of brown field sites in the vale that can be used. They are more expensive to clear but that shouldn't matter. The health of the vale should be of primary concern. Soon we won't have any nature left.

Suggested Change

Brown field sites should be the first sites used. Look after the are we live in. Please don't destroy it.

Council response

The Council has sought to allocate brownfield sites in accordance with the search sequence set out in Planning Policy Wales. However, there is insufficient deliverable brownfield land in sustainable locations to meet the area's future housing needs.

5050 – Hussey – Comment

What is the problem with the building of council houses. Reading the plan everything sounds wonderful. Will reality live up to its aims.

Suggested Change

Reading the plan everything sounds wonderful. Will reality live up to its aims.

Council response

The RLDP sets an affordable housing target of 3,070 affordable homes over the plan period. This will comprise both homes delivered by the Council as new Council housing, and by the Council's Registered Social Landlord partners.

5060 – Davies – Object

I object.

Suggested Change

Total re think.

Council response

The objection is noted.

5069 – Sloman – Object

This is an objection to further development in Rhoose on the following grounds:

- over development without improvement to infrastructure
- current roads unable to support additional traffic as a result of further development
- loss of green fields to building, solar panels, battery storage units
- additional pressure on already overloaded pumping stations/sewerage infrastructure
- adverse effect on current residents mental health due to over population of the village and loss of green areas
- increase in youth annoyance/antisocial behaviour

Council response

The concerns are noted. The RLDP is supported by an Infrastructure Delivery Plan which sets out the infrastructure that would be required to support new developments over the plan period. The Plan is also supported by a Strategic Transport Assessment (BP14/BP14A), which considers the cumulative impact of RLDP development on the highway network and identifies necessary mitigation.

Whilst it is recognised that change within a community can cause concern for some residents, there is no substantive evidence to demonstrate that residential development at would result in adverse mental health impacts arising from 'over population' of the settlement.

The Council acknowledges the concern that new housing development could lead to an increase in anti-social behaviour. However, there is no evidence to suggest that the allocation of land for residential development will, in itself, result in anti-social behaviour.

5297 – Timmins - Comment

There needs to be a Plan for Wales that includes Housing, Jobs, better Public Transport. The plan should also take into account the wellbeing of the people who live there. This should include much more local, detailed examination of communities, their feelings, the mix of land use. The plan below is mainly about building housing. Destroying farm land goes against the feeling of what Wales is. I just feel that this is a plan to satisfy the needs of the UK Government and to make developers richer by building over our legacy to future generations.

Council response

Future Wales: the national plan 2040 is the development plan for Wales. The RLDP must align with the policies set out within Future Wales. The Welsh Government have assessed the RLDP against Future Wales and have confirmed that it is in general conformity.

Whilst it is acknowledged that delivering 'Homes for all' is an objective of the plan, there are a number of other objectives that this must be balanced with, including 'protecting and enhancing the natural environment.'

5315 – Watts – Object

There is no infrastructure to go with all this housing ie: No Dental provisions

No Doctor availability

No school facilities

Everything is overwhelmed!

Suggested Change

Set up more infrastructure first, then look it again.

Council response

The RLDP is supported by an Infrastructure Delivery Plan which sets out the infrastructure that would be required to support new developments over the plan period.

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development

and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites are identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented from April 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

In respect of educational provision, the Council has undertaken an assessment of educational need generated by the site in respect of forecast future school places for nursery, primary and secondary education (BP43 Education). Where additional school places are needed, these will be secured through Section 106 agreements.

5427 – Evans – Object

This indicates that Rhoose, St Athan and Llantwit Major are suitable for additional housing as they are served by existing public transport, however this does not take into account that train services are 1 per hour and have regularly had the promise of increase deferred and those trains at peak times are already overloaded. St Athan does not have a train station. Buses are also 1 per hour in Rhoose, so this can not be considered well served. Road access

is also very overloaded along Port Road, and proposals to mitigate this are based on outdated traffic counts.

Suggested Change

Remove Rhoose, St Athan and Llantwit Major from the list for housing development.

Council response

The RLDP Strategy seeks to direct housing growth within the Vale of Glamorgan to the most sustainable locations, in accordance with the LDP Settlement Hierarchy. This hierarchy provides the planning framework for the sustainable distribution and direction of development across the Vale. The spatial distribution set out in Table 3 of SP6 demonstrates how new housing growth is being directed in line with the Spatial Growth Strategy specifically towards those settlements that are best served by public transport connectivity and offer a broad range of services and facilities. Rhoose and St Athan are identified as Primary Settlements within the Sustainable Growth Area and Llantwit Major is a Service Centre Settlement, and the level of development proposed is reflective of their relative sustainability and capacity to accommodate growth.

As detailed in the site-specific responses, Transport for Wales have proposals to increase the frequency of trains serving Rhoose station from 1 service an hour to 2 services an hour in each direction.

5482 – D Entwistle – Object

The plan in its current form is far from sustainable. The amount of housing proposed will overwhelm the current infrastructure which already cannot cope with the current population. The locations are poorly thought out and do not have adequate access to public transport. The plan does not propose adequate solutions to address the lack of public transport and other infrastructure. Simply saying additional infrastructure to support the sale of growth will be identified is not acceptable. The strategy lacks clarity, depth and is based upon inadequate outdated information.

Suggested Change

The plan needs to lay out more clearly how infrastructure and public transport links will be improved prior to the proposal of new housing developments. Having read through the data much of the information given is based upon, it seems to be out of date and limited in scope. New data needs to be collected and in much greater depth, especially around issues such as traffic volumes. This would allow better decisions to be made and hopefully highlight issues that residents say is currently a problem but the council seem to be unaware of or ignoring.

Council response

The RLDP is supported by an Infrastructure Delivery Plan which sets out the infrastructure that would be required to support new developments over the plan period. The Plan is also supported by a Strategic Transport Assessment (BP14/BP14A), which considers the cumulative impact of RLDP development on the highway network and identifies necessary mitigation.

5507 – B Entwistle - Object

Barry is seen as an easy town to cram houses in incorrect sites such as the site at North West Barry.

This site does not have good transport links for commuters, the train station is not an easy walk & will add considerably to the time spent commuting especially if children have to be dropped to school on route. This site will encourage use of cars & increased traffic from proposed sites in Rhoose & the Vale will make life very difficult for commuters & all road users. Garage is nearest shop which is a dangerous walk across busy forecourt.

Suggested Change

Additional infrastructure statement is totally unacceptable.

Infrastructure improvements should be identified & implemented before & not after any developments go ahead.

Council response

The RLDP evidence base does recognise that Barry is constrained and therefore options to accommodate new development within the settlement are limited. However, Barry is the only 'key settlement' within the settlement hierarchy based on its population, provision of key services and facilities, public transport accessibility and frequency, and employment opportunities. It is the most sustainable location in the Vale and as a consequence there is a need for Barry to accommodate a level of housing growth that is commensurate with its role and function. The sites that are allocated in the RLDP are considered to be appropriate locations to allow for the sustainable growth of Barry.

The respondent has also made representations on KS1 Land at North West Barry which have been addressed under the composite response to that site.

5510 – B Entwistle - Object

Housing is focusing on Barry & the residents of Barry are experiencing problems with lack of healthcare & other services.

Traffic around the town is getting out of hand even during the day.

Commuting to work is taking longer & public transport & parking at the station at Barry is inadequate.

Barry & it's services are at breaking point.

The town needs improving - roads, pavements etc & green space retained such as the land at Weycock Cross to encourage well being for it's residents & wildlife.

Suggested Change

Take the focus off Barry for housing.

Provide smaller settlements at places like Culverhouse Cross & provide a little more infrastructure in these areas.

Increase housing in all other areas of the Vale to ensure the burden of extra housing & it's needs are shared & not shouldered by Barry all the time!

Council response

Barry is the only 'key settlement' within the settlement hierarchy based on its population, provision of key services and facilities, public transport accessibility and frequency, and employment opportunities. It is the most sustainable location in the Vale and as a consequence there is a need for Barry to accommodate a level of housing growth that is commensurate with its role and function. The sites that are allocated in the RLDP are considered to be appropriate locations to allow for the sustainable growth of Barry.

5658 – Thompson – Object

The plan does not give detailed plans on how it will prevent flood risk in several areas across the plan, mitigate traffic congestion and has significantly underestimated the additional pressures on roads and services.

Suggested Change

For VOG to take clear responsibility for where they plan to allocate housing:

Not on Green Wedge land.

Be honest about local amenities.

Be honest about travel times.

Consider the local environment and wildlife that frequent the area.

Take heed of the flood risk areas.

Council response

The RLDP is supported by a Strategic Flood Consequences Assessment (BP21) and Flooding Background Paper (BP21A) which explain how flood risk has been taken into account in the plan. The Plan is also supported by a Strategic Transport Assessment (BP14/BP14A), which

considers the cumulative impact of RLDP development on the highway network and identifies necessary mitigation.

5660 – Campbell – Object

The deposit plan is based around public transport being sufficient in areas that it is not. Rhoose, St Athan, and Llantwit Major are not accessible frequently without vehicular transportation, thus making the base plan for this moot, as it specifies public transport. Infrastructure within these areas is not sufficient for current residents let alone future development.

Suggested Change

Rhoose, St Athan, Llantwit Major need to be removed from the plan until sufficient public transport and infrastructure is in place for further development. Developers are being coined as the placemakers of these plans which is incorrect as S106 monies is not sustainable for development given inflation costs, deliverability of projects and also uptake of schemes.

Council response

The RLDP Strategy seeks to direct housing growth within the Vale of Glamorgan to the most sustainable locations, in accordance with the LDP Settlement Hierarchy. This hierarchy provides the planning framework for the sustainable distribution and direction of development across the Vale. The spatial distribution set out in Table 3 of SP6 demonstrates how new housing growth is being directed in line with the Spatial Growth Strategy specifically towards those settlements that are best served by public transport connectivity and offer a broad range of services and facilities. Rhoose and St Athan are identified as Primary Settlements within the Sustainable Growth Area and Llantwit Major is a Service Centre Settlement, and the level of development proposed is reflective of their relative sustainability and capacity to accommodate growth.

As detailed in the site-specific responses, Transport for Wales have proposals to increase the frequency of trains serving Rhoose station from 1 service an hour to 2 services an hour in each direction.

As detailed in the Infrastructure Delivery Plan, there will be a requirement for Section 106 funding to secure any necessary mitigation. This sum will be evidenced based on the cost of delivery of the necessary infrastructure.

5670 – Campbell – Object

Rhoose, St Athan and Llantwit Major do not have sustainable bus or train networks, with in frequent bus services and trains once an hour, if at all. This will increase vehicular traffic.

Council response

The RLDP Strategy seeks to direct housing growth within the Vale of Glamorgan to the most sustainable locations, in accordance with the LDP Settlement Hierarchy. This hierarchy provides the planning framework for the sustainable distribution and direction of development across the Vale. The spatial distribution set out in Table 3 of SP6 demonstrates how new housing growth is being directed in line with the Spatial Growth Strategy specifically towards those settlements that are best served by public transport connectivity and offer a broad range of services and facilities. Rhoose and St Athan are identified as Primary Settlements within the Sustainable Growth Area and Llantwit Major is a Service Centre Settlement, and the level of development proposed is reflective of their relative sustainability and capacity to accommodate growth.

As detailed in the site-specific responses, Transport for Wales have proposals to increase the frequency of trains serving Rhoose station from 1 service an hour to 2 services an hour in each direction.

5770 – Hart – Object

Barry is already oversized and infrastructure, particularly roads and sewage disposal, do not work properly. Green wedges were introduced to prevent urban sprawl (a council policy) and they should be honoured or Barry will continue to grow. Changing Green Wedges to suit developers is unacceptable.

Adding and improving road junctions will not overcome the increased demand on our roads.

The water authority cannot be trusted to dispose of increased sewage/rainwater. They don't even cope with existing load (witnessed by the 'safer-seas' app.) Tourists need to be attracted, not repelled by sewage floating in the sea.

Suggested Change

The plan needs to show that Barry has reached its maximum size and is a clean and healthy place to live in. We now need new settlements away from existing towns and villages. Margins either side of main roads can accomodate many houses and further use of such land should be made to spread housing around the area. We do not want to all be crammed into one massive town.

Council response

The RLDP strategy was developed through extensive stakeholder engagement and is considered to accord with national planning policy, as confirmed by the Welsh Government in their representation to the Deposit Plan.

Proposals for a new settlement would be contrary to national planning policy which considers that such proposals should only be identified through the Strategic Development Plan process.

5813 – Hart – Object

Barry is too large already and overpopulated.

Roads do not cope. Welsh Water do not cope with sewage.

Suggested Change

Road capacity needs to be increased to cope properly with current demand before considering expansion.

The irresponsibility and poor performance of Welsh Water also need to be taken into account before considering expansion.

Council response

The RLDP is supported by an Infrastructure Delivery Plan which sets out the infrastructure that would be required to support new developments over the plan period. This includes any water supply and sewerage network upgrades where necessary. The Plan is also supported by a Strategic Transport Assessment (BP14/BP14A), which considers the cumulative impact of RLDP development on the highway network and identifies necessary mitigation.

5847 – Smith – Object

Lack of road and basic infrastructure (sewage capacity, electricity + gas grids) - Dr, dentists etc..

Suggested change

Much more consideration needs to be taken into account of know bottle necks e.g the plan states "proposed railway stations" - it should be "Actual railway stations" -- until its built its not available for use -- same applies for estate parks / facilities that don't have the funds ring fenced before construction of estates begins and then doesn't get completed e.g. Barry waterfront.

Council response

The RLDP covers the plan period up to 2036 and where there is a realistic prospect that new infrastructure (including stations) and employment sites will be delivered in the plan period, it is appropriate to refer to these opportunities.

5848 – Smith – Object

Your assuming employment opportunities will be in the local area - we have increased unemployment.

Council response

The RLDP makes provision for up to 5,338 jobs through the allocation of a range of sites for employment purposes. In addition, existing employment land is subject to appropriate protection.

5890 – HBF – Comment

The plan lacks aspiration and does not provide a level of growth in line with the Vale's role as part of the national growth area identified in Future Wales.

The plan's role is to balance the 'need' for housing in a sustainable way, rather than limit delivery.

The plan's housing requirement is being limited by a level of delivery lower than the plan has previously achieved.

Delivering more housing will support economic growth and deliver more affordable homes.

The latest Welsh Government housing needs data requires an increase in the level of housing proposed.

Council response

The Council considers that the level of housing growth proposed in the RLDP is appropriate within the context of the National Growth Area, setting housing and employment growth at a level that is ambitious but deliverable and complementary to Cardiff's role as an economic driver within the region.

Furthermore, the level of growth in the context of the National Growth Area is considered appropriate by Welsh Government, who confirm that the Deposit RLDP to be in general conformity with the Future Wales.

The RLDP preferred growth option is a moderate level of growth based on a ten-year average, which is considered an appropriate time period as reflects both periods of low housebuilding (as low as 115 units per annum) and significant increases in housebuilding following the adoption of the LDP (917 units in a single year). To base a housing requirement figure only on years of high housing completion rates fails to reflect the variable nature of housebuilding linked in part to economic trends and an average is a more realistic and robust approach.

It is acknowledged that the Welsh Government published its 2025-based estimates of additional housing need on 12 February 2026. It should be recognised that these are national estimates for Wales and are not local authority-level assessments. The purpose of these estimates is to illustrate a range of possible future housing need, based on past trends and the best available data. They also provide an indication of how additional housing need might be split between market and affordable housing under a set of assumptions and are intended to support discussions on future housing policy. Welsh Government is clear that these estimates should not be used as housing targets.

It should be noted that these estimates were revised on 5 August 2026 following the identification of a minor error. At the same time, Welsh Government published additional guidance highlighting that the 2024-based national population projections, released in April 2026, showed a different pattern for Wales compared with earlier projections. Specifically, the principal projection was lower than any recent principal projection for Wales and indicated a decline in the population over the 25-year projection period. In addition, the latest population estimates showed a decrease in Wales' population between 2024 and 2025. In light of this, Welsh Government stated that "users of this output are advised that evidence from the latest national population projections and population data suggests that the estimates of additional housing need published here are likely to be at the upper end of the range."

Representations on the housing growth figure are also addressed under Policy SP6.

5891 – HBF – Comment

In line with the comments already made on point 1 of the sustainable growth strategy, the HBF considers that the level of housing proposed lacks ambition and is not in line with the Vale of Glamorgan's position as a regional growth area in Future Wales.

The words 'including a minimum of 3,070 affordable homes' should be changed to ' a target of 3,070 affordable homes'. The reason for this is that a minimum suggests that it should be more; however, other relevant housing policies are worded to provide for a defined number or target. This change in wording does not stop more from being delivered.

The approach to limiting housing development, other than affordable-led schemes with a minimum of 50% affordable, in the identified towns and villages, restricts the ability of SME developers and, therefore, the range of homes that might be provided by the plan.

The HBF questions the wording under the heading 'Infrastructure', which is not appropriate wording, as it is part of the plan's role to identify the necessary infrastructure to deliver the level of growth proposed. The provision of infrastructure, which is necessary for development, is covered by other policies in the plan.

Why is the housing flexibility allowance figure not included in this policy?

Council response

The Council considers that the level of housing growth proposed in the RLDP is appropriate within the context of the National Growth Area, setting housing and employment growth at a level that is ambitious but deliverable and complementary to Cardiff’s role as an economic driver within the region.

Furthermore, the level of growth in the context of the National Growth Area is considered appropriate by Welsh Government, who confirm that the Deposit RLDP to be in general conformity with the Future Wales.

The concern regarding the reference to the affordable housing target as a 'minimum' has also been raised under Policy SP7. In response, it is explained that, where sites do not have planning permission, the calculation assumes that affordable housing will be delivered at policy-compliant levels, namely 30-40% for market-led sites and 50% for affordable housing-led sites. However, some sites may ultimately be delivered with higher levels of affordable housing, including 100% affordable housing schemes brought forward as exception sites or delivered by the Council and its RSL partners. For this reason, the figure set out in Policy SP7 is considered to be a minimum target for the Plan.

The provision of the necessary infrastructure to support development is an important component of the strategy and should be referred to in Policy SP1, with further detail on delivery provided in subsequent policies of the Plan and the Infrastructure Delivery Plan.

A range of site sizes has been allocated, with allocations ranging from 25 to 600 dwellings. There is also potential for the affordable housing-led sites to be delivered by SMEs.

Policy SP1 sets out the housing requirement, which is the number of dwellings the Plan is expected to deliver over the Plan period. This differs from the housing provision figure, which comprises the housing requirement plus a flexibility allowance, as set out in Policy SP6. As Policy SP1 establishes the housing requirement in the context of the overarching strategy, it is not considered necessary to also include the flexibility allowance. The Plan should be read as a whole, with Policy SP6 providing further detail and context to Policy SP1.

5990 – Barratt Redrow Homes (Lichfields) – Object

Policy SP1 proposes delivering 7,890 dwellings by 2036, including 3,070 affordable homes, with new sites outside Strategic Growth Areas limited to small-scale affordable housing schemes. However, Welsh Government 2022-based projections estimate households in the Vale of Glamorgan will increase from 57,676 in 2021 to 67,299 by 2036, a rise of 9,623 households. With a 4% household-to-dwelling conversion uplift, the required dwellings would be 10,008, significantly above the plan target. The policy also proposes 205 affordable homes per year, far below the LHMA 2023 identified need of about 1,075–1,114 annually, meaning affordable housing delivery would meet only 18.4% of identified demand.

Suggested Changes

In order for Policy SP1 to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"

Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside

of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites in appropriate Primary and Minor Rural Settlements. In order to meet the true identified housing needs of VoG during the RLDP period, Primary and Minor Rural Settlements will likely need to accommodate further new dwellings than the RLDP currently allocates (please refer to our comments below on Policy SP2 and Policy HG4 for further commentary).

Council response

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

This point is also addressed under Policy SP6 Housing requirement.

The RLDP is clear that the strategy seeks to focus development within the Strategic Growth Area, comprising those settlements that are considered the most sustainable. Limited growth may be appropriate within the more sustainable Minor Rural Settlements; however, this is restricted to affordable housing-led development.

6025 – Miller – Object

The proposed plan will place further strain on already barely adequate public services; the roads are already heavily congested particularly during peak travel times; there will be a

detrimental loss of green spaces within the area which may reduce the area's capacity to create a feeling of well being.

The roads are already in a poor state with much restorative work urgently required so any increase in the number of cars will only exacerbate this situation.

Suggested Change

Before further plans for building new housing areas are considered, there should be an increase in the provision of basic facilities such as GP Surgery, Dental Surgery, improved public transport links, creation of more spaces within schools at all levels from Reception to Year 12**.**

Council response

The RLDP is supported by an Infrastructure Delivery Plan which sets out the infrastructure that would be required to support new developments over the plan period. The Plan is also supported by a Strategic Transport Assessment (BP14/BP14A), which considers the cumulative impact of RLDP development on the highway network and identifies necessary mitigation and an Education Background Paper (BP43) which considered the impact of development on school capacity.

6170 – Tipples – Object

Why is all the housing being considered all along one main road from Rhoose to Weycock Cross? The area can't handle the current level of traffic. One small car breaking down along that road chokes up the whole of Barry. Then you want to add 1000+ houses along the same route. How can this not be seen as a poor decision? We all understand that there needs to be new housing, but surely more thought could go into choosing a more suitable area to build.

Suggested Change

Don't build at Weycock Cross, and reconsider the housing in Rhoose due to the volume of traffic along one main road.

Council response

The Plan is also supported by a Strategic Transport Assessment (BP14/BP14A), which considers the cumulative impact of RLDP development on the highway network and identifies necessary mitigation. This includes identified improvements to Weycock Cross roundabout.

6290 – Ashman - Object

There is a problem with traffic across Barry and Rhoose. The college plus more houses being built at Rhoose point, the ongoing battle at Model farm as well as more houses being built

at Weycock cross will add to traffic congestion. There also is only one train and bus an hour so if you're trying to get cars off the roads these need to be increased.

Council response

The Plan is also supported by a Strategic Transport Assessment (BP14/BP14A), which considers the cumulative impact of RLDP development on the highway network and identifies necessary mitigation. This includes identified improvements to Weycock Cross roundabout.

As detailed in the site-specific responses, Transport for Wales have proposals to increase the frequency of trains serving Rhoose station from 1 service an hour to 2 services an hour in each direction.

6535 – MS Andrew RT Davies – Object

The entire strategy behind the deposit plan is flawed and the process needs to begin again.

Council response

The RLDP strategy was developed through extensive stakeholder engagement and is considered to accord with national planning policy, as confirmed by the Welsh Government in their representation to the Deposit Plan.

6818 - Mr Ian Fairweather (Boyer Planning) - Object

There is concern that the proposed primary focus of housing growth within the Vale being within the Strategic Growth Area. Limiting development at suitable settlements outside the Strategic Growth Area is not the correct approach and greater flexibility is required to deliver the housing need. Clearly there is a requirement to provide further allocations in sustainable Minor Rural settlements identified as being 'Outside of the Strategic Growth Area' – namely St Nicholas.

Suggested change

It is strongly recommended that appropriate consideration is given to the widening of the Strategic Growth Areas to include St Nicholas as a sustainable settlement which is capable of accommodating a new allocation.

Council response

The spatial strategy of the Deposit RLDP has been developed to align housing growth with the most sustainable locations in the Vale of Glamorgan, where there is greatest access to employment opportunities, services, facilities and public transport.

The RLDP does already include a small number of targeted allocations outside of the Strategic Growth Area in sustainable settlements where a limited number of additional dwellings would be appropriate. The plan also provides the policy framework to allow new

development and redevelopment within defined settlement boundaries, including minor rural settlements outside of the Strategic Growth Area, to be delivered (Policy SSC1) and affordable housing exceptions sites (Policy HG5).

6858 – Mr Andrew Raymond (Boyer Planning)

The approach adopted within the RLDP places an overly narrow emphasis on growth within the Strategic Growth Area, primarily focused along rail corridors. This approach risks overlooking other sustainable rural settlements which also demonstrate appropriate connectivity and capacity to accommodate proportionate growth.

Settlements outside the Strategic Growth Area continue to perform an important role within the Vale's settlement hierarchy and rural economy. Villages such as Colwinston provide an established residential community and contribute to the vitality and sustainability of rural areas. Restricting opportunities for modest growth within such settlements risks undermining the long-term sustainability of rural communities.

The principle of directing development to sustainable settlements is supported. However, limiting development opportunities exclusively within the Strategic Growth Area is not considered to represent the most balanced or flexible spatial strategy.

Suggested change

Greater flexibility should be introduced to allow appropriate small-scale allocations within sustainable rural settlements.

Council response

The spatial strategy of the Deposit RLDP has been developed to align housing growth with the most sustainable locations in the Vale of Glamorgan, where there is greatest access to employment opportunities, services, facilities and public transport.

The RLDP does already include a small number of targeted allocations outside of the Strategic Growth Area in sustainable settlements where a limited number of additional dwellings would be appropriate. The plan also provides the policy framework to allow new development and redevelopment within defined settlement boundaries, including minor rural settlements outside of the Strategic Growth Area, to be delivered (Policy SSC1) and affordable housing exceptions sites (Policy HG5).

6844 – Taylor Wimpey (Savills) – Object

Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider

locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.

With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Suggested change

I advocate for a broader search beyond Barry and recognise Sully's role within the Strategic Growth Area. Growth should be allocated to the most suitable, sustainable locations, not solely within Barry.

Council response

Barry is a key settlement and the most sustainable settlement in the Vale of Glamorgan. Whilst it is recognised that Sully in reasonable distance of Barry and could serve a complementary role, it is a primary settlement in its own right. As there are suitable options in Barry to deliver an appropriate level of growth, it is not considered necessary to allocate additional development in neighbouring settlements over and above what is already committed.

It should be noted that Phase 2 of Land West of Swanbridge Road has been granted reserved matters planning permission and therefore 175 dwellings are already committed within Sully.

As set out in BP18A Candidate Site Assessment at Deposit Plan stage, the site that is being promoted by the respondent (376 Land West of Swanbridge Road, Sully) was ruled out as "*Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy".*

6893 – Catesby Estates (Turley) – Object

Policy SP1 - Sustainable Growth Strategy reiterates that the Plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that, outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

In order to ensure that the minimum target figure is met, it is important that the Plan identifies a sufficient number of sites / housing allocations to meet both the short and longer term development needs. As previously stated, Catesby SUPPORTS the overall growth strategy across the Vale of Glamorgan contained in the Deposit RLDP. However, it is questioned whether or not there is sufficient land allocated to deliver the growth required.

Of the overall housing target of 7,890 dwellings, approximately half of these are to be delivered via rolled forward allocations and extant consents. Whilst some such sites can be expected to come forward, Catesby would caution against the over-reliance on delivery of historically allocated sites.

Catesby suggests that VoGC considers the inclusion of additional sites to deliver the predicted growth strategy identified in the RLDP. This will strengthen the land supply position ensuring a robust RLDP can be adopted which has the ability to ensure the delivery of the necessary growth. Catesby supports growth along the 'Connectivity' corridor, particularly in Minor Rural Settlements such as Llandow to assist with this.

Suggested Change

Catesby suggests that VoGC considers the inclusion of additional sites to deliver the predicted growth strategy identified in the RLDP. This will strengthen the land supply

position ensuring a robust RLDP can be adopted which has the ability to ensure the delivery of the necessary growth.

Council response

As demonstrated in the housing trajectory, the plan does already make provision for short and long term development over the plan period. It is not considered that additional sites are needed to deliver the housing requirement. It is recognised that there are a number of extant planning consents which may up a large proportion of the existing supply. However, the plan does also allocate a number of new sites in addition.

The majority of sites that were rolled forward from the LDP either have planning permission or a planning application at an advanced stage of determination. The only two sites that are not within that category are HG1 (1) Land to the west of Pencoedtre Lane, Barry and HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C), Llantwit Major, although both are considered to be deliverable. The first site is within the ownership of the Council and is being brought forward under the Cardiff and Vale Housing Partnership. The second site has recently been acquired by Welsh Government and will be brought forward alongside the adjoining parcels of land (HG2(2) and HG2(3)).

7036 – Marion Morgan (Geraint John Planning) – Object

We object to the spatial growth strategy set out within the Deposit Plan and therefore question the delivery and soundness of the 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 an over-reliance of housing growth on this defined area, and the associated absence of growth in other Rural parts of the plan area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan, which includes enabling opportunities to provide employment and business premises within/near to rural settlements. 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. The current strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas. 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 and bus services should be appropriately assessed and focused on in terms of promoting sustainable development. 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 deliver housing in the short and medium term of the Plan period.

Council response

The spatial strategy of the Deposit RLDP has been developed to align housing growth with the most sustainable locations in the Vale of Glamorgan, where there is greatest access to employment opportunities, services, facilities and public transport.

The RLDP does already include a small number of targeted allocations outside of the Strategic Growth Area in sustainable settlements where a limited number of additional dwellings would be appropriate. The plan also provides the policy framework to allow new development and redevelopment within defined settlement boundaries, including minor rural settlements outside of the Strategic Growth Area, to be delivered (Policy SSC1) and affordable housing exceptions sites (Policy HG5).

It is acknowledged that some Vale settlements are in reasonable proximity of settlements outside of the Vale (Bridgend and Talbot/Green/Pontyclun/Llantrisant). However, the settlement does need to be considered appropriate to accommodate additional growth in its own right to reduce the need to travel for services and facilities.

7058 – Barratt Redrow Homes (Highlight Planning) – Object

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. The strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services. 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. SP1 should be amended to reflect this.

In our view, the current Deposit strategy has moved too far away from the balanced position on Minor Rural Settlements in the adopted LDP. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role.

Suggested change

Amend SP1.

Council response

The spatial strategy of the Deposit RLDP has been developed to align housing growth with the most sustainable locations in the Vale of Glamorgan, where there is greatest access to employment opportunities, services, facilities and public transport.

The RLDP does already include a small number of targeted allocations outside of the Strategic Growth Area in sustainable settlements where a limited number of additional

dwellings would be appropriate. The plan also provides the policy framework to allow new development and redevelopment within defined settlement boundaries, including minor rural settlements outside of the Strategic Growth Area, to be delivered (Policy SSC1) and affordable housing exceptions sites (Policy HG5).

7071 – Barratt Redrow Homes (Highlight Planning) – Object

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.

Council response

The RLDP does already include a small number of targeted allocations outside of the Strategic Growth Area in sustainable settlements where a limited number of additional dwellings would be appropriate. The plan also provides the policy framework to allow new development and redevelopment within defined settlement boundaries, including minor rural settlements outside of the Strategic Growth Area, to be delivered (Policy SSC1) and affordable housing exceptions sites (Policy HG5).

7136 – Peter Stone Properties (Geraint John Planning) – Object

We object to the spatial growth strategy within the Deposit Plan and consequently question its soundness and delivery. Specifically, we object to the 'Strategic Growth Area' (SGA) strategy, which creates an over-reliance on a single defined area while neglecting the Rural Vale.

The Plan is internally inconsistent: while it recognises a critical need for affordable housing—particularly for an increasingly ageing population and to prevent the out-migration of younger working-age residents—the lack of allocations in Minor Rural Settlements (such as Bonvilston) undermines these objectives. The current strategy fails to address the high entry costs in rural areas (where average prices exceed £800k) and ignores the Local Housing Market Assessment (LHMA) requirements for affordable delivery outside the SGA.

Furthermore, the Plan fails to account for the functional relationship between the Western/Northern Vale and external employment hubs in Bridgend and Talbot Green/Llantrisant. By focusing growth solely on rail-accessible settlements, the Plan ignores the 'inherently rural' nature of the Vale and fails to support sustainable bus-based transit and local employment opportunities. To be sound, the Plan must pursue a strategy that allocates a greater proportion of small-to-medium sites in rural settlements to ensure

delivery in the short-to-medium term and to create a more balanced demographic and economic future for the Authority.

Council response

The spatial strategy of the Deposit RLDP has been developed to align housing growth with the most sustainable locations in the Vale of Glamorgan, where there is greatest access to employment opportunities, services, facilities and public transport.

The RLDP does already include a small number of targeted allocations outside of the Strategic Growth Area in sustainable settlements where a limited number of additional dwellings would be appropriate. The plan also provides the policy framework to allow new development and redevelopment within defined settlement boundaries, including minor rural settlements outside of the Strategic Growth Area, to be delivered (Policy SSC1) and affordable housing exceptions sites (Policy HG5).

It is acknowledged that some Vale settlements are in reasonable proximity of settlements outside of the Vale (Bridgend and Talbot/Green/Pontyclun/Llantrisant). However, the settlement does need to be considered appropriate to accommodate additional growth in its own right to reduce the need to travel for services and facilities.

7158 – Wig Fach Property Company Ltd (Geraint John Planning) – Object

We object to the spatial growth strategy set out within the Deposit Plan and therefore question the delivery and soundness of the 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 an over-reliance of housing growth on this defined area, and the associated absence of growth in other Rural parts of the plan area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan, which includes enabling opportunities to provide employment and business premises within/near to rural settlements. 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. The current strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas. 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 and bus services should be appropriately assessed and focussed on in terms of promoting sustainable development. 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 deliver housing in the short and medium term of the Plan period.

Council response

The RLDP does already include a small number of targeted allocations outside of the Strategic Growth Area in sustainable settlements where a limited number of additional dwellings would be appropriate. The plan also provides the policy framework to allow new development and redevelopment within defined settlement boundaries, including minor rural settlements outside of the Strategic Growth Area, to be delivered (Policy SSC1) and affordable housing exceptions sites (Policy HG5).

7186 – H Jones, L Sungar and P John (Herbert R Thomas) – Object

The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale. Without targeted allocations outside of the SGA, as outlined in Policy SP1, the housing gap will continue to widen, forcing more residents to leave the area and weakening community cohesion.

Council response

The RLDP does already include a small number of targeted allocations outside of the Strategic Growth Area in sustainable settlements where a limited number of additional dwellings would be appropriate. The plan also provides the policy framework to allow new development and redevelopment within defined settlement boundaries, including minor rural settlements outside of the Strategic Growth Area, to be delivered (Policy SSC1) and affordable housing exceptions sites (Policy HG5).

7211 – Plimmer – Object

The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations of Policy SP10 is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.

Council response

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

7213 – Street – Object

The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations

of Policy SP10 is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.

Council response

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

SP2 - SETTLEMENT HIERACHY

A total of 23 duly made representations (6 support, 5 comments, 12 objections) were received in respect of Policy SP2 Settlement Hierarchy.

Objections centred on the distribution of growth, the justification for settlement classifications, and the flexibility of the policy framework.

Representations were made in respect of the levels of growth being overly concentrated in certain locations, particularly Barry and Rhoose, placing pressure on infrastructure and services while overlooking opportunities in other higher-order or primary settlements. Similarly, representors raised concerns that the lack of allocations or limited growth identified in primary settlements within the Strategic Growth Area undermined the RLDP spatial strategy.

Objections were raised in respect of the designation of Wick as a Primary Settlement, which objectors considered was contrary to the evidence base. Other objections were raised in respect of Minor Rural Settlements and the absence of housing allocations in this tier of the settlement hierarchy with objectors highlighting that this does not adequately reflect the role these communities can play in accommodating proportionate growth and responding to affordable housing need.

Due to the range of individual issues that were raised, each representation has been addressed individually.

STATUTORY CONSULTEE RESPONSES

5115 Welsh Government (Planning Division)

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.

Council Response

The Council welcomes the WG's comments, which confirm that the scale and distribution of growth are appropriate in the context of the settlement hierarchy. The comments regarding Culverhouse Cross and Wick are noted.

INDIVIDUAL RESPONSES

SUPPORT

5702 - Cardiff Capital Region Energy - Support

CCR Energy welcomes the recognition of St Athan and Rhoose as Primary Settlements within the Vale of Glamorgan's Strategic Growth Area. The designation reflects their strong range of services, facilities, and strategic location, supporting sustainable employment growth. The proposed redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park complements this approach, creating high-quality employment and innovation opportunities. Combined with proximity to Cardiff Airport, the Bro Tathan Enterprise Zone, and planned transport improvements, these settlements are well placed to accommodate growth, support regional economic development, and enhance connectivity, skills, and prosperity within the Vale.

Council Response

Support is noted.

6737- Hallam Land Management (Savills) - Support

Hallam is generally supportive of this policy. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Council Response

Support is noted.

6765- Persimmon Homes (Boyer Planning) - Support

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement. Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre.

Council Response

Support is noted.

7097 - Barratt Redrow Homes (Turley)

The identification of St Athan as a 'Primary Settlement' is supported.

Council Response

Support is noted.

7187 - H Jones, L Sungur and P John (Herbert R Thomas)

Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units).

Council Response

Support is noted.

COMMENTS/OBJECTIONS

4862 – Reed - Object

The role of Rhoose is over stated and more development should be concentrated in Barry and the Service settlements. For example Llantwit Major has many opportunities with excellent services (Rhoose residents have to travel there for some services) yet it is not taking significant housing building for political reasons. More opportunities therefore need to be found in Llantwit Major as well as the other higher order settlements. The candidate sites show that there are opportunities.

Suggested Change

Sites to be identified via a better candidate site process concentrating on requesting opportunities in higher order settlements reducing the need for Rhoose to take an additional 800 units plus at Rhoose Point and Readers Way over the next 10 years. The site to the east of Barry should be reinstated and documents made public to the Inspector as to why it did not proceed.

Council Response

To inform the RLDP, the Council has undertaken a review of its originally settlement appraisal which was first carried out in 2016 for the adopted LDP. Further detail on the methodology and ranking of settlements is set out in BP5 Settlement Appraisal Review.

In respect of Rhoose, the adopted LDP appraisal identified Rhoose as being a Primary Settlement, and following the review for the RLDP, Rhoose has remained a Primary

Settlement, reflecting the availability of services such a primary school, small convenience shops, food and drink outlets, some small-scale employment provision and public transport with both rail and bus services.

In respect of comments regarding the distribution of housing, the categorisation of settlements has been undertaken separately from the assessment of site allocations, as clearly set out in the settlement appraisal methodology. The assessment of candidate sites are detailed in BP18A Candidate Site Assessment Deposit Plan Stage.

The identification of settlements within the settlement hierarchy is based up their role and function as detailed within the settlements review and the availability of land is not a factor in the identification of the settlement hierarchy.

With regards to Llantwit Major, three allocations totally 475 units are identified in the RLDP (Sites A, B and C on the Northern Access Road) alongside a housing led redevelopment opportunity at Eagleswell. It is therefore considered that Llantwit Major is already making sufficient provision for new housing.

With regards to the request to reinstate Land to North East Barry, which was originally identified as a Key Site at the Preferred Strategy stage, the Council's justification for excluding this site within the Deposit Plan is detailed in the Housing Growth in Barry consultation document (June 2025). This states that due to deliverability issues associated with different land ownership, the Council determined that it would not be appropriate to carry the site North East of Barry forward as an allocation in the Deposit RLDP. It should also be noted that following its exclusion by the Council, the site promoters of North East Barry have not sought to pursue the site as a housing allocation during the consultation of the Deposit Plan. It is therefore not a realistic alternative site.

5378 – G Thomas - Object
5393 – C Thomas - Object

The reclassification of Wick as a Primary Settlement appears unjustified when considered against the settlement hierarchy and the characteristics normally associated with settlements expected to accommodate a greater proportion of growth. The evidence base provides limited explanation for this change and does not clearly demonstrate that Wick performs a significantly greater service role or has materially better accessibility, infrastructure, or employment opportunities than comparable nearby villages such as St Brides Major, which remains classified as a Minor Rural Settlement despite appearing to have a broadly similar level of local facilities.

For example, although Wick has scored 'higher' than St Brides Major in several categories due to it being 'closer' to other amenities such as a train station, in reality this equates to only a few extra minutes by car or bus (noting they are served by the same bus route) as the difference is barely 3 miles along a winding national speed limit road with no footpaths (and

thus not safely walkable or cyclable), as is the onward journey between Wick and Llantwit Major; travelling via the National Cycle Route through St Donat's would take the journey over the 5 mile scoring threshold for Wick. Thus, in practical terms the difference is negligible, and, in fact, St Brides lies geographically closer to Bridgend rail station which has a far greater service provision than Llantwit Major.

This objection is not intended to suggest that St Brides's Major should also be a Primary Settlement, but to argue that by comparison, Wick should not be reclassified. Without clear evidence that Wick functions as a wider service centre or offers greater sustainability credentials, its reclassification risks being inconsistent with the plan's spatial strategy of directing development toward the most sustainable and well-served locations.

Suggested Change

Wick should remain classified as a Minor Rural Settlement.

Council Response

To inform the RLDP, the Council has undertaken a review of its originally settlement appraisal which was first carried out in 2016 for the adopted LDP. Further detail on the methodology and ranking of settlements is set out in BP5 Settlement Appraisal Review. It is important to note that since the adopted LDP evidence base was prepared a regional methodology has been developed by the 10 local authorities that form the South East Wales Strategic Planning Group (SEWSPG), establishing a common methodology for settlement appraisals. The Council has used an adapted version of this to assess settlements. The assessment is based upon three principles:

- Principle 1 – The level of sustainable transport and accessibility in and around settlements.
- Principle 2 – The availability of local facilities and services in and around settlements. Principle 3 – The level of employment opportunities in and around settlements.

The identification of settlements within the settlement hierarchy is based up their role and function as detailed within the settlements review and the availability of land is not a factor in the identification of the settlement hierarchy.

The review has resulted in changes in the ranking of settlements, including several settlements being recategorised, namely Culverhouse Cross and Wick have changed to Primary Settlements (previously Minor Rural Settlements), whilst Southerndown has been reclassified from a minor rural settlement to a smaller rural settlement.

In ranking settlements, the appraisal acknowledges that within each settlement category there are differences between each settlement (as reflected in the ranking and scoring). Nevertheless, the appraisal considers that the services, facilities and linkages within each settlement reflects their settlement category when assessed against the methodology, which

has been applied consistently across all settlements including the recategorising of Wick as a Primary Settlement.

The settlement hierarchy should also be considered in the context of the strategy. Whilst Wick is defined as a primary settlement, it is also located outside of the strategic growth area and as such new allocations are limited to small scale affordable housing led developments. The only difference in strategy terms between a minor rural settlement and a primary settlement outside of the strategic growth area is the scale of affordable housing led allocations that would be acceptable in principle, with a threshold set for 25 units in minor rural settlements and 50 units in primary settlements.

5815 – Hart - Object

If Barry is already the largest town in the vale it doesn't need to be made any larger.

Suggested change

The number/size of housing developments in Barry should be reduced.

Council Response

Barry is identified as a key settlement within the settlement hierarchy. As the main administrative town, there is an expectation that it will accommodate future growth, reflecting its role in providing strong transport connectivity, services, employment opportunities, retail provision and leisure facilities for both its residents and the wider area. It is also the area with the highest identified need for affordable housing.

Whilst concerns regarding the further expansion of Barry are noted, the proposed housing allocations within the town would deliver much-needed housing, including affordable homes to help address the identified need.

6006 - Barratt Redrow Homes (Lichfields) - Object

Policy SP2 lists Colwinston as a “Minor Rural Settlement” in the settlement hierarchy. Policy SP2 also states that:

“For the purposes of this policy small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of up to 25 dwellings in Minor Rural Settlements or up to 50 dwellings in Primary Settlements. The type, scale and mix of affordable housing will be expected to reflect the latest evidence, including specialist older person housing. Proposals which do not meet the minimum 50% affordable housing provision will not be supported.”

The RLDP seeks a high proportion of affordable homes alongside other overly prescriptive policies relating to net zero carbon emissions from new dwellings, residential density, and open space provision. In order to achieve these objectives in a deliverable and sustainable way, it is essential that the RLDP provides sufficient flexibility in both policy application and

housing mix. Without such flexibility, the cumulative impact of multiple prescriptive requirements risks undermining site viability. A balanced approach is therefore necessary to ensure that the Council's housing, climate, and place making ambitions can be realised without constraining the delivery of much needed homes.

Policy SP2 requires on-site provision of 50% affordable homes on all new sites in Minor Rural and Primary Settlements. Policy SP2 as drafted also limits maximum dwelling numbers to sites of 25 dwellings in Minor Rural Settlements and up to 50 swellings in Primary Settlements. There are a number of concerns with this approach as drafted:

1. Whilst it is understood that it is a core RLDP objective to deliver much needed affordable homes in VoG, Policy SP2 must incorporate sufficient flexibility to allow for viability considerations to be taken into account. Whilst it is understood that the sites proposed for allocation in the RLDP will have provided a Viability Assessment demonstrating that they can be delivered, there is a need to be cautious. Additional policy burdens (e.g. those relating to net zero carbon operational development) could go beyond what has been tested at RLDP preparation stage. Without an explicit mechanism to consider viability, the delivery of entire allocations, both market and affordable housing across the Minor Rural and Primary Settlements, could be jeopardised unintentionally. The blanket approach to the 50% affordable housing requirement across site allocations fails to consider the unique technical complexities of each individual allocation that are required to be overcome before sites can be delivered. This is in direct contrast to PPW paragraph 4.2.32 which states that:

"When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable."

2. The upper limits of 25 and 50 dwellings for Primary and Minor Rural Settlements respectively are arbitrary and unevidenced. Given the identified need for housing and affordable housing as set out in our comments to Policy SP1, allocated Rural Affordable Housing-Led Sites that have limited constraints (e.g. Allocation HG4(1)) should be allowed to be expanded and accommodate further dwelling numbers should the sites be suitable to allow this. Each site should be considered on its own merit rather than having a 25 unit limit applied as a matter of course.

Allocation HG4(1) is located in the HMA of Llandow. Table 5 of the Draft Local Housing Market Assessment 2023 Summary Note Evidence Base Document provides an estimate of the overall additional affordable housing need from 2023 to 2038 as being 52 units per annum which is significantly more than what is proposed for allocation. It is also worth noting that Registered Social Landlords will prefer to have a higher number of affordable units under their management in a particular location to ensure efficiencies in management and operation.

3. Land to the East of Colwinston (HG4(1)) is allocated for 25 dwellings with a minimum provision of 50% on-site affordable housing. As 50% of 25 is 12.5 dwellings, this would need to be rounded up to 13. As such, allocation HG4(1) is required to provide a minimum of 52% on-site affordable housing. As a minimum, allocation HG4(1) should be allowed to provide 26 dwellings so that the "minimum" on-site provision of 50% set out by Policy SP2 is truly a minimum.

Suggested Change

The consideration of viability and the removal of the arbitrary upper limits on site sizes for allocations in Primary and Minor Rural Settlements will ensure that Policy SP2 meets the third test of soundness (Will the Plan deliver?). The proposed amendment to the wording of Policy SP2 is as follows:

"For the purposes of this policy small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of circa 25 dwellings in Minor Rural Settlements or circa 50 dwellings in Primary Settlements. The type, scale and mix of affordable housing will be expected to reflect the latest evidence, including specialist older person housing. Proposals which do not meet the minimum 50% affordable housing provision will not be supported."

Council Response

Comments are noted. The site capacity thresholds for affordable housing in Primary and Minor Rural Settlements are considered appropriate, reflecting the RLDP strategy's focus on concentrating housing delivery within settlements located in the sustainable growth strategy area, while facilitating modest-scale affordable and market housing development within settlements outside that area.

The identification of site thresholds provides clarity regarding the scale of housing development that would be considered acceptable within Primary and Minor Rural Settlements, having regard to the characteristics of individual settlements within these categories.

In respect of calculating and achieving an equal 50% split between market and affordable homes on sites of 25 dwellings, Policy SP2 indicates that the 50% affordable housing requirement is a minimum rather than an absolute figure. Consequently, a rounded figure of 52% affordable housing would be acceptable.

With regard to the viability of affordable housing-led sites identified under Policy HG4, each site promoter has submitted viability evidence demonstrating that the site can accommodate a minimum of 50% affordable housing. These assessments have also factored in the delivery of net zero homes as an integral requirement of the development.

The Development Plans Manual states "*For those sites key to delivering the plan's strategy, it will be necessary to demonstrate that they can be delivered through consideration of more*

detailed costs, constraints and site-specific requirements. Only in exceptional circumstances should further viability appraisals be undertaken at the planning application stage."

The representor is the site promoter of the affordable housing-led site in Colwinston and has submitted a detailed viability appraisal demonstrating that 52% affordable housing can be achieved. This assessment is based on a layout that takes into account density, open space provision and other policy requirements, including net zero standards. The findings of this assessment are summarised within BP42: Viability Assessment.

If the information submitted by the site promoter to the Council is robust, there should be no requirement for additional flexibility to be built into the policy.

6014 – Williams - Comment

Rhoose has been identified as a Primary Settlement, reflecting the range of services and facilities available. The current services and facilities are insufficient for the size that the village has now grown into. New housing developments have, in the past, failed in their commitment to provide shops and community spaces – the Rhoose Point development is a case in point – land defined for facilities lay undeveloped for years and then housing was built on it. Transparency and accountability by the council is essential if 'contribution towards' replaces actual provision.

Council Response

To inform the RLDP, the Council has undertaken a review of its originally settlement appraisal which was first carried out in 2016 for the adopted LDP. Further detail on the methodology and ranking of settlements is set out in BP5 Settlement Appraisal Review.

In respect of Rhoose, the adopted LDP appraisal identified Rhoose as being a Primary Settlement, and following the review for the RLDP, Rhoose has remained a Primary Settlement, reflecting the availability of services such a primary school, small convenience shops, food and drink outlets, some small-scale employment provision and public transport with both rail and bus services.

The comments regarding community facilities not being delivered as part of previous housing developments are noted. The development in question (Rhoose Point) was brought forward under a previous development plan framework and current mechanisms for securing appropriate planning obligations are now more stringent. The RLDP sets out the site-specific requirements for the key site at Readers Way in Rhoose and there will be an expectation that these will be delivered.

6615 – Taylor - Object

Social Farms & Gardens urge the Vale of Glamorgan Council to protect existing and potential food growing sites, particularly high-grade agricultural land, which should be safeguarded for sustainable agriculture. Poor development opportunities (high grade agricultural land) near

Culverhouse Cross and Wenvoe should not be seen as a threat but as an opportunity to preserve land for food growing. We recommend including policies that support food growing enterprises, acknowledging various types of initiatives beyond allotments. Greenfield land should be reserved for horticulture, and proposals encouraging such enterprises and structures should be actively promoted to enhance local food production.

Council Response

Comments are noted. The RLDP has sought to avoid the loss of Best and Most Versatile (BMV) agricultural land through its assessment of candidate sites, recognising the importance of safeguarding such land for agricultural use in accordance with national planning policy requirements.

The identification of BMV land at Culverhouse Cross and Wenvoe highlights the constraints associated with development within these settlements rather than indicating a threat to such land. As such, the designation and protection of BMV land inherently supports its continued use for agricultural purposes.

In addition, the Plan provides opportunities for rural diversification through Policy EMP6: New Rural Diversification and Employment Uses in the Countryside.

6174 – Tipples - Object

Barry may be the largest town in the Vale, however, the infrastructure can't handle anymore. The people of Barry feel like we are living in a giant housing estate, the amenities don't match the size of the town. Yet, now it's going to increase further. The schools are full, already having to turn away pupils, surgeries are full, Holton Road is not fit for purpose, you have to travel to Cardiff for any decent shops.

Suggested Change

No need to build more housing in Barry, look further afield within the Vale.

Council Response

Barry is identified as a key settlement within the settlement hierarchy. As the main administrative town, there is an expectation that it will accommodate future growth, reflecting its role in providing strong transport connectivity, services, employment opportunities, retail provision and leisure facilities for both its residents and the wider area. It is also the area with the highest identified need for affordable housing.

Whilst concerns regarding the further expansion of Barry are noted, the proposed housing allocations within the town would deliver much-needed housing, including affordable homes to help address the identified need.

The Council acknowledges that new development may require the provision of additional supporting infrastructure to mitigate any impacts arising from development. In preparing the

Deposit Plan, the Council has undertaken an assessment of the likely impacts of the proposed allocations. The Infrastructure Plan accompanying the Deposit RLDP sets out the infrastructure requirements for each site, and these requirements are reflected in the Deposit Plan policies. The cost of providing this infrastructure has been incorporated into site-specific viability assessments to ensure that the requirements can be supported by development, as set out in Background Paper 42A: Independent Financial Viability Assessments of Key Sites.

In respect of educational provision, the Council has undertaken an assessment of the educational needs generated by the proposed sites, including forecast requirements for nursery, primary and secondary school places (BP43 Education). In preparing the Deposit Plan, the Council has also worked closely with the Cardiff and Vale University Health Board (UHB) to identify the potential demands that new development and forecast population growth may place on health services across the Vale of Glamorgan over the plan period to 2036. This has involved the UHB reviewing existing capacity and service demand, assessing the likely demand for health services arising from population and demographic changes over the plan period, and considering the potential impacts on health services resulting from the allocation of key housing sites within the Deposit Plan. This assessment is set out in Background Paper BP37: Primary, Community and Intermediate Health Care.

6325 - **Penllyn Community Council - Object**

I note that the Deposit RLDP shows no new housing sites in the Penllyn area, though some communities are classified as 'Minor Rural Settlement Areas' and should be eligible for infill and affordable housing. Many rural communities, especially hamlets, are regarded as 'Countryside' without defined boundaries, which restricts their access to community-supported, affordable micro or single-unit developments. The current policies, particularly SSC1 and HG5, exclude around 54 rural communities from such development, contradicting the strategic objectives to support rural housing needs and the Well being of Future Generations Act (Wales)

Suggested Change

We appreciate the necessity to generating a Settlement Hierarchy and the need to ensure development is controlled in a manner suitable for each level within that. However, we would suggest the conflicts this generates with the overarching Objectives in respect of Sustainable Communities, the Wellbeing of the older and young persons and the wishes of the local communities, can be relatively simply addressed by either:

1. Providing a defined settlement boundary for ALL settlements including 'Hamlets and Smaller Rural Settlements'

The proposed planning polices and constraints notably those in SSC1 and HG5 could then be applied across all existing settlements and communities to allow for appropriate

development of affordable homes to meet the aspirations of Para 5.24 and the local Community.

Council Response

The RLDP strategy identifies a strategic growth area within which future development will be directed. This growth area contains the Vale's largest settlements, which are considered to provide good access to services, facilities and public transport. Outside the growth area, the Plan identifies a hierarchy of larger rural settlements that are defined by settlement boundaries and within which small-scale development, alongside affordable housing exception schemes, may be considered appropriate, depending on the scale and location of the proposal.

Collectively, the strategy seeks to accommodate the majority of housing growth within the Vale's largest settlements while allowing for more limited levels of growth in rural areas. Elsewhere, the Vale contains a range of small settlements and hamlets which, by their nature, offer limited services and facilities and often have limited or no public transport provision. From a policy perspective, the allocation of new housing in these locations would not represent a sustainable form of development, as residents would be reliant on other settlements to meet their day-to-day needs.

In areas with limited public transport and no active travel connections, this would inevitably increase the number of car-borne trips, contrary to national planning policy objectives. The inclusion of settlement boundaries around these settlements would elevate their status, as the purpose of a settlement boundary is to define the area within which development would normally be considered acceptable. However, within these small hamlets located in the countryside, local and national planning policy generally considers new development to be inappropriate unless it falls within the categories of development specified in Policy SP3, such as the conversion of existing buildings.

6819 - Fairweather (Boyer Planning)

The importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan. Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to St Nicholas under Policy SP2 is not justified. Clearly there continues to be a disconnect between the identified role and function of St Nicholas, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements.

Council Response

The identification of settlements within the settlement hierarchy is based on their role and function, as detailed in the Settlement Appraisal Review, and the availability of land has not been a factor in either the identification of settlements or their position within the hierarchy. In this regard, the absence of housing allocations within a settlement does not undermine its role or function.

Site allocations within individual settlements have been considered on their own merits, having regard to a range of relevant factors. Comparisons between the number of dwellings proposed in one settlement and those proposed in another do not take account of each settlement's capacity to accommodate additional development, including its physical, environmental and infrastructure characteristics, as well as any site-specific constraints.

In relation to St Nicholas, candidate sites submitted for consideration have been assessed by the Council, and the reasons for their inclusion or exclusion are set out in the Council's Background Paper BP18A.

6845 - Taylor Wimpey (Savills) - Comment

Taylor Wimpey supports the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents.

Taylor Wimpey concurs with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Council Response

The Council notes the support expressed for the Council's Settlement Appraisal Review and its findings. In this regard, the spatial growth strategy and housing allocations have been made in accordance with the outcomes of the settlement review, taking into account opportunities for growth and constraints to development within the settlements identified in the hierarchy.

It is incorrect to state that no new growth is proposed in Sully, as Land at Swanbridge Road (175 dwellings) is included within the housing land bank and is identified as an existing housing commitment under Policy HG1.

In respect of additional housing allocations in settlements where no housing allocations have been proposed, any candidate sites submitted within these settlements have been assessed by the Council. The reasons for their inclusion or exclusion are set out in the Council's Background Paper BP18A.

The identification of settlements within the settlement hierarchy is based on their role and function, as detailed in the Settlement Appraisal Review. The availability of land is not a factor in the identification of settlements or in determining their position within the hierarchy.

6859 - Raymond (Boyer Planning) - Comment

Support for the identification of Colwinston as a Minor Rural Settlement and acknowledgement of its capacity to accommodate proportionate and sustainable growth. However, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as Colwinston, should be subject to such constrained growth.

There continues to be a disconnect between the identified role and function of Colwinston, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. A modest allocation in Colwinston (Candidate Site 409) would represent proportionate growth that reflects the scale and character of the settlement. The current approach within Policy SP2 risks constraining flexibility within the spatial strategy and limiting opportunities to support sustainable rural communities.

Council Response

The Council notes the support for the identification of Colwinston as a Minor Rural Settlement. The identification of settlements within the settlement hierarchy is based on their role and function, as detailed in the Settlement Appraisal Review, and the availability of land has not been a factor in either the identification of settlements or their position within the hierarchy. In this regard, the absence of housing allocations within a settlement does not undermine its role or function.

Site allocations within individual settlements have been considered on their own merits, having regard to a range of relevant factors. Comparisons between the number of dwellings proposed in one settlement and those proposed in another do not take account of each settlement's capacity to accommodate additional development, including its physical, environmental and infrastructure characteristics, as well as any site-specific constraints.

In relation to Colwinston, candidate sites submitted for consideration have been assessed by the Council, and the reasons for their inclusion or exclusion are set out in the Council's

Background Paper BP18A. An affordable housing led site has been allocated within Colwinston.

6894 - Catesby Estates (Turley) – Comment

Policy SP2 – Settlement Hierarchy broadly distributes development in line with the hierarchy of settlements, reflecting the role and function of places and directing growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision.

Llandow is identified as a Minor Rural Settlement, new development associated with which should be mainly limited to infill opportunities and small-scale affordable housing led schemes (sites of up to 25 dwellings with a minimum of 50% affordable provision). Catesby would suggest that specific sites in and around all settlement types may be suitable for a greater level of development than that suggested by the settlement hierarchy, and these should be explored accordingly.

As part of this, Catesby SUPPORTS the recognition in the Policy Framework that the existing services and facilities in and around the Minor Rural Settlements should be safeguarded, supported and enhanced, and that in order to do this, growth should still be balanced in a way which supports these rural communities (Paras 6.16 and 6.17).

Suggested Change

Catesby would suggest that specific sites in and around all settlement types may be suitable for a greater level of development than that suggested by the settlement hierarchy, and these should be explored accordingly.

Council Response

The Council notes the support for the policy framework, settlement hierarchy and the identification of Llandow as a Minor Rural Settlement within the hierarchy. The spatial growth strategy and housing allocations have been prepared in accordance with the findings of the Settlement Appraisal Review. The assessment is based upon three principles:

- Principle 1 – The level of sustainable transport and accessibility in and around settlements.
- Principle 2 – The availability of local facilities and services in and around settlements. Principle 3 – The level of employment opportunities in and around settlements.

The identification of settlements within the settlement hierarchy is based up their role and function as detailed within the settlements review and the availability of land is not a factor in the identification of the settlement hierarchy.

In respect of additional housing allocations in settlements where no housing allocations have been proposed, candidate sites submitted within these settlements have been assessed by

the Council, and the reasons for their inclusion or exclusion are set out in the Council's Background Paper BP18A.

The identification of settlements within the settlement hierarchy is based on their role and function, as detailed in the Settlement Appraisal Review. The availability of land is not a factor in either the identification of settlements or the determination of their position within the hierarchy.

6898 - Barratt Redrow Homes (Boyer Planning) - Object

In principle, Barratt Redrow supports the Settlement Pattern set out in the Deposit Plan, particularly the identification of Wenvoe as a Primary Settlement. Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

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

Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified. With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge'. Barratt Redrow do not consider this to be sufficient justification.

Council Response

Council notes support for the Council's policy framework and settlement hierarchy and the identification of Wenvoe within the hierarchy as a primary settlement.

The supporting text for the policy explains why Wenvoe is identified as a primary settlement but has been excluded from the strategic growth area. with paragraph 6.12 stating that Wenvoe (alongside Wick and Culverhouse Cross) is "not considered to be locations where substantial additional growth would be appropriate." The plan clarifies that the settlement meets the threshold for being defined a primary settlement due to the services and amenities it has, but when constraints are considered, development opportunities in Wenvoe are significantly limited by the presence of BMV land on the edge of the settlement.

National planning policy is clear how BMV land should be considered through the development plan process, stating that "when preparing development plans and considering

planning applications, planning authorities should consider the quality of agricultural land and other agricultural factors and seek to minimise any adverse effects on the environment."

This approach is supported by Welsh Government in their Deposit RLDP representation, where they state that "*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.*"

7015 - Lidl GB Limited (Carney Sweeney)

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application).

The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation.

By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs.

Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3.

Council Response

Comments are noted. As highlighted in the supporting text of RLDP Policy SP12, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2.

Irrespective of the outcome of the application, the Council does not consider the site to represent a logical extension to the settlement boundary. The site is physically separated from the Llantwit Major settlement boundary by the B4265 and from the Llanmaes settlement boundary by a substantial area of open countryside. Additionally, the site is not

allocated for residential development and, in line with the Council's established approach, non-residential uses have not been automatically included within settlement boundaries if they do not represent a logical extension to the existing settlement boundary.

If planning permission were granted, the site's location beyond the existing settlement boundary would not preclude development, nor would it be treated as open countryside as the site would be specifically allocated for that use within the Plan. Therefore, the Council considers that no change is required to the Plan.

7059 - Barratt Redrow Homes (Highlight Planning)

Barratt Redrow objects to Policy SP2 in its current form. The policy framework remains highly restrictive and the approach towards Minor Rural Settlements is considered to be too blunt and is not justified by evidence.

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.

Council Response

The RLDP is clear that the strategy seeks to focus development within the Strategic Growth Area, comprising those settlements that are considered the most sustainable. Limited growth may be appropriate within the more sustainable Minor Rural Settlements; however, this is restricted to affordable housing-led development.

The suggested amendment would require a fundamental change to the strategy, which is not considered appropriate, as it would not accord with national planning policy, which seeks to direct development to the most sustainable locations.

7188 - H Jones, L Sungur and P John (Herbert R Thomas)

The limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case-by-case basis. The provision of an increased number of units in the Primary Non-SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale.

Council Response

The site capacity thresholds for affordable housing in Primary and Minor Rural Settlements are considered appropriate, reflecting the RLDP strategy's focus on concentrating housing delivery within settlements located in the sustainable growth strategy area, while facilitating modest-scale affordable and market housing development within settlements outside that area.

The identification of site thresholds provides clarity regarding the scale of housing development that would be considered acceptable within Primary and Minor Rural

Settlements, having regard to the characteristics of individual settlements within these categories.

SP3 – DEVELOPMENT IN THE COUNTRYSIDE

A total of 6 duly made representations were made in respect of the Policy SP3 (3 comments, 3 objections). The key issues raised are consultation with the Police, the approach to development in hamlets and smaller rural settlements and the allocation of land for retail in the countryside, the need to include policies to safeguard land and encourage food production and the need for further guidance on rural enterprise dwellings for small scale horticulture.

The representations made on Policy SP3 are summarised below and an individual response has been provided for each issue raised.

STATUTORY CONSULTEE RESPONSES

6631 – South Wales Police – Secured by Design Officer – Comment

Where developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.

Council Response

Comments are noted. South Wales Police is a statutory consultee, and the Council will continue to consult with the Designing Out Crime Officer on appropriate planning applications.

6328 – Penllyn Community Council (Clerk) – Object

Provide additional or amended Planning policies [either free standing or within SP3 or HG5] to allow for single unit/micro development, by companies or individuals, of appropriate, affordable housing units within all communities including 'Hamlets and Smaller Rural Settlements' [in the Countryside] where this is supported by the local community and meets the requirements of SSC1.

These new/amended policy statements [alongside the existing requirements of SSC1 and HG5] could then be applied across all existing settlements and communities currently classified as undefined 'Hamlets and Smaller Rural Settlements' and hence 'Countryside' to allow for controlled appropriate development of affordable homes to meet the aspirations of Para 5.24. and the local Community.

Suggested Change

Same as above

Council Response

RLDP Policy SP2 identifies a settlement hierarchy and sets out that the broad distribution of development within the Strategic Growth Area will be shaped by this hierarchy, reflecting the role and function of places, and directing growth to locations that will provide the

greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision.

All settlements listed within the settlement hierarchy in SP2, both within and outside the Strategic Growth Area, will be afforded a settlement boundary. All other areas, including smaller rural villages and hamlets, outside of these defined settlement boundaries are regarded as 'countryside' under Policy SP3 unless specifically identified for other uses in the plan.

Policy HG5 allows for small-scale affordable housing development in areas outside settlement boundaries as 'exceptions' to the general housing policies of the RLDP. However, this applies only to proposals relating to settlements located outside the Strategic Growth Area and specifically identified in the settlement hierarchy under Policy SP2. This includes Minor Rural Settlements and the Primary Settlements of Wenvoe, Culverhouse Cross, and Wick. Exception sites will not be supported in smaller rural settlements or hamlets without a defined settlement boundary, as these locations generally lack the services and facilities necessary to support new development.

Policy SP3 does allow for the redevelopment or extension of existing dwellings, to be considered against Policy HG9. Replacement dwellings, residential extensions and the provision of annexed accommodation account for a moderate proportion of all new development in the Vale. In a countryside location it is important that such proposals are well-designed since excessively large and poorly designed proposals can individually, and cumulatively, damage both the character of the property and the local landscape. Policy HG9 therefore sets out the criteria against which determining such proposals within a countryside setting will be assessed.

New development should reflect and support the role and function of the Vale's settlements and communities, assisting placemaking and encouraging and facilitating the use of sustainable transport. Failure to respect the scale and function of places can lead to inappropriate development and result in unsustainable patterns of transportation, loss of environmental quality and local character, reduced economic prosperity and hinder social inclusion and the creation of balanced communities. The Council does not support the inclusion or amendment of policies that would allow new development beyond the criteria set out in Policy SP3, as this would be contrary to the established spatial strategy and inappropriate for hamlets and smaller rural settlements. Therefore, no change is required to the plan.

INDIVIDUAL RESPONSES

COMMENTS AND OBJECTIONS

6194 – Taylor – Object

SF&G recognise the importance of green wedges and other countryside land, for food production and suggest safeguarding land accordingly, aligned with housing growth. Our communities face challenges like poor health, climate change, and inequality, with a fragile food system vulnerable to shocks. The Welsh Government Community Food Strategy (2025) aims to develop diverse local food networks that work with nature not against it. Supportive

policies are needed for small-scale horticultural farms to enable essential infrastructure, moving away from strict scrutiny and towards recognising genuinely necessary structures for agriculture, ensuring resilient and sustainable local food businesses.

Suggested Change

Include policies to safeguard land and encourage food production especially horticulture - recognising the need for encouragement for small scale food production farms which add to food security and enhance biodiversity.

Council Response

Comments are noted. PPW supports the protection of agricultural land, sustainable food systems and local food production as part of its broader placemaking, climate change and rural economy objectives. These objectives are reflected in RLDP Policy SP19: Green Infrastructure. Under this policy, development proposals must meet a series of criteria designed to protect, enhance and incorporate high-quality, multifunctional green infrastructure. The policy recognises that the delivery of multifunctional green infrastructure is fundamental to creating an integrated and resilient green infrastructure network. Such provision should create cohesive spaces that enhance local food production as well as a wide range of environmental, social and economic benefits.

Consultation on the Council's Draft Green Infrastructure (GI) Strategy was undertaken alongside the Deposit Plan. The Strategy identifies food production as a component of the green infrastructure network and includes specific references to its role in delivering the strategic objectives. In particular, it supports the delivery of Objective 1 through:

"Improving access to growing spaces to support the community growing initiatives and local food production and increasing the multifunctionality of green spaces to include spaces for growing food, including on new development sites."

Furthermore, it contributes to the delivery of Objective 3 by:

"Reducing emissions associated with food and farming by supporting local food production."

Food production is therefore recognised as an asset of multifunctional GI and supported within the RLDP policy framework and the Green Infrastructure Strategy.

No change is required to the plan.

6202 – Taylor – Comment

Due to the outdated nature of TAN 6 it is incumbent on local authorities to include more up to date policy in their local development plans. We know Wales is not producing enough fruit and vegetables to feed ourselves in the future when we are likely to need it. Social Farms & Gardens is very concerned that Technical Advice Note 6 – Planning for Sustainable Rural Communities is considerably out of date (July 2010) and no longer delivering sustainable rural communities. It therefore falls on local authorities delivering replacement local development plan, to consider the latest evidence, trends, previous decisions and

other written approaches. The Practice Guidance on Rural Enterprise Dwellings, although only considered an exemplar approach, has the potential to be used too prescriptively and in a way that is out of line with the needs of our rural economy and communities, especially given the climate and nature emergencies that have been declared. We ask the Vale of Glamorgan Council to consider adopting planning guidance on Rural Enterprise Dwellings for horticulture - like Powys Council have done. This guidance can be more or less copied from Powys version like Bannau Brynchieniog have done. Therefore, it is important that the RLDP provides positive wording in policies to encourage development in association horticultural enterprises including rural enterprise dwellings. We have an abundance of evidence to support this approach and would be keen to collaborate on any potential wording or approaches.

Council Response

Comments are noted. TAN 6 defines rural enterprises as "land related businesses including agriculture, forestry and other activities that obtain their primary inputs from the site, such as the processing of agricultural, forestry and mineral products together with land management activities and support services (including agricultural contracting), tourism and leisure enterprises." TAN 6 provides guidance on how applications for rural enterprises should be considered.

Despite a significant part of the Vale being rural in character, the Council receives a low number of applications for rural enterprise dwellings and those that have been received are related to larger scale farming businesses rather than small scale horticulture. Those applications that have been received have been assessed against the detailed requirements set out in national planning policy (TAN 6 and PPW).

The Powys guidance that the representor refers to relates only to rural enterprise dwellings in relation to smaller scale horticultural enterprises rather than rural enterprises more generally. This is a narrow focus and given the limited number of applications that the Council is likely to receive, it would not at present be an issue that would warrant the prioritisation of resources to prepare Supplementary Planning Guidance (SPG). Notwithstanding this, should circumstances change, it is considered that there are already sufficient policy hooks including in SP3, HG8 and EMP6 upon which SPG could be prepared. In light of this, the Council considers that no change is required to the plan.

6895 – Catesby Estates – Comment

Policy SP3 – Development in the Countryside is clear that development will only be permitted in the countryside where it falls within one of the specified uses. This only includes Affordable Housing Exception Sites in respect of housing development. Catesby suggests that further development sites are required across the Vale in order to meet the Council's housing requirement, which should consider locations within the countryside where appropriate.

Catesby reiterates that the co-location of housing with existing infrastructure and facilities will be crucial to achieving the overall Growth Strategy of the RLDP. Development in and

adjacent to Minor Rural Settlements is also key to this, especially those located in proximity to the 'Connectivity' corridor on the Key Diagram.

Catesby SUPPORTS development within these locations, particularly at Llandow. This is key in order for the Vale of Glamorgan to achieve part of its overarching vision, which states that "growth within rural settlements has provided for the needs of residents and supports balanced multi-generational communities that contribute to the vibrancy of the rural area".

Suggested Change

Catesby suggests that further development sites are required across the Vale in order to meet the Council's housing requirement, which should consider locations within the countryside where appropriate.

Catesby reiterates that the co-location of housing with existing infrastructure and facilities will be crucial to achieving the overall Growth Strategy of the RLDP. Development in and adjacent to Minor Rural Settlements is also key to this, especially those located in proximity to the 'Connectivity' corridor on the Key Diagram.

Council Response

Comments are noted. The housing growth proposed in the RLDP fully aligns with the Deposit Plan's Sustainable Growth Strategy, which seeks to focus development in the most sustainable locations within the Vale, consistent with the settlement hierarchy and with access to services, employment and transport networks. The Council does not consider that further development sites are required across the Vale to meet the Council's housing requirement and therefore no change is required to the plan. However, if additional land were to be required, the focus would be on sites within or adjoining existing sustainable settlements, not sites within the countryside, as supported by national planning policy.

7016 – Lidl GB Limited – Object

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application). The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below: See plan on attachment.

By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails

Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Council Response

Comments are noted. This representation has also been made in respect of SP2 and has been considered under that policy. As highlighted in the supporting text of RLDP Policy SP12, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2.

Irrespective of the outcome of the application, the Council does not consider the site to represent a logical extension to the settlement boundary. The site is physically separated from the Llantwit Major settlement boundary by the B4265 and from the Llanmaes settlement boundary by a substantial area of open countryside. Additionally, the site is not allocated for residential development and, in line with the Council's established approach, non-residential uses have not been automatically included within settlement boundaries if they do not represent a logical extension to the existing settlement boundary.

If planning permission were granted, the site's location beyond the existing settlement boundary would not preclude development, nor would it be treated as open countryside as the site would be specifically allocated for that use within the Plan. Therefore, the Council considers that no change is required to the Plan.

SSC1 – DEVELOPMENT WITHIN SETTLEMENT BOUNDARIES

A total of 6 duly made representations were made in respect of this Policy (3 support, 3 objections). The key issues raised were an objection to a specific change to the settlement boundary in Colwinston, concerns about the amendment to settlement boundaries where areas where previously included within a green wedge, and a suggested addition in respect of the protection of open space.

STATUTORY CONSULTEE RESPONSES

6965 – Dwr Cymru Welsh Water – Support

We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment.

Council Response

Support is noted.

INDIVIDUAL RESPONSES

SUPPORT

4863 – Reed - Support

Support the protection of open spaces within villages.

Council Response

Support is noted.

6772 – Persimmon Homes (Boyer Planning) - Support

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure.

Council Response

Support is noted.

COMMENTS/OBJECTIONS

5910 – Hart - Object

The new boundaries ignore the previously allocated green wedges. Green spaces to be kept free of development were identified previously and the whole concept of them has been ignored.

Suggested Change

The plan should honour previously identified green wedges.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of Green Wedge designations across the Vale of Glamorgan. Green Wedges are locally derived planning designations established through the development plan process and do not benefit from statutory protection in the same way as Green Belts. As such, they are plan-specific designations and are subject to review during the preparation of a replacement plan.

The RLDP identifies six Green Wedges for protection through Policy DNP2, the extent and location of which are illustrated on the Proposals Map.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period, as well as allocate land for affordable housing. Where sites have been identified through the candidate site process as suitable, available and achievable for development, they may be allocated within the RLDP, with Green Wedge boundaries adjusted accordingly. Settlement boundaries have therefore been amended where housing allocations are proposed within the Deposit RLDP.

All new allocations in the Deposit RLDP have been subject to the Council's site assessment process, while settlement boundaries have been reviewed in accordance with the methodology set out in Background Paper BP46. Green Wedges have not been disregarded through this process. Rather, following a comprehensive review, the Council has made informed judgements regarding those areas of land that continue to fulfil a Green Wedge function throughout the plan period.

6001 – Thomas - Object

VoGCC RLDP and Policy SSC1, BP46 Page 35, Item: Land at Rose Cottage, Colwinston, change ref.3, Type of change 1B.

No justification to change boundary here. Not rounding off. Impact on highway and the dangerous junction. The Property has been for sale for years and thus inclusion could result in further inappropriate development to an already expanded and converted small cottage if settlement boundary is changed. Impact on Conservation area. Impact on visual Amenities.

Suggested Change

Delete this Boundary change here as unnecessary and contradictions to VoGCC policies and methodology for Conservation areas.

Council Response

Land at Rose Cottage (change reference 3 within the Settlement Boundary Review (BP46)) relates to an amendment to the Colwinston settlement boundary to include the full curtilage of Rose Cottage. The change is proposed under Methodology Reference 1B, which seeks to

review existing settlement boundaries to ensure they logically follow curtilages where these have a functional relationship with existing dwellings.

The previous settlement boundary cut through both Rose Cottage and its curtilage, resulting in an illogical boundary that did not reflect the built form of the building or the existing extent of the settlement. It is considered that this proposed amendment addresses this issue by aligning the settlement boundary with the curtilage of an existing property, in accordance with the methodology referenced above.

As the suggested change involves only amending the settlement boundary to reflect the existing dwelling and its associated curtilage, it is not considered likely to result in any impacts on the local highway network or nearby junctions. The dwelling and its entire curtilage are already located within the Colwinston Conservation Area, and the revised boundary would ensure that the whole property is included within the settlement boundary, consistent with other properties within the Conservation Area.

The section of the cottage and garden being included are only visible from a short section of the adjacent lane. Therefore, it is considered that there would be no visual impact unless the owner of the property proposes development within the curtilage and garden of the cottage.

6123 – Taylor - Object

When referring to protecting open space there should be reference to protecting active community managed green spaces. Open spaces can be formal and informal but either way, their merits are just as valuable.

Suggested Change

Refer to the need to protect informal open spaces that have active community managed initiatives on site.

Council Response

Criterion 7 of Policy SSC1 states that development within settlement boundaries will not be permitted where it would result in the unacceptable loss of public open space, community or tourism buildings or facilities. The policy applies to all forms of public open space as defined in Annex B of Technical Advice Note (TAN) 16, including both formal and informal public open spaces, as well as those actively managed by local communities.

In addition, Policy CI2 Protection of Existing Open Spaces provides further detail regarding the protection of open spaces, stating that development will only be permitted where the site is demonstrated to have no significant value. Together, these policies provide a robust framework that protects valued open spaces across the Vale of Glamorgan through a criteria-based approach, without the need to specify each individual type of public open space, green space or site of significance to which the policies apply.

SP4 - PLACEMAKING

A total of 17 duly made representations (5 support, 3 comments, 9 objections) were received in respect of Policy SP4 on Placemaking.

The principles of the policy were supported by some representors. Comments and objections relating to Policy SP4 centred on the importance of incorporating Secured by Design principles into new developments, references to food production, concerns regarding higher-density development, and the extent to which community engagement should be required. Other comments related to the need for placemaking plans within specific communities and the necessity of placemaking statements, including their relationship with Design and Access Statements. Finally, concerns were raised regarding the potential impact of development on health and wellbeing.

STATUTORY CONSULTEE RESPONSES

6617 - South Wales Police – Secured by Design Officer - Comment

TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime. TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'

Policies that support the role of a Designing out Crime Officer and Secured by Design are as follows:

- Secured by Design (SBD)
- Planning Policy Wales (PPW)
- Technical Advice Note (TAN) 12: Design
- Section 17 of the Crime and Disorder Act 1998
- Violence against women and Girls
- The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public The Terrorism (protection of premises) Act 2025 (Martyn's Law)
- Standard Tier and Enhanced Tier
- Public Spaces

South Wales Police ask that all new developments are built to Secured by Design standards and that they work with The Vale of Glamorgan planning Department at the pre planning stage. It is important when designing roads and footpaths to maximise the benefits of

passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda.

Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred to the designing out crime at the pre planning stage. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises) Act 2025.

When planning parks and community space. Public consultation should take place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity). Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.

Council Response

The comments are noted. The South Wales Police Design Out Crime Officer is as a statutory consultee and is consulted on relevant planning applications. The RLDP recognises the importance of designing safe and inclusive spaces, as reflected within criterion 4 of Policy SP4 which states that development will be required to follow the placemaking principle of 'contributing to a vibrant, safe, and inclusive public realm'. Similarly, the Council's Draft Healthy Placemaking SPG which accompanied the Deposit RLDP contains a section on the importance of designing out crime.

6715 - Cardiff and Vale University Health Board - Comment

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping.

Opportunities for multifunctional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement.

Suggested Change

Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

“Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other opportunities for local food production as part of multifunctional green infrastructure.”

Council Response

The comments are noted. The matters contained within the suggested wording in respect incorporating spaces for food growing within developments are considered within the draft Healthy Placemaking SPG which includes a section on food growing. This provides detailed supplementary guidance for site developers when considering placemaking policies of the plan. The Council is therefore satisfied that this matter has been addressed.

6942 - Penarth Town Council – Support

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

Council Response

Support is noted.

7033 – Natural Resources Wales – Object

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.

Council response

The Council supports the proposed change to Policy SP4.

Proposed change

Amend criterion 9 of SP4 to read:

Protecting or enhancing the historic environment and its setting, **and the natural environment.**

INDIVIDUAL RESPONSES

<u>SUPPORT</u>

6773 - Persimmon Homes (Boyer Planning)

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

Council response

Support is noted.

6906 - Barratt Redrow Homes (Boyer Planning)

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

Council response

Support is noted.

7081 - Barratt Redrow Homes (Highlight Planning)

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.

Council response

Support is noted.

7098 - Barratt Redrow Homes (Turley)

We support the recognition that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.

Council response

Support is noted.

COMMENTS/OBJECTIONS

4864 - Reed - Object

Place making should happen in all settlements before major developments are permitted. This includes Rhoose. The community have not been involved in this plan rather told it is happening. Even comments made on the first drafts for Rhoose were reported as what the officer felt were the themes. Plan making needs to start from the bottom up not be enforced down for there to be local acceptance. Communities need to be heard. The drafts of this plan have not done that and regardless of comments no positive changes (except to increase housing numbers on the Readers Ways site to make the books balance!)

Suggested Change

Rhoose to have a place plan before any further development is approved.

Council Response

In preparing the RLDP, and following the publication of its Preferred Strategy, the Council held a series of non-statutory site-specific placemaking events within the settlements of the proposed Key Site allocations, including Rhoose. The Council held this session to provide residents a further opportunity to engage in the plan making process, enabling the community to provide views on initial site layout and highlight local specific issues associated with the proposed development. Placemaking reports for each of these sessions were published alongside the Deposit RLDP. The information provided by local community informed the indicative site layouts which are provided within the Deposit Plan.

The Council has worked with Town Councils and local residents to prepare Placemaking Plans for the four towns in the Vale - Barry, Penarth, Cowbridge and Llantwit Major. The development of Place Plans for other areas in the Vale of Glamorgan is outside the parameters of the Development Plan process and would be a matter for local communities to progress.

5067 – Wilford - Object

Placemaking is a joke. This policy destroys existing communities. There can be zero benefit from imposing huge inner city density housing estates on the green outskirts of smaller communities with little or no infrastructure or facilities. The resulting gridlock and poorer air quality together with the destruction of green spaces and hedgerow habitats can never be undone. History shows that all developments of this nature result in isolated communities and commuter brick box deserts. There is nothing of benefit to existing communities.

Suggested Change

The Authority need to revise their ideological fantasy policies around creating communities and active travel and recognise what happens in the real world outside of their offices and computers. We recognise the need for housing but better use of brownfield sites where more high-rise could be built together with smaller (max 100) developments that will have less local impact and therefore more community acceptance and nicer places to live...

Council Response

As stated in the policy, successful placemaking can add social, economic, environmental and cultural value to new development. Placemaking statements will be required for all major developments to demonstrate how proposals accord with placemaking principles.

Criterion 8 of the policy refers to achieving higher densities where appropriate. Consideration will need to be given to the local context when determining appropriate

densities; however, a minimum density of 35 dwellings per hectare, as set out in Policy PGD2, is considered appropriate in key settlements, service centres and primary settlements. On suitable brownfield sites in sustainable locations close to transport nodes, higher densities are likely to be acceptable.

5906 – HBF - Object

The HBF objects to the phrase at para 6.33 'Development will be favoured'. Community engagement is already included in the planning process, and consultations take place during the LDP at various stages, so any development on an allocated site will have already been consulted on. There is also a requirement for a PAC to take place prior to an application being submitted and statutory consultation by the LPA once the application is submitted. If the place plans cover the application site, these have also undergone consultation. There is no justification for the LPA to suggest that one application will be favoured more, just based on the level of additional consultation which has taken place.

Para 6.34 The following wording should be added at an appropriate point: 'the Placemaking Statement should be proportionate to the scale of the development proposed.' The type of placemaking that can be achieved on each site varies considerably for several reasons, including the size/scale of the development.

The HBF objects to the requirement for a 'place-making statement' as it is unnecessary; all of the information required is already required to be included in a Design and Access statement, which is a mandatory requirement of a planning application. The requirement for unnecessary additional documentation solely adds delays to the planning process.

Suggested Change

Amend the wording of the supporting text and policy accordingly.

Remove the requirement for a placemaking statement.

Council Response

In respect of comments relating to Paragraph 6.33**,** it is the Council's view that meaningful engagement with local community should be an essential part of the Placemaking process, it should provide the opportunity for local communities to engage with developers and site promoters so that developments take account of specific local issues. This should not be seen as being a hindrance or a barrier for developers but an opportunity to create development that adhere to the Placemaking principles. Presently pre application consultations, regardless of their scale are more often than not limited to online consultations with little or no attempt to engage with local communities within their own communities. Policy SP4 seeks to address these shortcomings through encouraging developers to undertake meaningful engagement, and in those locations where the

community has developed Placemaking Plans, development should fully consider how their proposals contribute to the aims and objectives of the Placemaking Plan.

Similarly, with regard to para 6.34 the Council is of the view that there should be no limit to scale at which placemaking should be considered, the principles of placemaking should be considered as guiding principles for at all scale and appropriate response should reflect the scale and type of development proposed.

The Council maintain that a statement on placemaking should be included to demonstrate how placemaking principles have been considered. Paragraph 6.34 states that the placemaking statement should form part of the Design and Access Statement so the Council does not agree that this would result in unnecessary additional documentation and delays.

6010 - Barratt Redrow Homes (Lichfields) - Object
6084 - Barratt Redrow Homes (Lichfields) - Object

Policy SP4 requires "Placemaking Statements" for "all major developments". It is observed that supporting paragraph 6.34 of the RLDP states that "Major development proposals must be supported by a Placemaking Statement to demonstrate clearly how proposals for new development will achieve placemaking. This Placemaking Statement should form part of the Design and Access Statement that will be a requirement for most major planning applications."

It should be made clear in the wording of Policy SP4 that Placemaking Statements are not expected to be standalone documents as per supporting paragraph 6.34 of the RLDP.

Suggested Change

Policy SP4 should therefore be amended as follows:

"…Placemaking Statements will be required as part of Design and Access Statements for all major developments setting out how the proposal accords with Placemaking Principles…"

This amendment is necessary to ensure that Policy CI1 meets the second test of soundness (Is the Plan appropriate?).

Council Response

The supporting text for the policy in Paragraph 6.34 already states that the placemaking statement should form part of the Design and Access Statement. It is not considered that this also needs to be referenced in the policy.

6112 - Hart - Object

High density housing should be avoided. People have to live in them. Developers need to find ways of accommodating all people in comfortable housing. Once they are built, high density housing schemes will be around for a long time to the detriment of other residents.

Suggested Change Proposed

Mention of high-density housing should be removed.

"Supports Public Transport" should be replaced with "Ensures adequate public transport is available, providing subsidies where necessary".

Council Response

Policy SP4 Placemaking encourages high density developments 'where appropriate' this would be considered on a case-by-case development having regard to the local context. The policy as worded is consistent with national planning policy set out in Planning Policy Wales (PPW) which advocates high density developments particularly where these are in close proximity to public transport hubs and in locations well served by a range of services and facilities (PPW para 3.51).

With regard to the proposed suggested rewording of Policy SP4 in relation to the availability of subsidisation of public transport, bus subsidy is not within the remit of the RLDP.

7082 - Barratt Redrow Homes (Highlight Planning) – Comment

The wording of the policy should better reflect the position already set out in the supporting text so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested Change

Amend wording of SP4

Council Response

The supporting text for the policy in Paragraph 6.34 already states that the placemaking statement should form part of the Design and Access Statement. It is not considered that this also needs to be referenced in the policy.

7099 - Barratt Redrow Homes (Turley) - Object

The identification of high-level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.

It should be made clear in the policy that the 'Placemaking Statement' is not expected to be a standalone statement but will form part of a Design and Access Statement.

Paragraph 6.33 should be amended to note that consultation will be 'encouraged' or similar.

There is a degree of crossover and repetition between Policy PGD1 and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Suggested Change

Amend Policy SP4.

Council Response

The comments are noted. In respect of phased developments, it is considered that placemaking should be undertaken from the outset for a development as a whole and not piecemeal, as the latter would ignore the wider opportunities and contributions a development may provide from a strategic approach to placemaking.

The supporting text for the policy in Paragraph 6.34 already states that the placemaking statement should form part of the Design and Access Statement. It is not considered that this also needs to be referenced in the policy.

In respect of comments relating to Paragraph 6.33**,** it is the Council's view that meaningful engagement with local community should be an essential part of the Placemaking process, it should provide the opportunity for local communities to engage with developers and site promoters so that developments take account of specific local issues. This should not be seen as being a hindrance or a barrier for developers but an opportunity to create development that adhere to the Placemaking principles. Presently pre application consultations, regardless of their scale are more often than not limited to online consultations with little or no attempt to engage with local communities within their own communities. Policy SP4 seeks to address these shortcomings through encouraging developers to undertake meaningful engagement, and in those locations where the community has developed Placemaking Plans, development should fully consider how their proposals contribute to the aims and objectives of the Placemaking Plan.

Whilst the Council recognise that there is a degree of overlap between Policy SP4 Placemaking and Policy PGD1, Policy PGD1 provides more detailed site-specific criteria covering a broader range of design matters than that considered under Policy SP4. These policies in combination highlight the plan's commitment to Placemaking and the delivery of well-designed sustainable, inclusive and healthy environments in line with the RLDP vision and objectives.

7228 – Squires - Object

I am concerned that the Plan, as currently drafted, does not ensure new growth will support strong, healthy, and inclusive communities.

Until the Council provides clear evidence and enforceable measures addressing community cohesion, housing mix, and health impacts, I cannot have confidence that the Plan is sustainable or fair. I am concerned that the Plan does not explain how new housing and growth will integrate with existing communities.

There is a risk that rapid development could strain local services, schools, and community spaces, and make it harder for neighbours to get to know one another.

I would like to see evidence that social infrastructure will keep pace with population growth and that communities will remain inclusive and connected.

I am concerned that clusters of affordable housing in certain areas could lead to pockets of social exclusion or limit access to opportunities. The Plan does not explain how it will ensure a good mix of housing types and tenures across the Vale. I ask that the Council provide evidence that housing allocations will support socially balanced, inclusive communities.

I am concerned about increased traffic, air pollution, noise, and the loss of green spaces affecting health and wellbeing. The Plan does not provide clear commitments to protect or improve accessible green spaces or safe walking and cycling routes. I would like to see evidence that the Plan has assessed the health impacts of growth and will take steps to mitigate them.

Council Response

The Deposit RLDP has been subject to a rapid Health Impact Assessment which has sought to identify the negative and positive impacts that the plan may have on health and wellbeing. The findings of this are detailed within Background Paper BP3A and has been considered by the Council in the development of policies with the Deposit RLDP.

In line with national planning policy, the policy framework of the RLDP contains a suite of policies that seek to ensure that new development promotes well designed, accessible and healthy environments. For, example policies SP4 Placemaking and PGD1- Creating Well Designed and Inclusive Spaces and Places require all new developments to demonstrate how they meet the principles of set out in the policies.

In respect of affordable housing, where affordable units are secured through Section 106 on private developments, the Council has a policy for requiring developers to pepper pot affordable housing within large developments in clusters of no more than 10 dwellings to ensure that they are integrated throughout the development.

In considering growth, the Council as assessed the infrastructure needs necessary to support each new development which the council shall secure from the developer through legally binding s106 agreements. Details of the necessary infrastructure is contained within the Infrastructure Plan which accompanies the Deposit Plan.

PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES

A total of 9 duly made representations (4 comments, 5 objection) were received in respect of Policy PGD1- Creating Well Designed and Inclusive Places.

Some representations from the development industry on Policy PGD1 consider that elements of the policy replicate other policies of the plan and in particularly SP4, creating confusion and extra work. Other issues raised include the importance of Secured by Design principles was referenced, parking provision and design codes. It was also suggested that the policy referenced the need for outdoor community interaction.

STATUTORY CONSULTEE RESPONSES

6624 - South Wales Police – Secured by Design Officer - Comment

Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces should not immediately abut residential buildings.

South Wales Police ask that all new developments are built to Secured by Design standards and that they work with The Vale of Glamorgan planning Department at the pre planning stage to ensure safe spaces. Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.

Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial) Guide. South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.

Council Response

The comments are noted. The South Wales Police Design Out Crime Officer is as a statutory consultee and is consulted on relevant planning applications. The RLDP recognises the importance of designing safe and inclusive spaces, as reflected within criterion 1 of PDG1 which references "creating safe, accessible, integrated, inclusive and active environments." In addition, the Council's Draft Healthy Placemaking SPG which accompanied the Deposit RLDP contains a section on the importance of designing out crime.

INDIVIDUAL RESPONSES

COMMENTS/OBJECTIONS

4570 - Barton - Comment

Good highways with FREE CAR PARKING en masse otherwise people will be reduced to their own areas for life without a need to venture here or elsewhere which will hamper the economy irreversibly.

Suggested Change

As above mass free car parking and the removal of time-limited restrictions

Council Response

The provision of car parking within commercial and residential development are determined against parking standards as detailed with the Council's adopted Parking Standards Supplementary Planning Guidance. Car parking charges are outside of the remit of the RLDP.

4571- Barton - Comment

OK but integrate effective TA with underground discreet car parking that is free to encourage visitation and net expenditure.

Council Response

Comments are noted. Car parking provision, design and layout are consideration at the formal planning stage. The Council consider that it would be inappropriate to specify a requirement for parking to be underground, particularly given the associated costs of such provision and the impacts that this may have on development viability.

5881 – HBF - Object

This policy in part duplicates the previous policy SP4 and a number of other policies in the plan; it is not considered necessary. This duplication causes confusion and extra work for those submitting planning applications.

Suggested Change

Delete Policy

Council Response

Whilst the Council recognise that there is a degree of overlap between Policy SP4 Placemaking and Policy PGD1, Policy PGD1 provides more detailed site-specific criteria covering a broader range of design matters than that considered under Policy SP4. These policies in combination highlight the plans commitment to Placemaking and the delivery of well designed sustainable, inclusive and healthy environments in line with the RLDP vision and objectives.

6127 - Taylor - Object

We are pleased to see Policy SP4 of the LDP states development will be required to follow Placemaking principles. This intention is followed through successfully in Policy PGD1 – Creating well designed and inclusive spaces. Yet we do not feel 'providing high quality multi-functional green open spaces which can provide a choice and range of activities...' goes far enough to promote the range of options available to promote well designed and inclusive spaces. We feel that the promotion of active and healthy lifestyles needs some reference at this juncture as to how this might be achieved. The need to create 'safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for active travel, and promote sustainable transport choice's' needs more robust wording to back it up.

The reference in the explanatory text to walking cycling and safe play needs to be enhanced to discuss opportunities for incoming to communities to gather outdoors, to socialise, to grow, to eat and to plan their healthy lifestyles together. Maximising opportunities of walking, cycling and play to reduce the causes of ill health, and reducing health inequalities is something we as planners, have been trying to do for generations.

We need to go further. More explanation of what a healthy environment looks like would be appreciated. We must design spaces with more dynamism, with a variety spaces and opportunities that communities can gain ownership of. Where housing need is significant and indeed where viability of site delivery is a factor, smaller, more effective spaces, can be delivered at little cost and with the opportunity for community 'ownership' from the outset. Blank canvass, small areas for growing of food, commensurate to the size of development can achieve huge amounts in terms of promoting active and healthy lifestyles. Where there is a mix of uses, local businesses can become involved in the spaces through sponsorship, donations, gaining extra customers and receiving food to cook or sell. This type of place making can deliver true 'green infrastructure'. They are indeed - high quality multi-functional green spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.

Suggested Change

Refer to the need for communities to interact and socialise outdoors and ways this may be achieved. A small shelter next to a communal growing area could provide this at little expense.

Council Response

The Council has published Draft Healthy Placemaking Supplementary Planning Guidance to support the Deposit RLDP and provides detailed guidance as to how new development can assist in promoting health and wellbeing. The guidance highlights the importance of

ensuring spaces are designed to be accessible, inclusive and facilitate social interaction; and includes example as to how developers can take measures to achieve this. The SPG is signposted at paragraph 6.40 of the plan. Accordingly, the Council consider that the plan and SPG addresses these matters and no changes to the plan are required.

6596 – Barton - Comment

Design Codes based on Traditional Vernacular Architecture should be utilised in preference to Design Guides.

Council response

The comments are noted. However, it is the Council's view that whilst design codes can encourage improved quality and consistency, they also can limit the ability for new development to response creatively to local context. Accordingly, the plans policies on place making and design emphasis that new development should respect local context, as reinforced within criterion 1 of Policy SP4 requiring *"high quality sustainable design that reflects local distinctiveness, character, and cultural identity"* and criterion 4 of Policy PGD1- which states that development should make *" a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character".*

6774 - Persimmon Homes (Boyer Planning) - Object

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

Suggested Change

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

Council response

Whilst the Council recognise that there is a degree of overlap between Policy SP4 Placemaking and Policy PGD1, Policy PGD1 provides more detailed site-specific criteria covering a broader range of design matters than that considered under Policy SP4. These policies in combination highlight the plans commitment to Placemaking and the delivery of well designed sustainable, inclusive and healthy environments in line with the RLDP vision and objectives.

6907 - Barratt Redrow Homes (Boyer Planning) - Object

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

Suggested Change

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

Council response

Whilst the Council recognise that there is a degree of overlap between Policy SP4 Placemaking and Policy PGD1, Policy PGD1 provides more detailed site-specific criteria covering a broader range of design matters than that considered under Policy SP4. These policies in combination highlight the plans commitment to Placemaking and the delivery of well designed sustainable, inclusive and healthy environments in line with the RLDP vision and objectives.

7100 - Barratt Redrow Homes (Turley)

There is a degree of crossover and repetition between Policy PGD1 and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Suggested Change

Amend to be only one policy.

Council response

Whilst the Council recognise that there is a degree of overlap between Policy SP4 Placemaking and Policy PGD1, Policy PGD1 provides more detailed site-specific criteria covering a broader range of design matters than that considered under Policy SP4. These policies in combination highlight the plans commitment to Placemaking and the delivery of well designed sustainable, inclusive and healthy environments in line with the RLDP vision and objectives.

PGD2 – RESIDENTIAL DEVELOPMENT DENSITIES

A total of seven representations were received on Policy PGD2 Residential Development Densities (2 support, 4 comments, 1 objection).

Some representations were seeking lower density development and another representor supported the policy wording which allowed flexibility where there are site constraints. Two promoters of allocated sites confirmed that the prescribed densities set out in the policy were deliverable on their sites.

INDIVIDUAL RESPONSES

SUPPORT

7189 - H Jones, L Sungur and P John (Herbert R Thomas) - Support

The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4).

Council response

Support is noted.

6013 - Barratt Redrow Homes (Lichfields) – Support

The approach to residential development densities in Policy PGD2 is consistent with paragraph 3.51 of PPW. The Land to the East of Colwinston allocation measures approximately 0.84ha and is therefore able to provide the minimum density of 30 dwellings per net hectare set out in Policy PGD2. It is noted that the Candidate Site Submission for Land to the East of Colwinston (Site ID: 453) was for a gross site area of 5.24ha and therefore if the allocation were to be expanded, up to 157 dwellings could be delivered at the site during the RLDP period.

Council response

Support is noted.

COMMENTS/OBJECTIONS

4583 – Barton - Comment

Low density must be pursued with Traditional Architecture used to mitigate against otherwise harmful effects.

Council Response

The comments are noted.

4976 – Reed - Object

Further explanation is required to explain the role of settlements such as Rhoose and the density acceptable there. It is considered that the village exhibits spacious standards with bungalows and houses being the predominant housing type. A maximum of 30 dwelling per hectare after deductions is therefore considered a maximum for this area. In Barry Penarth etc 35 is appropriate due to its better facilities and infrastructure.

Rhoose should have a maximum of 30 units per hectare to enable any developments permitted to fit in with the essentially rural nature of the village**.**

Council Response

The Council notes the responses received regarding density.

Policy BP48 has informed the increased density requirements within the RLDP. As evidenced within BP48, while national policy does not prescribe specific density figures, Planning Policy Wales (PPW) and Future Wales both state that higher densities should be encouraged around urban centres — particularly settlements in growth areas with rail connections.

Future Wales states: *"Planning authorities must plan the growth and regeneration of the National and Regional Growth Areas to maximise opportunities arising from the investment in public transport, including identifying opportunities for higher density, mixed use and car free development around metro stations."* PPW 12 further states that *"higher densities should be encouraged in urban centres and near major public transport nodes or interchanges, to generate a critical mass of people to support services such as public transport, local shops and schools."*

Rhoose sits within the strategic growth area and benefits from rail connectivity, satisfying both criteria.

Since the adoption of the LDP, Rhoose has seen one major housing development approved, which achieved a density of 52 dwellings per hectare (dph) — albeit on a brownfield site. Across the LDP plan period, primary settlements averaged 53 dph, well above the 35 dph target set out in the RLDP for primary settlements. This demonstrates that primary settlements identified within the RLDP can, and should, aim for net density levels of 35 dph or higher, consistent with Rhoose's position within the RLDP settlement hierarchy.

It should also be noted that Policy PGD2 does permit lower density levels where:

1. Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;
2. Reduced densities are required due to significant site constraints, or to preserve a natural or historic feature that would contribute to existing or future local amenity; or

3. The proposal is for a mixed-use development where the residential use is the subordinate element.

These provisions ensure that settlements are protected from inappropriate density levels where development would be out of keeping with the local area, or where other specific circumstances apply.

6775 – Persimmon Homes (Boyer Planning) - Comment
6908 – Persimmon Homes (Boyer Planning) - Comment

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

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.

A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.

Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.

Suggested change

Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.

Council Response

The comments are noted. With regards to the suggested change, it is considered that the policy does already give support for higher densities in key, service centre and primary settlements, so this does not need to be referenced again in the next paragraph.

7101 – Barratt Redrow Homes (Turley) - Comment

It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations. This is relevant to Church Farm, St Athan.

The inclusion of caveats recognising that lower densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Council Response

The comments are noted. A planning application has been submitted for the first phase of Church Farm, St Athan, and it is anticipated that this will be determined against the adopted LDP, and the policies on density prescribed within it.

SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES

A total of 12 duly made representations (2 support, 2 comments, 8 objections) were received in respect of Policy SP5 - Creating Healthy and Inclusive Places and Spaces.

Representations raising objections to Policy SP5 highlighted concerns of additional policy requirements for undertaking HIA and burden placed on developers,, the absence of guidance, potential delays and potential impact on viability. Conversely, those supporting the policy highlighted the importance of detailed guidance, and clearer processes to ensure effective implementation.

STATUTORY CONSULTEE RESPONSES

6625 - South Wales Police Secured by Design Officer - Comment

South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.

Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry). Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.

Council Response

Comments are noted. The Council has published Draft Healthy Placemaking Supplementary Planning Guidance to accompany the Deposit RLDP which was made available for consultation alongside the RLDP consultation. Whilst this provides detailed guidance on open space provision, the Council note the best practice guidance on Safer Parks referenced in this representation and the Council shall include this within the amended SPG as a part of the consultation.

Proposed Change

Make reference to the Safer Parks document in the Healthy Placemaking SPG.

6716 - Cardiff and Vale University Health Board – Comment

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and

wellbeing. HIA should also consider the cumulative impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

Suggested Change

We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live full, productive and prosperous lives.'

Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community...'.

Suggestion to change wording from 'encouraged' to 'expected' for example:

Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement for HIA will assist with this expectation.

Council Response

Support and comments are noted. The points raised within the representation are addressed across the plan under other policies of the plan in respect placemaking and community infrastructure, with further detailed guidance on matters relating to access to community facilities and pre-application engagement set out in the Healthy Placemaking Supplementary Planning Guidance, which has been published alongside the Deposit Plan. The Council wish to highlight that that similar representations have been made by Cardiff and Vale UHB on the draft Health Placemaking SPG, and these have been incorporated into the SPG.

6717 - Cardiff and Vale University Health Board - Support

We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to ensure Developers submit a quality HIA and implement the conclusions.

Council Response

Support is noted.

6718 - Cardiff and Vale University Health Board - Comment

Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

Suggested Change

Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

Council Response

The amendments to the organisation names are noted. This will be amended in Paragraph 6.61.

Proposed Change

Amend the organisation names as follows in Paragraph 6.61:

Cardiff and Vale ~~Local~~ **University** Health Board and ~~Public Health~~ Wales Health Impact Assessment **Support** Unit **(Public Health Wales)**.

INDIVIDUAL RESPONSES

SUPPORT

7083 - Barratt Redrow Homes (Highlight Planning) - Support

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

Council Response

Comments and support are noted.

COMMENTS/OBJECTIONS

5925 – HBF – Object

The HBF objects to the requirement to carry out a screening assessment relating to health impacts, as the plan has already considered the impact of the proposed developments on the health and well-being of communities through the strategic HRA and HIA and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan, a HIA should not be necessary for individual sites. Only where there is a departure from the plan should the Council consider requiring an HIA.

Further, if the developer complies with the other wording of the policy, then the development will have taken into account its impact on health, so why then carry out a screening assessment? The policy tests can be achieved without carrying out a screening assessment.

In terms of the requirement to complete a Healthy Placemaking Checklist, the policy refers to guidance in an SPG, which currently does not exist; this could lead to delays in the

delivery of housing schemes. It also leads to uncertainty for developers who do not currently know what will be required. Placemaking is also required by other policies in the plan, and the health impacts of the plan have also been considered through the HIA process, so what additional information could such a document provide

Suggested Change

Remove the requirement to carry out a screening assessment. If the screening requirement is retained, the threshold should be set higher, as this would be an overly onerous requirement for smaller sites below 100 units.

Council Response

The Council has undertaken a strategic high level Health Impact Assessment (HIA) of the plan's vision, objectives and policies to enable the Council to assess the health impact of the plan as a whole, rather than consider the specific health impacts of a development in relation to its location. In addition, the Council undertook a rapid HIA of the Deposit Plan (Background Paper BP3A) in the form of a workshop with key stakeholders from a range of public boduies. This workshop identified health and wellbeing issues and the linkages with the built environment. Similarly, the supporting justification at para 6.55 of Policy SP5 clearly sets out the links between the built environment and health and wellbeing, highlighting how developments are built and designed can have a direct impact on health and wellbeing. Indeed, Planning Policy Wales (edition 12) Section 3.19 highlights the important role that planning has "*shaping the social, economic, environmental and cultural factors which determine health and which promote or impact on well-being in line with the Healthier Wales goal"* and *"Health impacts should be minimised in all instances, and particularly where new development could have an adverse impact on health, amenity and well-being. In such circumstances, where health or amenity impacts cannot be overcome satisfactorily, development should be refused" (paragraph 3.21)*

It therefore follows from this that the RLDP should include measure that new developments contribute positively to the health and wellbeing of its residents, hence the requirement for HIA for certain developments. The Council also considered that the threshold specified is appropriate and reasonable within the context of the scales of development proposed within the RLDP.

In relation to Supplementary Planning Guidance, a draft Healthy Placemaking SPG was published alongside the Deposit RLDP for consultation. The decision to publish this with the Deposit Plan was to ensure that an SPG would be in place prior to the adoption of the RLDP thus ensuring that Council would be in the position to provide developer guidance as to meet the requirements set out in Policy SP5.

6015 - Barratt Redrow Homes (Lichfields)
6086 - Barratt Redrow Homes (Lichfields)

For major residential developments, Policy SP5 requires that a “Healthy Placemaking Checklist” be undertaken and for significant residential developments, a rapid HIA is required. The need to ensure that development proposals are designed to facilitate accessible healthy environments is recognised. However, there is a need to be cautious in applying additional policy burdens like HIAs to sites proposed for allocation in the RLDP that could go beyond what has been tested in the Viability Assessments submitted during RLDP preparation, especially for smaller sites. Policy SP5 as drafted therefore risks not achieving the third test of soundness (Will the Plan deliver?)

Suggested Change

There is a need to be cautious in applying additional policy burdens like HIAs to sites proposed for allocation in the RLDP that could go beyond what has been tested in the Viability Assessments submitted as part of the RLDP preparation, especially for smaller sites.

Council Response

Comments are noted. The Council has produced a draft Healthy Places SPG and this was published alongside the Deposit RLDP for consultation. This sets out additional guidance for developers and site promoters in respect of meeting the requirements set out in Policy SP5, including how and when to undertake HIA. This also includes best practice guidance on how new developments can integrate measures that can contribute towards creating health and inclusive environments, such as site and layout, location and provision of open space and active travel. Many of the elements within the SPG relate to matters already required through the planning process so would not be an additional policy burden. The SPG provides examples of how these can be integrated within a development in a manner that can improve health and wellbeing. It is not considered that such measures would impact on site viability.

6131 - Taylor - Object

Social Farms & Gardens are pleased to see Policy SP5 creating healthy and inclusive places and spaces mentions 'enabling opportunities for access to a healthy food environment'. It is certainly a step in the right direction. Perhaps the explanatory text could refer to what is meant by this. Certainly reference needs to be made to the SPG on healthy place making. With the lack of clarity, a developer may move onto to considering other ’methods’ of creating ‘a healthy and inclusive place’.

The explanatory text needs to make further reference to the possibilities such a space could look like and what it might entail. There is much discussion in the text about health and wellbeing services but there are also much less, capital intensive, things that can be provided. How could to a healthy food environment contribute to the wider determinants of health? These should be suggested and discussed at pre application stage. Reference to

health inequalities is welcomed – perhaps more emphasis on the potential of food growing spaces could be brought in here. The need for affordable housing as part of 'allocated' sites presents a further opportunity to achieve this.

Suggested Change

Reference to the different types of food growing spaces that can be provided to help create a healthy environment. Less capital-intensive ideas could be referred to our by referring the reader to the SPG on healthy placemaking.

Council Response

The Council has published Draft Healthy Placemaking Supplementary Planning Guidance to accompany the Deposit RLDP and provides detailed guidance as to how new development can assist in promoting health and wellbeing. This includes guidance on access to healthy food and includes examples such as providing opportunities for including spaces for growing food. The SPG is signposted at paragraph 6.40 of the plan.

6776 - Persimmon Homes (Boyer Planning) - Object

6909 - Barratt Redrow Homes (Boyer Planning) - Object

Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data.

Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities. The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.

The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Suggested Change

The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.

Council Response

Comments are noted. Policy SP5 is supported through the evidence base provided within BP36 – Planning Healthy Places (June 2024). This illustrates the health inequalities which are present across the Vale and as such warrant the case for new developments to contribute towards creating environments which benefit human health and well-being. It is recognised that some datasets may have been updated since the paper was prepared, but the underlying conclusions have not changed.

Further detailed in respect of how new developments can contribute to this goal is provided within Healthy Placemaking SPG, which sets out the legislative requirements for HIA, and includes guidance for developers in respect of incorporating measures that would support Policy SP5.

The Council has worked closely with Public Health Wales and Cardiff and Vale UHB in preparing background paper BP36 – Planning Healthy Places (June 2024) and intend to keep this evidence under review and shall updated periodically as and when deemed necessary. The representation refers specifically to BP36 using 2019 WIMD data rather than the later 2025 data, which was not available at the time of the preparation of the background paper. The paper references that in 2019 three LSOAs were ranked in the 10% most deprived areas in terms of the health domain. This has increased to five LSOA in 2025, demonstrating that there remains a justification for planning policies for health.

It is acknowledged that HIA Regulations are due to come into effect in April 2027. The Regulations require a public body to prepare mandatory HIAs for decisions of a strategic nature about how it exercises its functions. Public bodies can also carry out voluntary HIAs. The Regulations do not specify that HIAs are mandatory for planning applications, nor do they set a threshold for when HIAs should be prepared.

The Wales Health Impact Assessment Support Unit have issued '*Guidance for Local Planning Authorities (LPAs) in Wales: What to consider when advising applicants on the requirements of a Health Impact Assessment (HIA) for development.'* This guidance explains that it is a matter for the local planning authority to set out the triggers for HIA and that these should be proportionate and reasonable. Given that it is the LPA that sets the policy rather than the Regulations themselves, it is not considered necessary to make specific reference to the HIA Regulations within the policy, as this may cause confusion in respect of the requirements.

7084 - Barratt Redrow Homes (Highlight Planning) – Object

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.

Proposed Suggested Change

Amend wording of SP5.

Council Response

Policy SP5 sets two different thresholds for the consideration of health, with rapid HIAs only being required for significant developments of 100 dwellings or more or employment/commercial/leisure floorspace of 4,000m2 or greater, demonstrating a proportionate approach. The Council published a Draft Healthy Placemaking SPG for consultation alongside the Deposit RLDP and this states that when undertaking initial HIA screening this "*will generally be proportionate to the size of the development; the larger the development the more detailed the responses to the questions will be expected to be, whereas smaller developments are more likely to provide a brief summary*" (paragraph 6.1.8).

The Draft SPG also clarifies how the health checklist should be utilised and their relationship with Design and Access Statements (DAS).

ANNEX 4 - ACTIVE AND SOCIAL PLACES – HOUSING

This section addresses the representations made on the Housing Requirement, Affordable Housing and other forms of specialist housing and Gypsy and Traveller Provision in the Plan:

- SP6 Housing Requirement
- SP7 Affordable Housing Provision
- SP8 Affordable Housing Requirements
- HG4 Rural Affordable Housing Led Sites (representations regarding the policy approach. Site specific representations are addressed in the housing allocations section)
- HG5 Affordable Housing Exceptions Sites
- HG6 Provision of Specialist Accommodation
- HG7 Houses in Multiple Occupation
- SP9 Gypsy and Traveller Provision
- GT1 Gypsy and Traveller Accommodation

No representations were made on Policy HG8 Conversion and Renovation of Rural Buildings or HG9 Replacement Dwellings, Residential Extensions and Annexes in the Countryside.

POLICY SP6 - HOUSING REQUIREMENT (INCLUDING TABLE 2 HOUSING SUPPLY COMPONENTS AND TABLE 3 SPATIAL DISTRIBUTION OF HOUSING LAND SUPPLY)

A total of 38 Representations were received in respect of Policy SP6 Housing Requirement, with further comments also being made on Table 2: Housing Supply Components and Table 3: Spatial Distribution of Housing Supply (April 2025)

The housing requirement set out in Policy SP6 has been subject to a wide range of representations, principally concerning its overall scale, evidential basis, spatial distribution, regional alignment and deliverability. Comments have also been made in respect of the conformity with Future Wales, and the implications of updated population and household projections and estimates of housing need, as well as the flexibility allowance.

STATUTORY CONSULTEE RESPONSES

5117 – Welsh Government (Planning Division) – Comment

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 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.

Council response

The Council notes WG's confirmation that they do not object to the level of housing growth for the plan period, as well as the recognition of the work that has underpinned the housing requirement figure.

The comment that it will be essential to demonstrate the deliverability of the key sites is acknowledged. Key site allocations are already informed by an extensive evidence base, including supporting studies, masterplanning work and viability assessments, which have been subject to independent review, which provide the evidence to demonstrate that the sites are deliverable.

5118 – Welsh Government (Planning Division) - Comment

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.

Council response

Support for the approach taken in calculating the windfall allowance, the non-delivery allowance and the flexibility allowance is noted.

Appendix 1 of the Deposit RLDP sets out the list of sites within the housing land supply with forecast completions (Tables 19 and 20 of the DPM) and the Housing Development Trajectory graph (Diagram 16 of the DPM). The data informing the figures in the graph reflects rows E to K of Table 21 of the DPM (Calculating the Anticipated Annual Build Rate) and has been included under the graph. However, for completeness, it is proposed to amend this table to also include rows A to D and K to N.

Proposed Change

Update the Table in Appendix 1 of the RLDP to include additional rows to ensure that it fully mirrors Table 21 of the DPM.

6619 - South Wales Police – Secured by Design Officer - Comment

Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.

Council Response

Comments are noted. As a statutory consultee South Wales Police will be consulted on major housing developments at the formal planning application stage.

INDIVIDUAL RESPONSES

SUPPORT

6738 – Hallam Land Management (Savills) – Support

Hallam are generally supportive of the aims of this policy. The housing requirement should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver.

Council Response

Support is noted.

COMMENT/OBJECTION

4585 – Barton – Comment

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals. TA will overcome challenges with housing quotas significantly if done authentically.

Council Response

The comments are noted. The purpose of Policy SP6 is to set a housing target. Detailed design matters are considered in other policies such as SP4 on Placemaking. The representor has also made similar comments in respect of Policy SP4 and a detailed response is provided under that policy.

The RLDP includes a policy on the presumption against demolition (Policy CC2) which will support the re-use of existing buildings for alternative uses, which may include residential uses. This forms part of the assumptions on windfall allowances. However, there are insufficient buildings available for residential conversion within the Vale to make any more than a small contribution towards meeting the overall housing requirement.

4802 – Cwmpas - Comment

The addition of a specific reference to community led housing within Policies HG1, HG2, HG3 akin to that within HG5 would enable to the benefits and reach of community led housing to be expanded into mainstream housing policies and allocations and not only Exceptions Policy.

Our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Council Response

The comments are noted. The Council proposes an amendment to the supporting text for Policy SP7 to include a reference to community-led affordable housing. As the representor acknowledges, community-led affordable housing is already referenced within Policy HG5. It is considered that these references provide sufficient support to ensure that this form of housing is given appropriate consideration, particularly as the RLDP should be read as a whole. It is not considered necessary to include a reference to community-led housing within Policy SP6, as this policy establishes the overall housing requirement, while subsequent policies set out how that requirement will be delivered.

4977 – Reed - Object

Rhoose a small settlement without major infrastructure is taking some 10 percent of the housing requirement with permissions outstanding at Rhoose Point and the new proposed development at Readers Way. This is a village which should not be taking such a high percentage of development when places like Llantwit Major Cowbridge and Penarth are taking virtually nothing in comparison.

Suggested Change

Reduction in the number of housing units in Rhoose until better infrastructure is provided. This would as a minimum include 2 trains per hour, 2 buses per hour, a comprehensive school, better retails and health facilities as well as improved road surface access. Until this happens Rhoose should be taking a maximum of 5percent of additional dwellings.

Council response

The RLDP Strategy seeks to direct housing growth within the Vale of Glamorgan to the most sustainable locations, in accordance with the LDP Settlement Hierarchy. This hierarchy provides the planning framework for the sustainable distribution and direction of development across the Vale. The spatial distribution set out in Table 3 demonstrates how new housing growth is being directed in line with the Spatial Growth Strategy (SP1), specifically towards those settlements that are best served by public transport connectivity and offer a broad range of services and facilities. Rhoose is identified as a Primary

Settlement within the Sustainable Growth Area, and the level of development proposed is reflective of its relative sustainability and capacity to accommodate growth.

It is inaccurate to state that Llantwit Major, Cowbridge and Penarth are taking 'virtually nothing.' As set out in Table 3 Spatial Distribution of Housing Supply, 2,285 units will be provided across the three service centre settlements over the lifetime of the RLDP.

5455 – Entwistle - Object

The housing requirement stated by the plan seems unsustainable and unrealistic. If only two if the key sites were to fall through the amount of houses supposedly required cannot be reached. The figures around required housing for a start are questionable. Migration from outside the Vale taking up housing stock needs to be addressed. Priority should be given to the well being and daily lives of existing residents first and foremost and housing for people born within the Vale.

Suggested Change

The amount housing required needs to be more realistically recalculated and priority given to housing for people born and already living within the Vale. The issue of migration from outside the area placing additional stress on the limited housing stock needs to be addressed first and foremost. The employment land goals should also be greater and be aligned with solid infrastructure improvements to actually encourage real long term sustainable business to move to the area.

Council response

The evidence base for the housing requirement is set out within BP7 Housing and Employment Growth, BP8 Demographic Evidence and BP8A Supplementary Demographic Evidence, which collectively provide the rationale for the level of growth included in the RLDP.

The RLDP does not allocate housing sites solely for Vale of Glamorgan residents as those properties available for open market sale can potentially be purchased by people from outside of the Vale of Glamorgan. Affordable housing is allocated in accordance with the Council's housing allocation policy.

5633 – Dubois-Jones – Object

Where do those figures come from? Aren't they over estimated for the Vale? Many houses have been built in the last few years but the infrastructure has NOT been improved, especially the transport system and the medical centre under much pressure as it is. Driving around the Vale and into Cardiff is becoming a nightmare and causing much stress to workers (not everyone works from home!!) and families.

Suggested Change

Could not existing buildings which are abandoned be repurposed? Instead of using green land and crucial farming areas, could not more brown land be used?

Council response

The evidence base for the housing requirement is set out within BP7 Housing and Employment Growth, BP8 Demographic Evidence and BP8A Supplementary Demographic Evidence, which collectively provide the rationale for the level of growth included in the RLDP.

The RLDP prioritises appropriate brownfield and under-utilised land that where it is sustainability located and can be demonstrated to be deliverable. There is, however, insufficient suitable brownfield land available to meet housing requirements and greenfield sites are therefore necessary to deliver sustainable growth.

The re-use of existing buildings can form part of the housing supply and an allowance for unallocated 'windfall' sites, which can include conversions of existing buildings, has been factored into the housing land supply calculation.

5940 – HBF – Object

The housing requirement and the number of homes delivered through new allocations should be increased to make the plan more ambitious and align with Future Wales and the Vales' identified role as a national growth area.

The flexibility allowance should be increased to 15%. The Development Plan Manual 3 suggests 10% should be the starting point. A higher figure is considered appropriate due to the low level of new allocations and the limited number of key sites allocated in the plan. This means the plan has a heavy reliance on a small number of sites, which would suggest the need for greater flexibility provided through a range of additional smaller sites.

Suggested Change

Increase flexibility to 15%.

Increase the number of dwellings on allocated sites and increase the range of site sizes allocated.

Council response

The Council considers that the level of housing growth proposed in the RLDP is appropriate within the context of the National Growth Area, setting housing and employment growth at a level that is ambitious but deliverable and complementary to Cardiff's role as an economic driver within the region.

Furthermore, the level of growth in the context of the National Growth Atea is considered appropriate by Welsh Government, who confirm that the Deposit RLDP to be in general conformity with the Future Wales.

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

The Council has worked with site promoters on the number of units on allocations, having regard to site constraints and balancing the local context with seeking to maximise densities where appropriate. The numbers identified are considered to be appropriate and deliverable. A range of site sizes has been allocated, with allocations sizes ranging from 25 units to 600 units.

6018 – Barratt Redrow Homes (Lichfields) – Object

Even with this 9.8% flexibility allowance in place, 8,660 is still 10.0% lower than the predicted household increase of 9,623 in the Vale of Glamorgan based on Welsh Government's 2022-based household projections for VoG over the RLDP period.

BDWR endorses the incorporation of a flexibility allowance, as is required by paragraph 5.59 of the Development Plans Manual (2020). However, it is considered that the flexibility allowance needs to be increased to a minimum of 15-20% (like Monmouthshire and Swansea respectively) to ensure that the ambitious anticipated annual build rate of between 885-906 dpa from 2027/28 to 2030/31 can be achieved.

Suggested Change

In order for Policy SP6 to meet the third test of soundness (Will the plan deliver?), it is evident that additional sites will need to be allocated and existing allocated sites will need to be expanded to accommodate further dwelling numbers. Allocation HG4(1) is potentially capable of delivering greater than the 25 dwellings currently allocated.

Council response

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate

and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

The RLDP Sustainable Growth Strategy sets a maximum threshold of 25 dwellings for rural affordable housing led sites such as HG 4.1 Land to the East of Colwinston, as this is considered to be an appropriate scale for the size of settlement.

6050 – Sims-Williams – Object

Policy SP6 - Rhoose seeing high order settlements than any other Vale Village. Object strongly to the massive amount of houses planned for readers way.

Council response

The RLDP Strategy seeks to direct housing growth within the Vale of Glamorgan to the most sustainable locations, in accordance with the LDP Settlement Hierarchy. This hierarchy provides the planning framework for the sustainable distribution and direction of development across the Vale. The spatial distribution set out in Table 3 demonstrates how new housing growth is being directed in line with the Spatial Growth Strategy (SP1), specifically towards those settlements that are best served by public transport connectivity and offer a broad range of services and facilities. Rhoose is identified as a Primary Settlement within the Sustainable Growth Area, and the level of development proposed is reflective of its relative sustainability and capacity to accommodate growth.

The representor has also made a representation on KS3 Land at Readers Way which has been addressed in the composite Council response for the site.

6054 – Barratt Redrow Homes (Lichfields) – Object

The RLDP's proposed housing target of 526 dwellings per year over ten years is unambitious, as recent delivery exceeded this figure outside pandemic years. The target is based on past averages, which include periods of low delivery, and ignores demographic trends and unmet needs. Given the Vale of Glamorgan's role within the National Growth Area in Future Wales, maintaining historic delivery rates does not reflect its strategic importance or the national policy emphasis on growth, making the current target insufficient and not aligned with its designated growth role.

Suggested Change

As set out in our representations to RLDP Policy SP1 and SP6, the level of housing growth in the VoG should be far more aspirational than currently set out in the RLDP.

Council response

The evidence base for the housing requirement is set out within BP7 Housing and Employment Growth, BP8 Demographic Evidence and BP8A Supplementary Demographic Evidence, which collectively provide the rationale for the level of growth included in the RLDP. The RLDP preferred growth option is a moderate level of growth based on a ten year average, which is considered an appropriate time period as reflects both periods of low housebuilding (as low as 115 units per annum) and significant increases in housebuilding following the adoption of the LDP (917 units in a single year).

The Council considers that the level of housing growth proposed in the RLDP is appropriate within the context of the National Growth Area, setting housing and employment growth at a level that is ambitious but deliverable and complementary to Cardiff's role as an economic driver within the region.

Furthermore, the level of growth in the context of the National Growth Atea is considered appropriate by Welsh Government, who confirm that the Deposit RLDP to be in general conformity with the Future Wales.

6057 – Barratt Redrow Homes (Lichfields) – Object

6060 – Barratt Redrow Homes (Lichfields) – Object

Policy SP6 plans for 8,660 homes comprising a 9.8% flexibility allowance on a target of 7,890. This should be increased to 15-20% (like in Monmouthshire and Swansea) to meet the ambitious build rate set out in the Housing Trajectory. Household projections indicate a 22% increase from 57,676 to 67,299 by 2036, requiring approximately 10,008 dwellings, which exceeds the current target in the RLDP. Policy SP1 and SP6 do not sufficiently address unmet affordable housing needs as the 2023 LHMA identifies a need for 1,075 affordable dpa over the next 5-years based on principal projections or 1,114 based on RLDP projections.

Suggested Change

In order for Policy SP1 and SP6, to achieve Test 2 (Is the Plan appropriate?) and Test 3 (Will the Plan deliver?), Policy SP1 and SP6 must be updated to accommodate a greater level of housing delivery based on the most up-to-date evidence.

In order to accommodate the additional level of housing growth the VoG needs, both the Strategic Growth Area settlements, and the Primary and Minor Rural Settlements will need to be allocated additional housing sites. Land at Primrose Hill, Cowbridge (Site ID: 455) can assist greatly in accommodating this additional housing need in a sustainable location. The site is adjacent to the higher order Strategic Growth Area settlement of Cowbridge, has

limited physical and environmental constraints and is capable of providing up to 220 dwellings at a density of 35 dwellings per hectare.

Council response

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

The evidence base for the housing requirement is set out within BP7 Housing and Employment Growth, BP8 Demographic Evidence and BP8A Supplementary Demographic Evidence, which collectively provide the rationale for the level of growth included in the RLDP.

It is recognised that there is a significant level of affordable housing need within the Vale of Glamorgan, driven primarily by a backlog of existing need. The RLDP seeks to maximise the delivery of affordable housing through the allocation of sites for rural affordable housing and 100% affordable housing developments, as well as through the provision of affordable housing on open market sites secured via Section 106 agreements. The Plan also includes a policy supporting affordable housing exception sites. In addition to measures delivered through the planning system, the Council and its partner Registered Social Landlords have extensive development programmes that will make a significant contribution towards meeting identified affordable housing needs.

Whilst the need for affordable housing has been an important factor in informing the housing requirement, it is not the sole consideration in determining the level of growth. Housing requirements must be deliverable and have regard to the wider social, economic, environmental and cultural considerations affecting the plan area to ensure the creation of sustainable places and cohesive communities. It is considered that the level of growth proposed by the RLDP achieves an appropriate balance between these objectives while maximising opportunities for affordable housing delivery.

6701 – Persimmon Homes (Asbri Planning) - Object

It is acknowledged that the preferred growth option (dwelling-led 10 Year scenario), upon which the RLDP housing requirement figure is based, reflects what has been delivered in the Authority in recent years, and is considered by the Authority to be realistic and suitably ambitious given the Vale's position within the National Growth Area. However, as a general comment, it is considered that targeting a higher/more ambitious growth rate would be appropriate.

In reviewing the most recent LDP Annual Monitoring Report (Vale of Glamorgan LDP 2011-2026, 7th Annual Monitoring Report, 1st April 2024 - 31st March 2025) (published October 2025), it is clear that there is a shortfall in housing delivery in the Vale of Glamorgan. It is stated that: “Between 1st April 2011 and 1st April 2025, a total of 6,999 dwellings were completed within the Vale of Glamorgan of which 4,641 units were general market dwellings against the 2025 AMR target of 6,387 that should have been developed at this point in the plan period, in accordance with the target. The number of additional general market dwellings delivered is 27.3% below the monitoring target”. In light of the fact that there is a significant shortfall in housing delivery (i.e. currently 27.3% lower than the LDP target), it is considered that a higher growth level for the Replacement Plan period would assist in rectifying under-delivery, allowing for housing completions to be better aligned with evidence of need (rather than repeating past shortfalls).

On February 12th 2026, the Welsh Government published updated estimates of additional housing need in Wales. The figures replace the 2019-based estimates and draw on the latest available data, including the 2022-based household projections published in late 2025. In summary, Welsh Government identify that there is a current estimated existing unmet need of 9,400 housing units. Estimates of existing unmet need have increased by 64% since the 2019-based estimates, due to a rise in homeless households in temporary accommodation.

In terms of future housing need, on average, between 7,800 and 9,300 additional housing units are estimated to be needed annually over the five-year period from July 2025 to June 2030, with a central estimate of 8,700 from newly arising need. The estimated newly arising need for July 2025 to June 2030 is higher than in the 2019-based estimates. This increase reflects higher projected household growth in the 2022-based household projections compared with the 2018-based projections used previously.

The Authority will need to give detailed consideration to the implications of the updated estimates of housing need. As the most up to date projections, the Replacement LDP must properly account for the new dataset to ensure soundness of the plan. In this regard, it is stated at Paragraph 5.34 of the Development Plans Manual that "In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government population and Household Projections are a fundamental part of the evidence base." Accordingly, Paragraph 5.35 goes on to state that "All LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period".

In light of the February 2026 publication of updated estimates of housing need in Wales (which indicate a substantial increase in both existing unmet housing need and newly arising need), and in the context of the existing under-delivery of units evidenced within the most recent LDP AMR (i.e. which identifies a shortfall in housing delivery of 27.3% on the adopted LDP target), it is considered essential that the overall growth levels for the Replacement Plan are revisited (and increased accordingly).

Suggested Change

That the overall growth levels for the Replacement Plan are revisited (and increased accordingly).

Council response

The evidence base for the housing requirement is set out within BP7 Housing and Employment Growth, BP8 Demographic Evidence and BP8A Supplementary Demographic Evidence, which collectively provide the rationale for the level of growth included in the RLDP.

It is acknowledged that the Welsh Government published its 2025-based estimates of additional housing need on 12 February 2026. It should be recognised that these are national estimates for Wales and are not local authority-level assessments. The purpose of these estimates is to illustrate a range of possible future housing need, based on past trends and the best available data. They also provide an indication of how additional housing need might be split between market and affordable housing under a set of assumptions and are intended to support discussions on future housing policy. Welsh Government is clear that these estimates should not be used as housing targets.

It should be noted that these estimates were revised on 5 August 2026 following the identification of a minor error. At the same time, Welsh Government published additional guidance highlighting that the 2024-based national population projections, released in April 2026, showed a different pattern for Wales compared with earlier projections. Specifically, the principal projection was lower than any recent principal projection for Wales and indicated a decline in the population over the 25-year projection period. In addition, the

latest population estimates showed a decrease in Wales' population between 2024 and 2025. In light of this, Welsh Government stated that "users of this output are advised that evidence from the latest national population projections and population data suggests that the estimates of additional housing need published here are likely to be at the upper end of the range."

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

6766 – Persimmon Homes (Boyer Planning) – Comment

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

The housing requirement is based on average completion rates over the first ten years of the adopted Local Development Plan. However, a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved. A five-year average build rate of 780 units per annum was achieved between 2016 and 2021.

The ten-year average delivery rate fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation.

The current adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.

Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP.

The DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. The 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026) have been published. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2% and the Vale has the largest percentage increases (up 11.7%).

It remains unclear whether existing unmet need has been fully factored into the overall housing requirement. This is particularly important in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need. There is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales.

Suggested Change

Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed

flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

Council Response

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

It is acknowledged that the Welsh Government published its 2025-based estimates of additional housing need on 12 February 2026. It should be recognised that these are national estimates for Wales and are not local authority-level assessments. The purpose of these estimates is to illustrate a range of possible future housing need, based on past trends and the best available data. They also provide an indication of how additional housing need might be split between market and affordable housing under a set of assumptions and are intended to support discussions on future housing policy. Welsh Government is clear that these estimates should not be used as housing targets.

It should be noted that these estimates were revised on 5 August 2026 following the identification of a minor error. At the same time, Welsh Government published additional guidance highlighting that the 2024-based national population projections, released in April 2026, showed a different pattern for Wales compared with earlier projections. Specifically, the principal projection was lower than any recent principal projection for Wales and indicated a decline in the population over the 25-year projection period. In addition, the

latest population estimates showed a decrease in Wales' population between 2024 and 2025. In light of this, Welsh Government stated that "users of this output are advised that evidence from the latest national population projections and population data suggests that the estimates of additional housing need published here are likely to be at the upper end of the range."

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

6820 – Mr Ian Fairweather (Boyer Planning) – Object

There are concerns regarding a need for a higher housing level and the need for development to be appropriate placed in sustainable allocations in a settlement in which people want to live is still relevant. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036. To accommodate this increased in flexibility allowance and over all housing numbers, it should be outlined that smaller sites typically

deliver more quickly, are less infrastructure-dependent, and increase build-out rates through diversification.

Suggested Change

Policy SP6 should therefore be amended to increase the flexibility margin to up to 15%, with consequential allocation of additional small and medium-sized sites.

Council Response

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

6853 – Taylor Wimpey (Savills) - Object

Taylor Wimpey maintains that the current housing requirement in the Deposit Revised Local Development Plan (RLDP) is fundamentally undervalued. By relying on a ten-year dwelling-led scenario, the methodology incorporates a period of suppressed supply caused by the delayed adoption of the previous plan. Taylor Wimpey argues that the council must instead align with Planning Policy Wales (PPW) by utilising the latest 2022-based household projections. This shift would increase the housing requirement from the proposed 7,587 units to 9,623 units to accurately reflect demographic evidence.

Regarding the flexibility allowance, Taylor Wimpey asserts that the proposed 10% buffer is insufficient. Evidence from the Annual Monitoring Report 2024-2025 reveals a 20.7% shortfall in completions against previous targets. Consequently, the firm recommends increasing the flexibility allowance to 20%, mirroring recent adjustments made by neighboring authorities like Bridgend, to ensure the housing requirement is actually met despite potential site non-delivery.

Taylor Wimpey also raises significant concerns regarding the reliability of the current land bank and windfall allowances. They suggest a 20% non-delivery discount should be applied to sites with planning permission to account for viability, site constraints, and landowner intentions. Similarly, the firm argues that windfall projections are overly optimistic; following the precedent set by Cardiff Council, they recommend reducing the windfall allowance to 75% of the ten-year average as easily developable sites become increasingly scarce.

Furthermore, Taylor Wimpey disputes the inclusion of certain "rolled forward" sites from the previous plan, specifically land at Pencoedtre Lane and Eglwys Brewis Road. These sites, totaling 370 homes, have failed to deliver despite long-standing policy support due to viability and technical constraints. Taylor Wimpey recommends their removal from the supply tables to maintain a realistic outlook on deliverability.

In conclusion, Taylor Wimpey suggests that the combination of a higher housing requirement, an increased flexibility buffer, and more cautious supply assumptions creates a significant deficit. They calculate that the RLDP must identify new allocations for an additional 3,872 homes to ensure a robust and sound development strategy for the region**.**

Suggested Changes

The 2022-based Welsh Government Projections should be used to determine the housing requirement, not the 2018-based projections.

The 10% flexibility allowance is insufficient and should be increased to 20%.

A 20% non-delivery allowance on land bank sites should be included.

Housing numbers from Windfall Sites should be reduced by 25%, following Cardiff Council's approach.

The deliverability of the rolled forward sites is clearly uncertain and should be removed from the Plan.

Taylor Wimpey have provided a suggested Housing Supply table.

Council response

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the

Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

The Welsh Government Development Plans Manual (DPM) states that: "The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

As set out in BP9A the assumption for windfall sites is also based on robust evidence and is supported by an Urban Capacity study. The types of windfall sites that will come forward in Cardiff – a city with large numbers of windfall applications often comprising high density development – will differ from the types of windfall site being deliver in the Vale, which will be smaller in scale, and therefore the approach taken in Cardiff to apply further reductions in addition to the flexibility and non-delivery allowance is not considered necessary in the Vale.

The rolled over LDP allocations at HG1 (1) Land to the west of Pencoedtre Lane, Barry and HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C), Llantwit Major, are both considered to be deliverable. The first site is within the ownership of the Council and is being brought forward under the Cardiff and Vale Housing Partnership. The second site has recently been acquired by Welsh Government and will be brought forward alongside the adjoining parcels of land (HG2(2) and HG2(3)).

6860 – Mr Andrew Raymond (Boyer Planning) - Object

Concerns are raised regarding the overall housing requirement and the level of flexibility incorporated within the Plan. Policy SP6 currently establishes a housing requirement of 7,890 dwellings over the Plan period and includes a flexibility allowance of 10%, resulting in an overall provision of 8,660 dwellings. Whilst the inclusion of a flexibility allowance is supported, it is considered that a 10% allowance may not be sufficient to ensure resilience within the housing trajectory.

Recent experience from other Local Development Plans across Wales has demonstrated the importance of incorporating higher flexibility allowances to account for delivery uncertainty, infrastructure constraints and potential delays to larger strategic sites.

For example, other authorities have incorporated flexibility allowances in excess of the standard 10% to ensure the robustness of their housing supply and to provide a greater degree of adaptability should circumstances change during the Plan period.

Suggested Changes

It is considered that the Vale of Glamorgan RLDP should incorporate a flexibility allowance of at least 15%. This would provide additional resilience within the housing trajectory and reduce reliance on a limited number of larger strategic allocations.

Council response

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the

extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

6896 – Catesby Estates (Turley Associates) – Object

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

Noting Llandow's accessible location and proximity to existing and emerging strategic employment opportunities, Catesby broadly SUPPORTS the Sustainable Growth Strategy insofar as seeking to achieve the housing requirement through a range of housing opportunities. This includes the co-locating of housing and employment growth, with a focus on established business parks and industrial estates.

Suggested Changes

Catesby suggest that the level of growth is too low, taking into account the aspirations of Future Wales for the area and the latest population and household projections, which suggest a higher level of need is required for the Vale.

Council response

The Council considers that the level of housing growth proposed in the RLDP is appropriate within the context of the National Growth Area, setting housing and employment growth at a level that is ambitious but deliverable and complementary to Cardiff's role as an economic driver within the region.

Furthermore, the level of growth in the context of the National Growth Atea is considered appropriate by Welsh Government, who confirm that the Deposit RLDP to be in general conformity with the Future Wales.

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

6899 – Barratt Redrow Homes (Boyer Planning) – Object

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

Suggested Changes

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

Council response

The Council considers that the level of housing growth proposed in the RLDP is appropriate within the context of the National Growth Area, setting housing and employment growth at a level that is ambitious but deliverable and complementary to Cardiff's role as an economic driver within the region.

Furthermore, the level of growth in the context of the National Growth Atea is considered appropriate by Welsh Government, who confirm that the Deposit RLDP to be in general conformity with the Future Wales.

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on

updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

7040 – Marion Morgan (Geraint John Planning) – Object
7140 – Peter Stone Properties (Geraint John Planning) – Object
7170 - Wig Fach Property Company Ltd (Geraint John Planning) - Object

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. 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.

It 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. 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.

Council response

The Council does not agree that housing allocations carried forward from the adopted LDP without planning permission should be treated as a surplus to the RLDP housing supply. The purpose of the housing supply calculation is to identify all realistic and deliverable sources of housing that will contribute towards meeting the housing requirement over the plan period. Existing allocations that remain undeveloped but continue to be considered deliverable represent a legitimate component of that supply and should therefore be counted towards meeting the Plan's housing requirement.

The majority of sites that were rolled forward from the LDP either have planning permission or a planning application at an advanced stage of determination. The only two sites that are not within that category are HG1 (1) Land to the west of Pencoedtre Lane, Barry and HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C), Llantwit Major, although both are considered to be deliverable. The first site is within the ownership of the Council and is being brought forward under the Cardiff and Vale Housing Partnership. The second site has recently been acquired by Welsh Government and will be brought forward alongside the adjoining parcels of land (HG2(2) and HG2(3)).

7062 – Barratt Redrow Homes (Highlight Planning) – Object

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.

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. Additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends.

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6. In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. 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.

Council response

The evidence base for the housing requirement is set out within BP7 Housing and Employment Growth, BP8 Demographic Evidence and BP8A Supplementary Demographic Evidence, which collectively provide the rationale for the level of growth included in the RLDP.

It is acknowledged that the Welsh Government published its 2025-based estimates of additional housing need on 12 February 2026. It should be recognised that these are national estimates for Wales and are not local authority-level assessments. The purpose of these estimates is to illustrate a range of possible future housing need, based on past trends and the best available data. They also provide an indication of how additional housing need might be split between market and affordable housing under a set of assumptions and are intended to support discussions on future housing policy. Welsh Government is clear that these estimates should not be used as housing targets.

It should be noted that these estimates were revised on 5 August 2026 following the identification of a minor error. At the same time, Welsh Government published additional guidance highlighting that the 2024-based national population projections, released in April 2026, showed a different pattern for Wales compared with earlier projections. Specifically, the principal projection was lower than any recent principal projection for Wales and indicated a decline in the population over the 25-year projection period. In addition, the latest population estimates showed a decrease in Wales' population between 2024 and 2025. In light of this, Welsh Government stated that "users of this output are advised that evidence from the latest national population projections and population data suggests that the estimates of additional housing need published here are likely to be at the upper end of the range."

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

The Welsh Government Development Plans Manual (DPM) states that: "The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions

should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

7063 – Barratt Redrow Homes (Highlight Planning) – Object

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.

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.

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.

Suggested Change

Increase flexibility allowance.

Council response

With regard to the RLDP windfall allowance, this has been derived from historic small and large windfall trends within the Vale of Glamorgan over the long term. In establishing the annual allowance, the Council has fully taken into account the inherently irregular nature of windfall development and has adopted a measured approach in determining appropriate annual allowances for both small and large windfall sites.

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and

infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

7091 – Barratt Redrow Homes (Turley) – Object

Based on Welsh Government's 2022-based household projections and the DPM, the number of overall dwellings identified will not meet the identified housing growth needs of VoG for the RLDP period. The Council should review the position in terms of the updated household projections. In order to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery that reflects the most up to date evidence and align with Future Wales and the Vale's identified role as a National Growth Area.

Suggested Change

Amend to accommodate a greater level of housing delivery.

Council response

The supplementary evidence contained in BP8A sets out the Council's consideration of the 2022-based Welsh Government population and household projections. The Council maintains that the RLDP housing requirement continues to provide a robust basis for delivering a sustainable and achievable level of growth over the plan period. BP8A identifies concerns regarding the 2022-based projections, which are trend-based and therefore influenced by exceptional circumstances occurring during the preceding five-year period. This period included a high level of housebuilding associated with the implementation of the adopted LDP, as well as the impacts of the Covid-19 pandemic, during which many students returned from term-time addresses and re-registered with GP practices in the Vale of Glamorgan.

Given the volatility of recent migration trends, it is considered appropriate to place greater weight on longer-term demographic patterns rather than short-term fluctuations. In this regard, it is noteworthy that the population change identified under the 10-year migration variant is broadly comparable to the level of growth proposed by the RLDP.

Furthermore, the most recent 2024-based national population projections indicate a significantly lower level of growth than that implied by the cumulative total of the existing

local authority projections. The Chief Statistician has confirmed that work will commence on updating the local authority projections as soon as practicable to ensure they better reflect current demographic trends. In the meantime, the Chief Statistician has advised that "users should continue to consider the full range of local authority population and household projections that we publish." This is consistent with the approach already adopted by the Council in BP8A, which concluded that a longer-term perspective provides a more reliable basis for plan-making than reacting to short-term demographic changes.

7092 - Barratt Redrow Homes (Turley) – Object

The provision of a flexibility allowance is supported, but it should be increased to 15%. A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth.

Suggested Change

Higher flexibility allowance.

Council response

The Welsh Government Development Plans Manual (DPM) states that: "*The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility, with any variation robustly evidenced*." While other local authorities in the region have identified higher flexibility allowances, these are based on their own local evidence and circumstances and do not establish a precedent that must be followed by the Vale of Glamorgan.

The flexibility allowance provides a proportionate and necessary buffer to account for non-delivery, site slippage and market variability, thereby ensuring that the housing requirement can be met in full over the plan period. Given the strong level of commitments already within the housing supply, a higher flexibility allowance is neither necessary nor appropriate and could result in over-allocation, potentially undermining the spatial strategy and infrastructure planning objectives of the RLDP. The Council engaged with the Housing Stakeholder Group during the preparation of the housing supply calculation.

In addition, the Council has applied a non-delivery allowance in accordance with the requirements of the Development Plans Manual, which advises that such assumptions should be based on local circumstances and informed by the proportion of sites that have failed to come forward in the past. Section 5 of BP9A sets out the Council's assessment of the historic non-delivery of sites that were granted planning permission or allocated since 2011 but were subsequently not implemented. Based on this analysis, together with the extensive evidence supporting the housing allocations, the Council considers that a 5% non-delivery allowance is appropriate and justified for the Vale of Glamorgan RLDP.

TABLE 2 - HOUSING SUPPLY COMPONENTS

6771 - Persimmon Homes (Boyer Planning) – Comment

6904 – Barratt Redrow Homes (Boyer Planning) - Comment

Existing land supply - The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Windfall - The Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. We do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036, but it is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year. periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites.

Council response

The comments are noted. The existing land supply figure within the Vale of Glamorgan represents a statement of fact. This supply comprises units completed since the start of the plan period, units currently under construction, and large sites that have been granted planning permission (including those subject to Section 106 agreements).

The plan period commenced on 1 April 2021 and, at this stage, it is considered entirely reasonable that 44.3% of housing provision is accounted for within the existing supply, as this includes both completed units and sites with planning permission. These permitted sites will help ensure a steady stream of housing completions throughout the remainder of the plan period.

Uncommitted units already comprise more than half of the overall housing provision. If this proportion were significantly higher, there would be a risk of a disproportionate amount of housing being delivered towards the latter part of the plan period.

With regard to the RLDP windfall allowance, this has been derived from historic small and large windfall trends within the Vale of Glamorgan over the long term. In establishing the annual allowance, the Council has fully taken into account the inherently irregular nature of windfall development and has adopted a measured approach in determining appropriate annual allowances for both small and large windfall sites.

In addition, the Council has applied a 5% non-delivery allowance and a flexibility allowance to provide additional capacity to accommodate potential fluctuations in any component of the housing supply.

Further details of the sites contributing to the land bank, together with the Council's justification for their inclusion, are set out in BP9A Housing Land Supply and Trajectory.

TABLE 3 - SPATIAL DISTRIBUTION OF HOUSING SUPPLY

5073 - Wilford - Object

Why are smaller communities taking the brunt of this housing drive. 1000's of houses in Rhoose, St Athan etc. Destroys community cohesion and identity and turns small communities in the Vale into identikit commuter deserts. Creating large high density (previously greenfield) estates to satisfy developers and the Authority's wish for higher planning gain should not take preference over brownfield sites in larger towns where more high rise could be considered to maximise numbers (like Cardiff & Cardiff Bay)

Suggested Change

Larger towns should take a larger share of developments/ Where are the sites in Barry, Penarth, Cowbridge, Llantwit Major? Larger towns will have a larger amount of brownfield development land - eg Barry Docks, Llandow. There is ample space for smaller better integrated developments in the rural vale that could be done without massive community upheaval and environmental damage.

Council response

As detailed in Table 3, Barry, as a Key Settlement, is expected to accommodate almost 25% of future housing growth. This is considered commensurate with its position within the settlement hierarchy and its credentials as a sustainable settlement that is well served by sustainable transport infrastructure. The Service Centres of Cowbridge, Llantwit Major and Penarth are expected to accommodate 26% of the overall housing provision, which is also considered to be an appropriate level of growth.

It is recognised that Primary Settlements within the Strategic Growth Area are proposed to accommodate 40% of the overall housing provision through a combination of new allocations and existing commitments. However, there are five settlements within this category, namely Dinas Powys, Rhoose, Llandough, Sully and St Athan, all of which are considered sustainable locations capable of accommodating new development.

Minor Rural Settlements, Primary Settlements located outside the Strategic Growth Area, and Hamlets and Smaller Rural Settlements are forecast to accommodate 8% of housing growth over the plan period, which is consistent with their role within the spatial strategy. This is largely attributable to the existing land supply associated with planning applications determined in accordance with the adopted LDP, which was underpinned by a different spatial strategy.

Policy PDG2, Residential Development Densities, establishes a minimum density of 35 dwellings per hectare for development proposals within Key Settlements, Service Centres

and Primary Settlements. This represents an increase on the minimum density standards set out in the adopted LDP.

In principle, the Council would support higher-density development in appropriate locations, particularly where sites are well related to public transport nodes and local services and facilities. However, there are limited opportunities within the Vale of Glamorgan for high-rise development, having regard to the local context and character of existing settlements.

The Council has sought to allocate brownfield sites in accordance with the search sequence set out in Planning Policy Wales. However, there is insufficient deliverable brownfield land in sustainable locations to meet the area's future housing needs.

5644 - Entwistle - Object

Housing sites are concentrated around Barry, Rhoose St Athan which will create an enormous traffic problem on Port Rd West which is heavily congested at peak times. The allocation of new housing does not take into consideration the services such as healthcare & schools which are already oversubscribed.

Suggested Change

Scrap the existing LDP & come up with an LDP that is fair for all Vale residents & spread-out smaller developments in all areas of covered by the Vale not just large developments in Barry St Athan & Rhoose.

Council response

The cumulative impact of traffic generation from RLDP allocated sites has been considered as part of a Strategic Transport Assessment (BP14/BP14A) and appropriate mitigation measures are identified to address this. This is discussed in detail in respect of the representations on TR1.6 Highway Improvements at Weycock Cross Roundabout.

The impact on other infrastructure such as healthcare and education has also been considered (see BP37 Primary, Community and Intermediate Health Care and BP43 Education).

The representor considers that the RLDP should contain a strategy that distributes smaller-scale development more evenly across the Vale, rather than focusing growth within Barry, St Athan and Rhoose.

In response, it should be noted that, as part of the RLDP Preferred Strategy, a number of alternative spatial strategy options were considered (see BP6 Spatial Strategy Options). One of these options was a dispersed growth strategy, whereby development would be distributed across all Key Settlements, Service Centres, Primary Settlements and Minor Rural Settlements in a manner proportionate to the size of each settlement.

The assessment of the strategy options acknowledged that an advantage of the dispersed growth approach was that it would distribute development more equitably across the Vale. However, a number of significant disadvantages were also identified. In particular, the approach failed to take adequate account of environmental constraints, site availability and deliverability within individual settlements. In addition, it would have directed a greater proportion of development towards settlements with more limited services, facilities and public transport provision.

Furthermore, such an approach would not align with national planning policy, which seeks to direct development towards sustainable settlements that have good access to sustainable transport and a range of services and facilities. A dispersed growth strategy would inevitably result in development being allocated to less sustainable locations, where opportunities to travel by sustainable modes are more limited.

The conclusions of the Integrated Sustainability Appraisal indicated that a dispersed growth strategy would be one of the least sustainable options considered. In contrast, the Sustainable Growth Strategy taken forward through the RLDP was identified as the most sustainable option and was therefore considered to represent the most appropriate basis for the Plan's spatial strategy.

6076 - Barratt Redrow Homes (Lichfields) - Comment

Cowbridge comprises a sustainable self-contained settlement with regards to access to services such as primary and secondary schools, shops including supermarkets, medical services at the medical practice and pharmacy, sports activities including a leisure centre, a library and places of worship. Cowbridge has excellent connections to the A48 with regular bus services that provide access to Cardiff, Porthcawl and Llantwit Major. In order for the RLDP to achieve the second test of soundness (Is the Plan appropriate?), more housing growth should be located at Cowbridge owing to its sustainable location as a Service Centre Settlement.

Suggested Change

More housing growth should be located at Cowbridge

Council response

In respect of allocating additional housing within Cowbridge, the RLDP includes the provision of the existing adopted LDP housing allocation - Land adjoining St Athan Road (RLDP site reference HG1.6) for 105 dwellings. In addition, the housing land supply trajectory at Appendix 1 of the RLDP indicates that there are a further 275 dwellings (either under construction or not started at April 1st 2025) within Cowbridge. The Council is of view that this is an appropriate level of housing for the settlement.

6686 – Powells - Comment

The Deposit RLDP identifies Culverhouse Cross as a Primary Settlement outside the Strategic Growth Area within the settlement hierarchy. However, despite this designation, the RLDP allocates no housing growth whatsoever within Culverhouse Cross.

This creates a clear inconsistency between the settlement hierarchy and the spatial distribution of development. If a settlement is identified within the hierarchy as capable of supporting development, the development plan should logically identify opportunities through which that growth can occur. The absence of any allocations, windfall capacity or clearly defined delivery mechanisms means that the designation has no practical effect within the spatial strategy.

The failure to allocate development in Culverhouse Cross has several important consequences for the effectiveness of the Plan.

• Unmet Local Housing Need – Local affordable housing needs within the Wenvoe ward are not addressed within the spatial distribution of development. The RLDP therefore fails to demonstrate how identified housing need within this part of the authority will be met.

• Ineffective Settlement Hierarchy – The settlement hierarchy fails to operate as a meaningful spatial planning tool. If Primary Settlements are not expected to accommodate any development, the distinction between settlement tiers becomes blurred and the hierarchy ceases to function as a mechanism for directing growth.

• Displacement of Development Pressure – Housing demand associated with the eastern Vale is displaced to other settlements rather than being distributed across the settlement network in accordance with the hierarchy. This results in an imbalanced spatial strategy.

•Loss of Sustainable Small-Scale Opportunities – Opportunities for small-scale affordable housing delivery in locations close to employment, services and public transport are lost. This is particularly relevant in the case of Culverhouse Cross which functions as a significant employment and retail centre.

• Policy Mechanisms That Cannot Operate – The Plan relies on affordable housing exception mechanisms to deliver housing within settlements such as Culverhouse Cross. However, the extent of Green Wedge designation means that these mechanisms cannot realistically function without explicit clarification within the Plan.

Taken together these issues demonstrate that the current spatial strategy does not fully respond to the functional role of Culverhouse Cross within the settlement hierarchy and results in a distribution of development that is neither balanced nor responsive to local housing needs.

Council response

Paragraphs 6.14 and 6.15 sets out the Council's reasoned justification for the inclusion of Culverhouse Cross within the hierarchy and why additional houses are not considered appropriate:

"In respect of Culverhouse Cross, whilst identified within the hierarchy as a Primary Settlement, this is primarily a result of the redevelopment of the former ITV studios for housing, which has inevitably led to an increase in its residential role. However, unlike other settlements, the prevalence of services available is primarily associated with the out-of-town retailing at Culverhouse Cross and the settlement itself lacks any community facilities such as schools, community halls and healthcare facilities. In this regard, whilst the designation of Culverhouse Cross as a Primary Settlement is justified in line with the Settlement Appraisal Review methodology as it scores well in the assessment due to its proximity to the out-of-town retail park and regular bus services, its role and function is different. Consequently, further residential development at Culverhouse Cross would require residents to travel to other settlements for many basic amenities.

The Spatial Options paper identifies that development opportunities in both Culverhouse Cross (and Wenvoe) are significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge of both settlements."

6821 – Mr Ian Fairweather (Boyer Planning) – Object

The delivery of housing allocations is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements. Only 161 units are proposed on smaller allocated sites, equating to approximately 7% of newly allocated supply. In the context of the above, there remains significant concern that the spatial strategy continues to exclude allocations within Minor Rural Settlements, including St Nicholas.

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

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

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice.

Suggested change

A modest allocation at St Nicholas would represent proportionate growth consistent with the scale and character of the settlement.

Council response

The Strategy focuses growth in the areas that are most sustainable in terms of both sustainable transport and the availability of employment, services and facilities. Outside of the strategic growth area, small scale affordable housing led development proportionate to the scale of the settlement have been allocated within Minor Rural Settlements where appropriate sites are available, together with re-use of existing buildings and infill opportunities.

It is inaccurate to state that there is a complete absence of allocations within Minor Rural Settlements, as a number of small-scale, affordable housing-led allocations have been made in selected settlements.

In addition, land allocated in the adopted LDP within the adjoining settlement of Bonvilston, which lies within the St Nicholas and Llancarfan ward, has planning permission and has been implemented, although housing units have yet to commence on site. The development will deliver both affordable and open market housing.

6862 – Mr Andrew Raymond (Boyer Planning) - Object

Delivery is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements are required. Only 122 units are proposed on smaller allocated sites, equating to approximately 2.6% of newly allocated supply under (E) Rural Affordable Housing Led Sites – policy HG4. In the context of the above, there remains significant concern that the spatial strategy continues to exclude the required number of allocations within Minor Rural Settlements, including Colwinston.

It is agreed that the inclusion of smaller allocations can:
- Improve overall housing delivery rates
- Provide greater choice within the housing market
- Reduce delivery risk by diversifying supply
- Support rural communities through proportionate growth

Whilst it is noted that there is a proposed allocation within Colwinston – HG4 (1) – Land to the East of Colwinston for 25 units, there is still a clear disconnect between the identified role and function of settlements such as Colwinston and the absence of any further allocated sites capable of delivering an appropriate range and choice of dwellings. The strategy effectively restricts development to windfall and infill, without positively identifying

opportunities that would logically consolidate and strengthen the settlement. This approach is inconsistent with the settlement's accessibility and functional role.

Suggested Change

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A further allocation in Colwinston would represent proportionate growth consistent with the scale and character of the settlement.

Council response

The Strategy focuses growth in the areas that are most sustainable in terms of both sustainable transport and the availability of employment, services and facilities. Outside of the strategic growth area, small scale affordable housing led development proportionate to the scale of the settlement have been allocated within Minor Rural Settlements where appropriate sites are available, together with re-use of existing buildings and infill opportunities.

Land has already been allocated in Colwinston, which will deliver a range of choice of both market and affordable housing. This level of development in a minor rural settlement accords with the strategy and is considered to be commensurate with Colwinston's role and function.

SP7 – AFFORDABLE HOUSING PROVISION

A total of 19 duly made representations were submitted in respect of Policy SP7 (10 objections, 6 comments and 3 support).

The key issues raised through the representations made in respect of Policy SP7 that Policy SP7 is too rigid in requiring a fixed mix of affordable housing based without sufficient regard to site-specific viability, and factors such as abnormal costs, technical constraints, and wider planning obligations can affect deliverability. Representations also argued that SP7 conflicts with Policy SP8, the latter allowing for negotiation and viability assessment which is absent in SP7.

In addition, representations sought clarification to the wording of SP7 regarding the role of the Local Housing Market Assessment in guiding negotiations on tenure mix, and suggested rewording of the Policy replacing "minimum" with "target" and clarifying as to how site-specific circumstances, updated evidence, and viability would be considered. Further change sought in the supporting text to broadening references to the forms of community led housing that the Council would support.

Notwithstanding these representations, comments submitted generally supported the overall aim of increasing affordable housing provision.

STATUTORY CONSULTEE RESPONSES

5124 – Welsh Government (Planning Division)

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.

Council response

The comments are noted.

INDIVIDUAL RESPONSES

SUPPORT

4801 - Cwmpas

Cwmpas is positive in its response to the Deposit RLDP statements and welcomes the reference to community led housing as noted in Paragraph 6.121 which is a positive comment. Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing.

Council Response

Support is noted.

7068 - Barratt Redrow Homes (Highlight Planning)

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.

Council Response

Support is noted.

7095 - Barratt Redrow Homes (Turley)

The provision of a range of tenures, types and sizes of affordable homes is supported in principle.

Council Response

Support is welcomed.

COMMENTS/OBJECTIONS

4498 – Parker – Object

Your own words state:

Backlog of need from people on the housing waiting list is most acute within Barry and Penarth/Llandough so put the social homes in Barry and Penarth. Why should Rhoose and St Athan have to provide them??

Suggested Change

Build the social homes in Barry and Penarth

Council Response

The latest evidence on affordable housing need as detailed in the Council's Local Housing Market Assessment indicates that there is a high need for affordable housing across the Vale of Glamorgan. Whilst the evidence indicates that the greatest need is within Barry and Penarth, the Council's housing waiting list as of February 2026 identified 264 households on the waiting list for Rhoose and 212 households in St Athan. The identification of housing sites within these settlements shall therefore contribute to addressing this need, with the housing proposed in Barry and Penarth contributing towards addressing the needs in those settlements.

4803 – Cwmpas - Comment

It would be considered as beneficial that the Deposit RLDP policies on community led housing development could include a clear definition of community led affordable housing along the lines of that stated in the document attached to this representation. Our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Suggested Change

Request for minor amendment to the wording of paragraph 6.121 so that after the words 'co-operative housing' the words 'and other forms of community led affordable housing' are inserted as this would accord with the context of PPW Edition 12 as noted.

Council Response

Comments are noted. The suggested change would be in accordance with amendments in PPW Edition 12, published in 2024, which states "*Affordable housing may also include that owned by community-led housing organisations where this meets the Welsh Government's definition*."

Proposed change

In order to accord with this national policy definition, it is proposed to amend paragraph 6.121 as follows:

The Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments. **This** may include social and intermediate rent and low-cost home ownership, as well as co-operative housing and **other forms of community led affordable housing** and ~~those requiring~~ specialist housing including for older people.

5949 – HBF - Object

The words 'including a minimum of 3,070 affordable homes' should be changed to 'a target of 3,070 affordable homes'. The reason for this is that a minimum suggests it should be more; however, other relevant housing policies are worded to provide for a defined number or target and do not provide for more to be delivered. This change of wording does not stop more affordable homes from being provided, should developers choose to do so.

Additional wording should be included at the end of the policy:

'The mix of affordable housing will also take into account the character of the site and its surroundings to ensure the development creates a sustainable community in line with placemaking principles.'

Suggested Change

Amend the wording of the policy accordingly in line with the above comments.

Council Response

The affordable housing figure of 3,070 dwellings set out in Policy SP7 is identified as a minimum figure for the RLDP, reflecting the forecast affordable housing calculation detailed in Background Paper 9A: Housing Land Supply and Housing Trajectory. The calculation is based on affordable housing contributions from sites with planning permission and/or under construction, existing LDP allocations, RLDP Key Sites, Additional Sites and Affordable Housing-Led Sites, together with forecast windfall development over the plan period.

Where sites do not have planning permission, the calculation assumes that affordable housing will be delivered at policy-compliant levels, namely 30-40% for market-led sites and 50% for affordable housing-led sites. However, some sites may ultimately be delivered with higher levels of affordable housing, including 100% affordable housing schemes brought forward as exception sites or delivered by the Council and its RSL partners. For this reason, the figure set out in Policy SP7 is considered to be a minimum target for the Plan.

With regard to the suggested additional text, this is not considered appropriate for inclusion within this policy. The purpose of Policy SP7 is to set out the Council's realistic estimate of

the number of affordable homes that it will seek to deliver through the Plan. Matters relating to the mix of affordable housing and the character of development are addressed elsewhere within the Plan's policies and through the Council's Affordable Housing Supplementary Planning Guidance.

6029 - Barratt Redrow Homes (Lichfields) - Object

Policy SP7 stipulates that in order to meet the affordable housing target of 3,070 dwellings during the RLDP period "a mix of affordable housing will be required, informed by the Local Housing Market Assessment LHMA, waiting list data and the Older Persons Housing Strategy. This should include a range of tenures, types and sizes of homes, as well as an appropriate balance of general needs and specialist accommodation".

Whilst it is understood that it is a core RLDP objective to deliver affordable homes in VoG which respond to identified need, Policy SP7 must allow for viability to be considered. Whilst paragraph 6.120 of the RLDP states "In calculating the affordable housing target, the Council recognises that the number of affordable homes delivered during the plan period could be lower as a result of site viability constraints or greater where they are on sites delivered by the Council, Registered Social Landlords or on land owned by the Welsh Government", this recognition is not transferred into the wording of Policy SP7.

Suggested Change

It is proposed that Policy SP7 and Policy SP8 should be aligned so that they are consistent with each other and provide flexibility on a "case-by-case basis". This would ensure that the RLDP will meet the third test of soundness (Will the Plan deliver?).

Council Response

It is acknowledged that there may be instances where there are viability issues with a development. However, as housing allocations have been subject to viability assessments which demonstrate that they can support the affordable housing requirement, this should be seen as the exception rather than the norm. This accords with the Development Plans Manual which states "*only in exceptional circumstances should further viability appraisals be undertaken at the planning application stage*."

Lower delivery may be offset by some sites delivering higher than policy requirement, especially where they are delivered by the Council or RSL partners.

The supporting text for both Policy SP7 and SP8 refers to viability as a consideration in determining targets, and therefore it is considered that both policies are consistent. It is not considered necessary to specifically refer to viability in the policy text for SP7.

PPW states that "development plans must include a target for affordable housing (expressed as numbers of homes)." This should be based on the LHMA and identify the expected contributions that the LDP, and its policies, will make to meeting this target, whilst

taking account of both deliverability and viability considerations. Additionally, the Development Plans Manual confirms, “LPAs should maximise the delivery of affordable housing in their LDP, based on the viability evidence of allocations/sites in their plan” (para 5.105).

The affordable housing figure of 3,070 set out in Policy SP7 is identified as being a minimum figure for the RLDP, reflecting the forecast affordable housing calculation detailed within Background Paper 9A Housing Land Supply and Housing Trajectory. The calculation is based upon the affordable housing contributions from sites with planning permission and or under construction, existing LDP allocations, RLDP Key, Additional and Affordable Housing Led Sites and forecast windfall development over the plan period.

6073 - Barratt Redrow Homes (Lichfields)

Policy SP7 stipulates that in order to meet the affordable housing target of 3,070 dwellings during the RLDP period “a mix of affordable housing will be required, informed by the Local Housing Market Assessment LHMA, waiting list data and the Older Persons Housing Strategy. This should include a range of tenures, types and sizes of homes, as well as an appropriate balance of general needs and specialist accommodation”. Whilst it is understood that it is a core RLDP objective to deliver affordable homes in VoG which respond to identified need, Policy SP7 must allow for viability to be considered. There is a lack of clarity around the term ‘informed’. It is unclear whether the Council will require the mix reflect the LHMA etc or whether it is just a starting point for negotiation.

It is assumed that it is just a starting point but this could helpfully be clarified.

It is noted that the Council has ambitious policies for both affordable housing and net zero operational homes. In working towards delivery of these it will be necessary to carefully consider site viability and there must be some flexibility in both Policy SP7 to ensure that necessary new homes are built.

PPW paragraph 4.2.32 states that: ““When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable.”

Suggested Change

It is proposed that Policy SP7 and Policy SP8 should be aligned so that they are consistent with each other and provide flexibility on a “case-by-case basis”. This would ensure that the RLDP will meet the third test of soundness (Will the Plan deliver?).

Council Response

The Vale of Glamorgan Local Housing Market Assessment (2023) has assessed the housing market in the Vale of Glamorgan and considers the spatial distribution of affordable housing need across the Vale, either at ward level and/or by major settlements. This has been informed by a range of information including household projections, homelessness data, house prices, rental prices, household incomes, the Homes4U housing register, Aspire2Own

low-cost home ownership database, social housing stock turnover and projected housing supply data. Together this information provides a picture of the levels of affordable housing across the authority by bedroom size, location and tenure (social rented, and low-cost market housing), providing invaluable information for the Council's strategic planning and prioritisation of affordable housing delivery.

Experience within the Vale of Glamorgan indicates that the levels of affordable housing need within the authority will change at any given time, and therefore LHMAs provide a "snapshot" of the level of affordable housing at a specific time. As such, when considering the affordable housing required at planning application stage, the Council's Housing Department refers to its latest housing waiting list data alongside the LHMA to identify the required affordable dwelling mix, thereby ensuring that affordable housing secured reflects the most up to date housing needs of the area.

With regards to the proposed amendments to Policy SP7 to include references to site viability being reviewed on a site-by-site base, this point is considered within the criteria-based policy SP8.

The Council wish to also highlight that viability testing has also included an allowance for the net zero policies of the RLDP. Further detail is contained within Background Papers BP42 Viability Assessment and BP42A Independent Financial Viability of Key Sites.

6782 - Persimmon Homes (Boyer Planning) - Comment
6915 - **Persimmon Homes (Boyer Planning) - Comment**

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

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

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

Council Response

The support for the policy objective of delivering affordable housing is noted.

PPW states that "development plans must include a target for affordable housing (expressed as numbers of homes)." This should be based on the LHMA and identify the expected contributions that the LDP, and its policies, will make to meeting this target, whilst taking account of both deliverability and viability considerations. Additionally, the Development Plans Manual confirms, "LPAs should maximise the delivery of affordable housing in their LDP, based on the viability evidence of allocations/sites in their plan" (para 5.105).

With regards to increasing the RLDP housing flexibility allowance, the purpose of a flexibility allowance is to account for non-delivery and unforeseen issues of sites that may arise over the course of the plan period, it is not a means for increasing the overall housing supply as implied by the representations. Welsh Government Development Plans Manual (DPM) (Edition 3) requires a flexibility allowance to be a matter *"for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced. The policy framework in the plan should be clear regarding the housing requirement, provision, and flexibility allowance. The level of flexibility chosen by the LPA when the plan goes on deposit is broadly maintained upon adoption of the plan"*

The flexibility allowance in the Deposit Plan of approximately 10% accords with the DPM, and this has been built into the housing allocations. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the Council's consideration and justification for the flexibility allowance and reflects the delivery trends within the Vale of Glamorgan, as well as the robust assessment and focus of site delivery by the Council, alongside extensive supporting evidence that has been undertaken in the consideration of sites allocations. Consequently, the Council is of the view that the flexibility allowance set out in the RLDP is fully justified and does not need to be increased as a means of increasing affordable housing as this is not its purpose.

The affordable housing figure of 3,070 set out in Policy SP7 is identified as being a minimum figure for the RLDP, reflecting the forecast affordable housing calculation detailed within Background Paper 9A Housing Land supply and Housing Trajectory. It is not an artificial cap. The calculation is based upon the affordable housing contributions from sites with planning permission and or under construction, existing LDP allocations, RLDP Key, Additional and Affordable Housing Led Sites and forecast windfall development over the plan period. Additionally, the RLDP provides a policy framework that favours the delivery of affordable housing that will enable suitable and appropriate sites to come forward over the plan period.

7037 - Marion Morgan (Geraint John Planning) - Object
7137 - Peter Stone Properties Ltd (Geraint John Planning) - Object

7159 - Wig Fach Property Company (Geraint John Planning) - Object

Without a suitable supply of affordable housing delivered over the Plan period, trends that result in an extremely unbalanced demographic 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.

Council Response

Comments are noted. PPW states that "development plans must include a target for affordable housing (expressed as numbers of homes)." This should be based on the LHMA and identify the expected contributions that the LDP, and its policies, will make to meeting this target, whilst taking account of both deliverability and viability considerations. Additionally, the Development Plans Manual confirms, "LPAs should maximise the delivery of affordable housing in their LDP, based on the viability evidence of allocations/sites in their plan" (para 5.105).

The RLDP proposes to deliver as a minimum 3,070 affordable homes over the plan period. This figure has been calculated in accordance with national planning policy and guidance as detailed within background paper 9A Housing Land supply and Housing Trajectory. This considers the contribution of affordable housing from a number of housing land sources, namely from sites with planning permission and or under construction, existing LDP allocations, RLDP Key, Additional and Affordable Housing Led Sites and forecast windfall development over the plan period.

The RLDP has sought to deliver affordable housing in the areas of most need, and this is reflected in the housing allocations of the plan, whilst recognising the need to support affordable housing in rural areas through the identification of affordable housing led allocations, and the inclusion of an exceptions sites affordable housing policy. Together these shall facilitate affordable housing in sustainable rural settlements where appropriate.

7069 - Barratt Redrow Homes (Highlight Planning)

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 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.

Council Response

The Vale of Glamorgan Local Housing Market Assessment (2023) has assessed the housing market in the Vale of Glamorgan and considers the spatial distribution of affordable housing need across the Vale, either at ward level and/or by major settlements. This has been informed by a range of information including household projections, homelessness data, house prices, rental prices, household incomes, the Homes4U housing register, Aspire2Own low-cost home ownership database, social housing stock turnover and projected housing supply data. Together this information provides a picture of the levels of affordable housing across the authority by bedroom size, location and tenure (social rented, and low-cost market housing), providing invaluable information for the Council's strategic planning and prioritisation of affordable housing delivery.

Experience within the Vale of Glamorgan indicates that the levels of affordable housing need within the authority will change at any given time, and therefore LHMAs provide a "snapshot" of the level of affordable housing at a specific time. As such, when considering the affordable housing required at planning application stage, the Council's Housing Department refers to its latest housing waiting list data alongside the LHMA to identify the required affordable dwelling mix, thereby ensuring that affordable housing secured reflects the most up to date housing needs of the area.

7070 - Barratt Redrow Homes (Highlight Planning)

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.

Suggested Change

Increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites.

Council Response

The Council does not agree that the housing requirement should be increased as a means of maximising affordable housing delivery. The housing requirement has been derived through a proportionate assessment of demographic evidence, economic forecasts, household projections, housing market considerations, environmental constraints and infrastructure capacity, as detailed in the evidence base (BP7 Housing and Employment Growth Options, BP8 Demographic Evidence). The resulting requirement reflects an appropriate balance

between meeting identified housing needs and delivering a realistic, sustainable and achievable level of growth over the plan period.

While the Council recognises the significant need for affordable housing across the Vale of Glamorgan, it is important to distinguish between the overall housing requirement and affordable housing delivery. Increasing the housing requirement would not automatically result in a commensurate increase in affordable housing provision. Affordable housing delivery is influenced by a range of factors, including development viability, grant funding availability, market conditions and delivery mechanisms. The Plan's affordable housing target has been informed by a detailed assessment of anticipated affordable housing contributions and is considered to represent a realistic and deliverable estimate of provision over the plan period.

The housing requirement has also been translated into a housing land supply that includes a range of Key Sites, Additional Sites and affordable housing-led allocations distributed across the settlement hierarchy. This provides a robust portfolio of sites capable of delivering both market and affordable housing and supports the attainment of the Plan's affordable housing objectives. The Council is therefore satisfied that the strategy provides sufficient opportunities for affordable housing delivery without requiring a higher overall housing requirement.

Furthermore, the Plan has been prepared in accordance with the principles of sustainable development and seeks to direct growth to the most sustainable locations, where it can be supported by existing and planned infrastructure, services and public transport. Expanding the housing requirement beyond the level identified by the evidence base would necessitate the allocation of additional sites that may not align with the Plan's spatial strategy or sustainability objectives.

The Council therefore considers that the housing requirement is appropriate, justified by the evidence base and capable of supporting the delivery of the affordable housing target set out in Policy SP7. Consequently, no amendment to the housing requirement or the allocation of additional sites, including at St Nicholas, is considered necessary to make the Plan sound.

7093 - Barratt Redrow Homes (Turley)

This policy seeks to deliver only 3,070 affordable homes over the plan period, which is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.

Council Response

The 3,070 affordable homes specified with Policy SP7 is that which the plan proposes to deliver through the planning system. It does not include affordable housing that the Council may secure through other mechanisms available such as social housing grant, capital/ revenue grant funded schemes, RSL self-funded schemes, the reconfiguration of existing stock, private sector leasing schemes, or re-utilisation of empty properties. Whilst the plan can only deliver a proportion of the need that exists across the Vale, the policy approach in the RLDP has been to maximise affordable housing delivery, whilst also balancing this against the other objectives of the plan.

7094 - Barratt Redrow Homes (Turley)

The provision of a range of tenures, types and sizes should be assessed on a site-by-site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc. It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SP8.

Council Response

The Vale of Glamorgan Local Housing Market Assessment (2023) has assessed the housing market in the Vale of Glamorgan and considers the spatial distribution of affordable housing need across the Vale, either at ward level and/or by major settlements. This has been informed by a range of information including household projections, homelessness data, house prices, rental prices, household incomes, the Homes4U housing register, Aspire2Own low-cost home ownership database, social housing stock turnover and projected housing supply data. Together this information provides a picture of the levels of affordable housing across the authority by bedroom size, location and tenure (social rented, and low-cost market housing), providing invaluable information for the Council's strategic planning and prioritisation of affordable housing delivery.

Experience within the Vale of Glamorgan indicates that the levels of affordable housing need within the authority will change at any given time, and therefore LHMAs provide a "snapshot" of the level of affordable housing at a specific time. As such, when considering the affordable housing required at planning application stage, the Council's Housing Department refers to its latest housing waiting list data alongside the LHMA to identify the required affordable dwelling mix, thereby ensuring that affordable housing secured reflects the most up to date housing needs of the area.

The supporting text for both Policy SP7 and SP8 refers to viability as a consideration in determining targets, and therefore it is considered that both policies are consistent. It is not considered necessary to specifically refer to viability in the policy text for SP7.

7191 - Jones, L Sungur and P John (Herbert R Thomas)

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Council Response

Comments are noted**.**

SP8 - AFFORDABLE HOUSING REQUIREMENT

A total of 11 duly made representations were submitted in respect of Policy SP8 (4 objections, 5 comments, 2 support).

Representations submitted in response to Policy SP8 raise a number of objections relating to viability, flexibility, and internal consistency with other policies (namely SP7). Representations object to the setting of off affordable housing percentages, and at the same time requiring for affordable housing to be negotiated on a site-by-site basis, arguing that this creates uncertainty. Conversely, representors were made in support of this flexibility indicating that this is essential in recognising that affordable housing requirements may need to be adjusted where viability is constrained.

Representation also questioned why affordable housing led sites were required to delivery 50% affordable housing whilst in other rural areas 40% was required, this being viewed as being potentially unfair treatment of smaller rural sites where there are tighter viability margins.

STATUTORY CONSULTEE RESPONSES

5130 – Welsh Government (Planning Division)

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.

Council response

The comments are noted. In undertaking the high-level viability review, a stakeholder workshop was held with the purpose of engaging with the development industry to provide an insight into factors relevant to viability in the Vale of Glamorgan. The information provided was used to inform the high-level viability appraisal as set out in Background Paper 42 Viability Review, and the minutes of the stakeholder workshops are contained in Appendices 4 of the BP42.

Additionally, site specific viability appraisals have been undertaken for the 5 Key Housing allocations. These were undertaken in conjunction with the site promoters as detailed in Background Paper 42A Independent Financial Viability Assessment of Key Sites.

INDIVIDUAL RESPONSES

SUPPORT

7106 - Barratt Redrow Homes (Turley)

Recognition that the provision of affordable housing should be negotiated on a site-by-site basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Council Response

Support and comments are noted.

7192 - Jones, L Sungur and P John (Herbert R Thomas)

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits.

COMMENTS/OBJECTIONS

5961 – HBF - Object

The following wording in the policy should be deleted:

'The provision of affordable housing will be negotiated on a site-by-site basis, considering the evidenced viability of the development.'

The policy sets the required level of affordable homes, so there is no need to negotiate it on a site-by-site basis. This would create uncertainty for developers when negotiating site purchases and could also delay the delivery of new homes. It is also contrary to PPW 12 para 4.2.23, where it states, 'It is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage.'

The flexibility to negotiate the level of affordable housing is a part of a later point in the policy where it deals with situations where sites are unviable to deliver the level of affordable housing required. The last sentence of the policy should be reworded, as it currently creates uncertainty for developers when negotiating site purchases. It is also noted that a similar point is made at the end of Policy SP7, so the wording repeats another policy but uses different wording, adding to the confusion.

Suggested Change

Delete the wording 'the provision of affordable housing will be negotiated on a site-by-site basis, considering the evidenced viability of the development.'

Reword the policy point on unviable sites to include the ability to negotiate the level of affordable homes.

Council Response

The policy as worded is considered appropriate and reflects the need for flexibility when negotiating affordable housing and is consistent with Planning Policy Wales paragraph 4.2.32 which states that "*Site specific targets are indicative affordable housing targets which should be established for each residential site and for each mixed-use site which includes a residential component.*"

It should also be noted that in preparing the Deposit RLDP the Council undertook a review of the existing policies of the Adopted Vale of Glamorgan LDP (2011-2026), to highlight policies to be retained, amended or replaced. With regard to Policy SP8, the wording of the policy has been taken forward from the adopted LDP, where it was considered that the implementation of the policy as worded had not caused any confusion with site developers, nor impeded the Council's ability to successfully deliver affordable housing.

6030 - Barratt Redrow Home (Lichfields) - Object

Policy SP8 sets out that Primary and Minor Rural Settlements should meet an affordable housing requirement level of 40%.

We do query why affordable housing led allocations in the same geographic areas have a requirement of 50% affordable housing?

It is understood from paragraphs 6.122-6.123 of the RLDP that the affordable housing percentage requirements for the settlements in VoG are being carried over from the adopted LDP. However, this does not explain why windfall sites in the Primary and Minor Rural Settlements outside of the Strategic Growth Area would need to provide a minimum 40% affordable housing and the Affordable Housing Led Schemes in the Primary and Minor Rural Settlements outside of the Strategic Growth Area would need to provide a minimum of 50%. Further evidence is required on this matter to ensure that Policy SP8 meets the second test of soundness (Is the Plan appropriate?).

Policy SP8 also states that: "The provision of affordable housing will be negotiated on a site-by-site basis considering the evidenced viability of the development." Policy SP8 also states: "Where developers claim that the target is unviable, a detailed viability assessment must be submitted and independently reviewed."

The consideration of viability in Policy SP8 is endorsed as it is consistent with paragraph 4.2.32 of PPW. Policy SP8 also states that: "The exact mix of affordable housing required will be considered on a case-by-case basis having regard to the Council's latest needs evidence at the time of the application". Again, this level of flexibility is endorsed.

However, we are concerned that there is contradiction between Policy SP7 (Affordable Housing) and Policy SP8 that needs to be addressed. As drafted Policy SP8 (which

relates to all new residential developments in VoG including Affordable housing led allocations) allows flexibility for the delivery of mix of affordable homes as it allows for the

exact mix to be considered on a case-by-case basis having regard to the Council's latest evidence needs. Yet, Policy SP7 (which relates to all affordable residential units to be delivered in the RLDP period) applies a blanket approach that requires the mix of affordable housing to be informed by the Council's evidence base only, with no flexibility or consideration for site-specific cases or viability. Thus, the two policies as drafted in the RLDP currently contradict one another. This is especially important for the affordable led schemes as the housing mix (affordable and market) can have a big impact on the viability of the scheme given that they have more onerous planning obligations.

Suggested Change

On the basis of the above, it is proposed that Policy SP7 and Policy SP8 should be aligned so that they are consistent with each other and provide flexibility on a "case-by-case basis". This would ensure that the RLDP will meet the third test of soundness (Will the Plan deliver?).

Council Response

The Council notes the representation but does not agree that there is an inconsistency between the affordable housing requirements applied to general market-led development in the Rural Vale (40%) and those applied to affordable housing-led allocations (minimum 50%).

The affordable housing target of 40% in the Rural Vale reflects the proportion of affordable housing that can reasonably be sought on market-led developments whilst maintaining the viability and deliverability of schemes. In accordance with best practice, including the Development Plans Manual, high-level viability testing assesses the broad viability of development across each housing market area, whereas site-specific viability appraisals provide a more detailed assessment of individual sites. The two approaches are not contradictory; rather, site-specific appraisals represent a refinement of the high-level assessment.

This distinction is explained in BP42 Viability Assessment, which notes that, within each housing market area, there will inevitably be areas of both higher and lower viability, the nuances of which cannot be fully captured through an area-wide study of this nature.

In this context, whilst a 40% affordable housing target is considered appropriate for the high-level assessment, recognising that it retains a degree of theoretical headroom to account for uncertainties, the four affordable housing-led allocations are supported by site-specific viability assessments that demonstrate that they can viably deliver 50% affordable housing.

It should also be noted that the affordable housing-led allocations are larger in scale, ranging from 25 to 50 dwellings, than the developments that are likely to come forward as windfall sites within the minor rural settlements. Larger developments can benefit from economies of scale, which can improve viability and support the delivery of higher levels of affordable housing.

The second point raised is whether Policy SP7 contradicts SP8, as the representor considers that SP7 does not allow any flexibility in the mix of affordable housing, whereas SP8 states that the mix of affordable housing can be considered on a case by case basis.

The Council does not consider there to be a contradiction as the policies are seeking to achieve different things. Policy SP7 is a plan wide target, which, as stated in the policy text, will need to be met through a range of housing types. However, it does not prescribe the detail of what the requirements will be. SP8 sets out the area specific requirements in percentage terms and is clear that this will be considered on a case by case basis. In both policies the Council's evidence base is highlighted as a source to inform needs.

6074 - Barratt Redrow Homes (Lichfields) - Object

Policy SP8 also states that: "The provision of affordable housing will be negotiated on a site-by-site basis considering the evidenced viability of the development." Policy SP8 also states: "Where developers claim that the target is unviable, a detailed viability assessment must be submitted and independently reviewed." The consideration of viability in Policy SP8 is endorsed as it is consistent with paragraph 4.2.32 of PPW.

Policy SP8 also states that: "The exact mix of affordable housing required will be considered on a case-by-case basis having regard to the Council's latest needs evidence at the time of the application". Again, this level of flexibility is endorsed.

However, we are concerned that there is possible contradiction between Policy SP7 (Affordable Housing) and Policy SP8 that needs to be addressed. As drafted Policy SP8 (which relates to all new residential developments in VoG including Affordable housing led allocations) allows flexibility for the delivery of mix of affordable homes as it allows for the exact mix to be considered on a case-by-case basis having regard to the Council's latest evidence needs. Yet, Policy SP7 (which relates to all affordable residential units to be delivered in the RLDP period) requires the mix of affordable housing to be informed by the Council's evidence base only, it is unclear the extent to which there is no flexibility or consideration for site-specific cases or viability. Thus, the two policies as drafted in the RLDP currently contradict one another. This is especially important for the affordable led schemes as the housing mix (affordable and market) can have a big impact on the viability of the scheme given that they have more onerous planning obligations.

Suggested Change

On the basis of the above, it is proposed that Policy SP7 and Policy SP8 should be aligned so that they are consistent with each other and provide flexibility on a "case-by-case basis". This would ensure that the RLDP will meet the third test of soundness (Will the Plan deliver?).

Council Response

As detailed above, the Council does not consider there to be a contradiction as the policies are seeking to achieve different things. Policy SP7 is a plan wide target, which, as stated in the policy text, will need to be met through a range of housing types. However, it does not prescribe the detail of what the requirements will be. SP8 sets out the area specific

requirements in percentage terms and is clear that this will be considered on a case by case basis. In both policies the Council's evidence base is highlighted as a source to inform needs.

6783 - Persimmon Homes (Boyer Planning) - Comment
6916- Persimmon Homes (Boyer Planning) - Comment

Persimmon supports the position that residential development should help meet affordable housing need.

Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

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

Council Response

Support is noted. Policy SP8 already states that: "The provision of affordable housing will be negotiated on a site-by-site basis considering the evidenced viability of the development" and that "Where developers claim that the target is unviable, a detailed viability assessment must be submitted and independently reviewed." This is consistent with paragraph 4.2.32 of PPW which states "*Site specific targets are indicative affordable housing targets which should be established for each residential site and for each mixed-use site which includes a residential component.*"

7072 - Barratt Redrow Homes (Highlight Planning) - Comment

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence.

Council Response

Comments are noted. Policy SP8 has been informed by a high-level viability review as set out in BP42 Viability Assessment.

7193 - H Jones, L Sungur and P John (Herbert R Thomas) - Comment

We encourage to see reference to the provision of affordable housing to be negotiated on a site-by-site basis considering evidenced viability for the development.

Council Response

Comments are noted.

7194 - Jones, L Sungur and P John (Herbert R Thomas)

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA).

This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

Council Response

The Council notes the representation but does not agree that there is an inconsistency between the affordable housing requirements applied to general market-led development in the Rural Vale (40%) and those applied to affordable housing-led allocations (minimum 50%).

The affordable housing target of 40% in the Rural Vale reflects the proportion of affordable housing that can reasonably be sought on market-led developments whilst maintaining the viability and deliverability of schemes. In accordance with best practice, including the Development Plans Manual, high-level viability testing assesses the broad viability of development across each housing market area, whereas site-specific viability appraisals provide a more detailed assessment of individual sites. The two approaches are not contradictory; rather, site-specific appraisals represent a refinement of the high-level assessment.

This distinction is explained in BP42 Viability Assessment, which notes that, within each housing market area, there will inevitably be areas of both higher and lower viability, the nuances of which cannot be fully captured through an area-wide study of this nature.

In this context, whilst a 40% affordable housing target is considered appropriate for the high-level assessment, recognising that it retains a degree of theoretical headroom to account for uncertainties, the four affordable housing-led allocations are supported by site-specific viability assessments that demonstrate that they can viably deliver 50% affordable housing.

It should also be noted that the affordable housing-led allocations are larger in scale, ranging from 25 to 50 dwellings, than the developments that are likely to come forward as windfall sites within the minor rural settlements. Larger developments can benefit from economies of scale, which can improve viability and support the delivery of higher levels of affordable housing.

HG4 - RURAL AFFORDABLE HOUSING LED SITES

A total of 13 representations were submitted in respect of Policy HG4 (6 objections, 6 comments, 1 support).

The key issues raised through the representations made in respect of Policy HG4 are that the plan relies too heavily on large strategic sites and existing allocations to deliver affordable housing, whilst Policy HG4 allocates only a small number of new affordable led sites which representors considered would make a very limited contribution toward meeting the overall affordable housing target of the RLDP. Representations also objected to the absence of allocations in rural settlements identified in the RLDP settlement hierarchy (e.g. St Nicholas, Ystradowen, Ogmore-by-Sea) arguing for increasing the number of sites in rural areas. Conversely, in those settlements where an affordable housing led sites have been identified, objections were made to these sites on the grounds that these settlements have experienced recent growth through allocations in the LDP.

Several representations considered that the affordable housing requirement of 50% was and thresholds of 25 for minor rural settlements and 50 for primary settlements was overly prescriptive, arguing that limiting size capacities were arbitrary and potentially harmful to viability and would limit the ability to deliver schemes or respond to local needs. Representors also highlighted the potential problem of achieving a 50/50 market to affordable housing split on sites of 25 units. Accordingly, representations seek greater flexibility in both dwelling numbers and tenure mix.

STATUTORY CONSULTEE RESPONSES

5125 - Welsh Government (Planning Division)

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 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?

Council response

The support for the principle of the policy approach is welcomed.

With regard to settlement boundaries around affordable housing led sites, the sites are shown on the proposals map as being within the defined settlement boundaries of the settlements within which they are located, and in this regard, it is not considered necessary to refer to this within the policy, consistent with the other housing site allocation policies of the plan.

The Council does not consider that it is necessary to place additional controls over the land to ensure that the sites are delivered with a minimum of 50% affordable housing. Policy HG4 is a housing allocations policy. Other housing allocations policies (e.g. HG1) do not specify within the policy itself that affordable housing would need to be secured through Section 106 as this is addressed in other policies of the plan, including Policy SP8.

In identifying the affordable housing led sites, the Council has worked closely with the site promoters of the affordable housing led sites, where viability appraisals have been undertaken demonstrating that 50% affordable housing is viable. Additionally, Policy HG4 is explicitly clear that the sites are allocated on the basis of them delivering the required minimum 50% affordable housing, which shall be secured by the Council via s106, as stated in paragraph 6.133.

The affordable housing led sites will form part of the overall housing requirement, alongside market led sites. This accords with PPW paragraph 4.2.33, which states that *"Planning authorities must make provision for affordable housing led housing sites in their development plans. Such sites will include at least 50% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities."*

INDIVIDUAL RESPONSES

SUPPORT

7061 - Barratt Redrow Homes (Highlight Planning)

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.

The statements in policy HG4 and its supporting text 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**.**

Council Response

Support and comments are noted.

COMMENTS/OBJECTIONS

6026 - Barratt Redrow Homes (Lichfields)

The proposed 25-dwelling cap for Minor Rural Settlements is considered unjustified and should allow expansion where viable. Flexibility in dwelling numbers and market housing mix is necessary to meet local demand and ensure the financial viability of affordable housing delivery. The Council needs to ensure that it does not undermine site viability by being overly prescriptive on market (and affordable) dwelling mix.

Suggested Change

The removal of the arbitrary upper limit on maximum dwelling numbers for allocations in Minor Rural Settlements and the removal of policy restrictions on open market tenure, type and size will ensure that Policy HG4 meets the third test of soundness (Will the Plan deliver?) and will assist in the delivery of the site.

Council Response

Policy SP2 Settlement Hierarchy of the Deposit RLDP sets out the strategic hierarchy of settlements that provides the framework for future housing growth over the plan period, directing the majority of growth to the settlements within the sustainable growth area, reflecting the role and function of settlements with the growth area.

Outside the strategic growth area Policy SP2 proposes to limit additional housing growth to affordable housing led sites – these being sites of up to 50 dwellings in the Primary Settlements and 25 dwellings with minor rural settlements. This policy approach recognises the need for the plan to enable an element of open-market housing within rural villages will

facilitate the delivery of affordable housing where it would otherwise not be viable to provide new homes and will contribute to delivering mixed communities. The dwelling thresholds are considered appropriate within the context of the wider RLDP growth strategy which emphasises growth within the Key, Service Centres and Primary Settlements located within the Strategic Growth Area.

6822 - Mr Ian Fairweather (Boyer Planning)

There is no objection in principle to Policy HG4, but there is an objection to the fact that there is no development in St Nicholas (despite it being sustainably located on the A48).

Council Response

Several sites were submitted to the Council for consideration as part of the call for candidate sites in the St Nicholas area. Following the assessment of these, the Council deemed that none of the sites were considered suitable for inclusion within the RLDP. Details of these assessments are included in BP18A Candidates Site Assessment at Deposit Stage.

6865 - Mr Andrew Raymond (Boyer Planning)

It is recognised that Policy HG4 allocates development within some Minor Rural Settlements, and in particular within Colwinston. In the context of Policy HG4 they will be affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing. This is to meet the affordable housing needs of the local community. There is no objection in principle to this.

However, a balanced approach which allows both affordable housing led schemes and modest mixed-tenure developments would provide greater flexibility and assist in delivering a broader range of housing needs.

Suggested Change

Land adjacent to Waterton Lodge, Colwinston represents a sustainable and deliverable opportunity for modest residential development which could contribute positively towards the Plan's housing supply.

Council Response

Land adjacent to Waterton Lodge, Colwinston (409) was submitted through the candidate sites process but was deemed not to be suitable for further consideration BP18A Candidate Site Assessment at Deposit Plan Stage states "*The site would represent unacceptable intrusion into the open countryside and is affected by major highways constraints. The site is located within a minor rural settlement, and the scale of the proposal would be greater than*

that supported by the preferred growth strategy of the Replacement LDP. The site is also at a scale that could not be considered as a suitable affordable housing led development site."

7046 - Marion Morgan (Geraint John Planning)

It is not considered that this policy goes far enough to address the target and level of affordable housing need. 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. 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.

Suggested Change

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.

Council Response

Land at Ystradowen (430/4060) was submitted through the candidate sites process but was deemed not to be suitable for further consideration BP18A Candidate Site Assessment at Deposit Plan Stage states "*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 into 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.*"

7047 - Marion Morgan (Geraint John Planning)

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.

Council Response

The 3,070 affordable homes specified with Policy SP7 is that which the plan proposes to deliver through the planning system. Affordable housing led sites form part of a range of mechanisms to maximise affordable housing delivery.

Land at Ystradowen (430/4060) was submitted through the candidate sites process but was deemed not to be suitable for further consideration BP18A Candidate Site Assessment at Deposit Plan Stage states "*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 into 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."* New affordable housing to serve the area is being delivered within the settlement to serve local needs.

7060 - Barratt Redrow Homes (Highlight Planning)

As drafted, the Plan expects a great deal from a very limited rural supply offer. In our view, the objectives of the plan 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.

We 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. The omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.

Council Response

The identification of affordable housing led allocations have been considered in accordance with Planning Policy Wales paragraph 4.2.33 which states that "Planning authorities must make provision for affordable housing led housing sites in their development plans. Such sites will include at least 50% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities."

Accordingly, during the consultation on the Preferred Strategy of the RLDP and second call for sites, a number of site promoters submitted sites as affordable housing led sites. This included the resubmission of sites that had previously been submitted as market led sites as part of the first call for candidate sites.

Following the assessment of the sites submitted, the Council identified those sites considered potentially suitable for consideration as affordable housing led sites. However, prior to the final determination being made, the promoters of these sites were required to submit viability appraisals to evidence that the sites could support the provision of a

minimum 50% affordable housing, and once established the decision was made to allocate these site as Affordable Housing Led Sites under Policy HG4 of the RLDP.

The assessment of sites promoted as affordable housing led sites is set out in Background Paper BP18A Candidate Sites Assessment Deposit Plan Stage, and summaries of the viability appraisals of the sites are provided at Appendix 8 of background paper BP42 Viability Assessment.

7148 - Peter Stone Properties Ltd (Geraint John Planning)

It is not considered that this policy goes far enough to address the target and level of affordable housing need. 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.

Suggested Change

Accordingly, it is considered that inadequate provision has been made for such sites. 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.

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.

Council Response

Land at Land South of A48, Bonvilston (Site ID: 435 / 3857) was submitted through the candidate sites process but was deemed not to be suitable for further consideration BP18A Candidate Site Assessment at Deposit Plan Stage states "*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*."

7149 - Peter Stone Properties Ltd (Geraint John Planning)

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.

Suggested Change

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.

Council Response

Land at Land South of A48, Bonvilston (Site ID: 435 / 3857) was submitted through the candidate sites process but was deemed not to be suitable for further consideration BP18A Candidate Site Assessment at Deposit Plan Stage states "*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.*"

7167 - Wig Fach Property Company Ltd (Geraint John Planning)

It is not considered that this policy goes far enough to address the target and level of affordable housing need. 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. 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.

Council Response

The 3,070 affordable homes specified with Policy SP7 is that which the plan proposes to deliver through the planning system. Affordable housing led sites form part of a range of mechanisms to maximise affordable housing delivery.

7168 - Wig Fach Property Company Ltd (Geraint John Planning)

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.

Suggested Change

However, it is considered that Land at Ogmore By Sea (Site ID: 386 & 3855) 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. 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.

Council Response

Land at Ogmore By Sea was considered through the candidate site process. The site was originally submitted as a market led scheme (386) before being resubmitted as an affordable housing led site (3855) as part of the second call for sites, following the publication of the Preferred Strategy. The findings of this assessment are set out in Background Paper BP18A Candidate Site Assessment Deposit Plan Stage, where it was concluded that the site was not suitable for allocation for the following reasons "*The original site as ruled out as the development would represent unacceptable intrusion into 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*."

The suitability of HG4.3 Land at Heol Fain in Wick is considered under a separate site-specific response.

7190 - H Jones, L Sungur and P John (Herbert R Thomas)

Whilst the total 122 dwellings proposed under policy HG4 is a small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

Council Response

Comments are noted.

Policy SP7 indicates that the plan proposes to deliver some 3,070 affordable homes over the plan period. This figure reflects the amount of affordable housing the Council may secure through the planning system. It does not include affordable housing that the Council may secured through other mechanisms available such as social housing grant, capital/ revenue grant funded schemes, RSL self-funded schemes, the reconfiguration of existing stock, private sector leasing schemes, or re-utilisation of empty properties.

HG5 - AFFORDABLE HOUSING EXCEPTION SITES

A total of 8 duly made representations were submitted in respect of Policy HG5 (6 objections, 1 comment, 1 support).

The principal objection relates to the provision of affordable housing on exception sites outside settlement boundaries, with concerns raised that permitting such development could result in the unnecessary loss of open countryside, harm to ecological interests and urban sprawl. Representors argued that the delivery of affordable housing should instead be maximised on allocated sites within existing urban areas.

Conversely, a number of representations supported the principle and overall approach of permitting 100% affordable housing exception sites, with Welsh Government endorsing the policy's alignment with national planning policy and guidance. Other representations sought greater flexibility for the provision of affordable housing in smaller rural settlements where proposals are supported by local communities and help to address identified local housing needs. Suggestions included extending settlement boundaries to encompass smaller hamlets currently excluded from the RLDP settlement hierarchy. Representations also sought recognition of additional delivery mechanisms for affordable housing, including community-led housing initiatives.

STATUTORY CONSULTEE RESPONSES

5126 - Welsh Government (Planning Division)

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.

Council Response

Support is noted.

6647 - Natural Resources Wales

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”.

Suggested Change

Amened criterion 6 to: “There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

Council response

It is considered that the term ‘natural heritage’ would encompass ecology, so it is not considered that ecology needs to be considered separately.

6330- Penllyn Community Council - Object

Provide additional or amended Planning policies [either free standing or within SP3 or HG5] to allow for single unit/micro development, by companies or individuals, of appropriate, affordable housing units within all communities including ‘Hamlets and Smaller Rural Settlements’ [in the Countryside] where this is supported by the local community and meets the requirements of SSC1.

These new/amended policy statements [alongside the existing requirements of SSC1 and HG5] could then be applied across all existing settlements and communities currently classified as undefined ‘Hamlets and Smaller Rural Settlements’ and hence ‘Countryside’ to allow for controlled appropriate development of affordable homes to meet the aspirations of Para 5.24. and the local Community.

Suggested Change

Provide additional or amended Planning policies [either free standing or within SP3 or HG5] to allow for single unit/micro development, by companies or individuals, of appropriate, affordable housing units within all communities including ‘Hamlets and Smaller Rural Settlements’ [in the Countryside] where this is supported by the local community and meets the requirements of SSC1.

These new/amended policy statements [alongside the existing requirements of SSC1 and HG5] could then be applied across all existing settlements and communities currently classified as undefined ‘Hamlets and Smaller Rural Settlements’ and hence ‘Countryside’ to allow for controlled appropriate development of affordable homes to meet the aspirations of Para 5.24. and the local Community.

Council Response

RLDP Policy SP2 identifies a settlement hierarchy and sets out that the broad distribution of development within the Strategic Growth Area will be shaped by this hierarchy, reflecting the role and function of places, and directing growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision.

All settlements listed within the settlement hierarchy in SP2, both within and outside the Strategic Growth Area, will be afforded a settlement boundary. All other areas, including smaller rural villages and hamlets, outside of these defined settlement boundaries are regarded as ‘countryside’ under Policy SP3 unless specifically identified for other uses in the plan.

Policy HG5 allows for small-scale affordable housing development in areas outside settlement boundaries as 'exceptions' to the general housing policies of the RLDP. However, this applies only to proposals relating to settlements located outside the Strategic Growth Area and specifically identified in the settlement hierarchy under Policy SP2. This includes Minor Rural Settlements and the Primary Settlements of Wenvoe, Culverhouse Cross, and Wick. Exception sites will not be supported in smaller rural settlements or hamlets without a defined settlement boundary, as these locations generally lack the services and facilities necessary to support new development.

Policy SP3 does allow for the redevelopment or extension of existing dwellings, to be considered against Policy HG9. Replacement dwellings, residential extensions and the provision of annexed accommodation account for a moderate proportion of all new development in the Vale. In a countryside location it is important that such proposals are well-designed since excessively large and poorly designed proposals can individually, and cumulatively, damage both the character of the property and the local landscape. Policy HG9 therefore sets out the criteria against which determining such proposals within a countryside setting will be assessed.

New development should reflect and support the role and function of the Vale's settlements and communities, assisting placemaking and encouraging and facilitating the use of sustainable transport. Failure to respect the scale and function of places can lead to inappropriate development and result in unsustainable patterns of transportation, loss of environmental quality and local character, reduced economic prosperity and hinder social inclusion and the creation of balanced communities. The Council does not support the inclusion or amendment of policies that would allow new development beyond the criteria set out in Policy SP3, as this would be contrary to the established spatial strategy and inappropriate for hamlets and smaller rural settlements. Therefore, no change is required to the plan.

INDIVIDUAL RESPONSES

COMMENTS/OBJECTIONS

4399 – Jones - Object

100% affordable housing is government funded where site abnormal costs can be accommodated and fall outside of the normal development appraisal. As such, affordable housing schemes are more than private housing on more difficult and costly to develop brown field and contaminated sites / land. The authority's approach to allocation within private housing developments should also ensure the need is met and therefore negate the requirement to need to develop outside of settlement at all, thus preserving the natural environment and ecology

Suggested Change

As above, ensure affordable housing is delivered as part of the wider private and rented social housing allocations, preserve green open countryside, ecology and space between towns to prevent urban sprawl

Council Response

The Deposit RLDP contains several policies that will deliver affordable housing across the Vale of Glamorgan. Policy SP8 sets out the requirements for the provision of affordable housing on market housings led sites. Policy HG4 allocates sites for affordable housing led sites within rural areas, where a minimum 50% affordable housing is required. Policy HG5 also facilities the provision of 100% affordable housing sites in rural area as an exception to the general policies of the plan (i.e in areas where market housing would not be permissible). Each policy seeks to ensure that affordable housing need is delivered to meet the specific affordable housing needs of the area with which the development is located. Together these policies provide the framework for providing affordable housing to address the need, which the latest Council affordable housing evidence shows to be a Vale wide issue.

With regard to preserving the natural environment and the ecology, Policy SP20 of Deposit RLDP specifically requires all developments to avoid areas of ecological value, as well as securing the enhancement of biodiversity and the resilience and connectivity of ecosystems. With regard to urban sprawl , the plan identifies settlement boundaries around settlements to contain development and defines green wedges as a means of preventing coalescence.

4800 - Cwmpas - Comment

Paragraph 6.141 – positive comment and response within the context of Exceptions Policy HG5. However, a request would be made that as well as reference to community land trusts that wording is supplemented with suggested words of ‘and other forms and models of community led affordable housing

Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing.

It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of Local Development Plan preparation and from which the Vale of Glamorgan Deposit Plan would benefit.

Going forward, however, Cwmpas, would consider that detailed planning policy development within the Deposit RLDP could make an overt and explicit community led

affordable housing development reference and with specific community led housing policies in addition to those subsumed within more generic and general housing policies.

Firstly, the addition of a specific reference to community led housing within Policies HG1, HG2, HG3 akin to that within HG5 would enable to the benefits and reach of community led housing to be expanded into mainstream housing policies and allocations and not only Exceptions Policy.

Secondly, it would be considered as beneficial that the Deposit RLDP policies on community led housing development could include a clear definition of this type of affordable housing.

In summary, it is considered that the direct reference to community led housing in the Deposit Plan document as noted in Paragraphs 6.121 and 6.141 represent very positive inclusion and that it addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing by drafting specific community led housing policies at the RLDP Deposit Plan stage. However, as outlined, our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Suggested Change

However, a request would be made that as well as reference to community land trusts that wording is supplemented with suggested words of 'and other forms and models of community led affordable housing.'

Council Response

Comments are noted. The proposed change would be in accordance with amendments in PPW Edition 12, published in 2024, which states "*Affordable housing may also include that owned by community-led housing organisations where this meets the Welsh Government's definition*."

Proposed Change

In order to accord with this national policy definition, it is proposed to amend paragraph 6.141 as follows:

In general, the Council will require affordable housing to be delivered by a Registered Social Landlord (RSL), the Council or the community itself - for example via a community land trust **or other forms and models of community led affordable housing.**

7050 - Marion Morgan (Geraint John Planning) - Object

7152 - Peter Stone Properties Ltd (Geraint John Planning) - Object
7171 - Wig Fach Property Company Ltd (Geraint John Planning) - Object

The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported. However, 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.

Suggested Change

Replace 'no more than 10 dwellings' with 'around 10 dwellings.'

Council Response

The Council is of the opinion that the thresholds identified in Policy HG5 are appropriate and are consistent with the RLDP strategy.

This policy is similar to that of Policy MD10 of the adopted plan, which sets a threshold of 10 dwellings, but recognises that there may be scope for higher numbers in larger settlements. The RLDP relates this more strongly to the settlement hierarchy in order to provide more clarity than the adopted LDP on what is considered a large settlement.

HG6 – PROVISION OF SPECIALIST ACCOMMODATION

Two representations were received on Policy HG6. One requested that bungalows be provided as part of specialist accommodation and South Wales Police commented that all older person's housing should be built to Secured by Design Standards.

STATUTORY CONSULTEE RESPONSES

6629- South Wales Police – Secured by Design Officer - comment

All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments. All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.

Council Response

The comments are noted. South Wales Police is a statutory consultee on appropriate applications.

INDIVIDUAL RESPONSES

COMMENTS/OBJECTIONS

5542 - Entwistle - Object

More private bungalows need to be built to reflect the ageing population & free up larger houses.

Suggested Change

Build more bungalows.

Council Response

The comments are noted. Policy HG6 seeks to ensure that new developments provide for a range of housing types which would include the provision on bungalows where appropriate to the site layout and location. Policy HG6 primarily relates to the provision of housing delivered via the Council, registered social landlords or specialist accommodation providers, and may also apply to market led specialist accommodation (for example over 55 developments) where there is a requirement for developers to provide an element of social and low-cost market housing.

On affordable housing led sites Policy HG4 also requires both affordable and market housing to reflect the housing needs of the local community, thereby providing opportunities for the Council to require the provision of bungalow housing should a need be identified.

HG7 - HOUSES IN MULTIPLE OCCUPATION (HMOs)

One representation was submitted in relation to Policy HG7 from South Wales Police which highlighted the importance of early consultation with South Wales Police at the pre-planning stage, offering to assist the Council in the production of Supplementary Planning Guidance for HMOs.

6627- South Wales Police – Secured by Design Officer

South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.

Council Response

The Council note and welcomes South Wales Police's offer to work with the Council in the preparation of new supplementary planning guidance on HMOs. This will be prepared following adoption of the RLDP.

HG8 - CONVERSION AND RENOVATION OF RURAL BUILDINGS

No duly made representations were received.

HG9 - REPLACEMENT DWELLINGS, RESIDENTIAL EXTENSIONS AND ANNEXES IN THE COUNTRYSIDE

No duly made representations were received.

SP9 - GYPSY AND TRAVELLER SITE PROVISION AND GT1 - GYPSY AND TRAVELLER ACCOMMODATION

POLICY SP9 – GYPSY AND TRAVELLER SITE PROVISION

Representation ID	Respondent Name	Representation Type
4468	Mr richard mann [2799]	Object
4508	Mrs Joanne Jenkins [2780]	Object
4602	Mr David Barton [2683]	Comment
5132	Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]	Comment
5188	Mr David Reed [3156]	Object
5305	Mrs Sarah Towler [3223]	Object
5332	Mr Peter Harries [3232]	Object
5335	Mr Edward Hunt [2995]	Object
5340	Mr Peter Harries [3232]	Object
5350	Mrs Annie Price [3238]	Object
5488	Mrs Janet Reed OBE [3269]	Object
5508	Mrs Francesca Dixon [3275]	Object
5545	Mr John Melville [3289]	Object
5552	Mr David Hammond [1410]	Object
5566	Mr michael davey [3300]	Object
5593	Mr Mathew Daniels [3302]	Object
5598	Dr Ross Chidgey [3291]	Object
5599	Dr Ross Chidgey [3291]	Object
5602	Dr Beverley Evans [3306]	Object
5604	Dr Beverley Evans [3306]	Object
5605	Mr Mathew Daniels [3302]	Object
5625	Ms An Silk [3259]	Object
5626	Ms An Silk [3259]	Object
5642	Mrs Ruth Williams [3324]	Object
5719	Mr Ian Tarr [3340]	Object
5743	Mr Jonathan Vafidis [3081]	Object
5816	Ms Frances Thornton [3356]	Object
5865	Mr James Farrant [3402]	Object
5931	Mrs Gaye Bacon [3428]	Object
5954	Llangan Community Council (Clerk) [239]	Object
6061	Llangan Action Group [3438]	Object
6091	Llangan Community Council (Clerk) [239]	Object
6104	Mrs Elizabeth Davey [3476]	Object
6105	Mrs Elizabeth Davey [3476]	Object
6192	Mrs Helen Hammond [3490]	Object
6235	Ms Helen Bigley [3500]	Object
6243	Mrs Juliana Wines [3503]	Object
6484	Mr Richard Brian Antuch [3065]	Object
6948	Mr & Mrs Annie and John Williams [3325]	Object
6993	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

GT1 – GYPSY AND TRAVELLER ACCOMMODATION

Representation ID	Respondent Name	Representation Type
4982	Emma Reed [2653]	Object
5351	Mrs Annie Price [3238]	Object
5489	Mrs Janet Reed OBE [3269]	Object
5547	Mr John Melville [3289]	Object
5932	Mrs Gaye Bacon [3428]	Object
6185	Mr Darren Wines [3487]	Object
6208	Mrs Helen Hammond [3490]	Object
6217	Mrs Elana Farrant [2789]	Object
6238	Ms Helen Bigley [3500]	Object
6245	Mrs Juliana Wines [3503]	Object
6628	South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]	Comment

40 representations were submitted in respect of policies SP9 Gypsy and Traveller Site Provision and a further 11 duly made representations were made on Policy GT1 Gypsy and Traveller Accommodation. Of these, 46 representations were objections with 4 general comments.

Most representations received in respect of gypsy and travellers related to Policy SP9 - Gypsy and Traveller Site Provision, which identifies a site for 7 pitches on land at Llangan. The key issues raised related to legal and procedural issues, the view that the location is unsuitable and the scale of development is inappropriate. Concerns were also raised about access and highways access, landscape and historic environment, infrastructure constraints, flooding, policy conflicts and community impacts.

As many representors also raised site specific issues under Policy GT1 Gypsy and Traveller Accommodation, both policies have been addressed under a single composite response.

STATUTORY CONSULTEES

Four general comments were received in respect of the site for gypsy and travellers.

6993 - Dwr Cymru Welsh Water

- Water Supply - The nearest watermain is approximately 100 metres from the site.
- Wastewater - The nearest sewer is approximately 350 metres from the site.
- Wastewater Treatment Works - Penybont Merthyr Mawr is the nearest WwTW catchment to the site.

Council Response

The comments are noted and will be included in RLDP Appendix 2 and BP44 Infrastructure Plan.

Proposed Change

Add a reference to Appendix 2 and BP44 to state that the nearest watermain is approximately 100 metres from the site, the nearest sewer is approximately 350 metres from the site and that Penybont Merthyr Mawr is the nearest WwTW catchment to the site.

5132 Welsh Government

The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation. However, they note that it will be for the Council to demonstrate the site selection process and that the site adheres to PPW and is deliverable in accordance with the DPM.

Council Response

The comments are noted. The justification for the allocation is explained in BP11A Gypsy and Traveller Background Paper.

6628 South Wales Police

South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.

Council Response

The Police will be consulted at planning application stage.

INDIVIDUAL COMMENTS

4602 Barton
Traditional Architecture or best equivalent to give everyone a high quality of life on many grounds outlined.

Council Response
This is a generic response that will not specifically be relevant for the type of accommodation likely to be provided on the site.

COMPOSITE RESPONSE

Issue – Legal and Procedural

- The proposed allocation is in breach of an undertaking made by the Council in 1996.
- The proposed allocation is in breach of an agreement made by the Council in 2017.

Council Response

A significant level of concern has been raised within the representations regarding legal undertakings, agreements and expectations relating to the future use of the Llangan site. These include references to a 1996 undertaking between Mr David Foster (then Chief Executive of the Vale of Glamorgan Council) and Mr Stanley Harding of South Rise, Llangan, signed on the 1st May 1996, which states that the Council would:

1. Use its best lawful endeavours to remove from the site known and situate at OD Parcel No. 3869 ("the site") at the earliest possible date, whether by legal proceedings or other lawful means, [the site occupier] and any other person who then occupies the said site and to prevent their return; and

2. Upon the site becoming vacant to:

a) remove all structures and facilities placed on the site with all due expedition; and
b) disconnect all services that have been connected to the site with all due expedition; and
c) reinstate the said site to a condition similar to that enjoyed prior to the granting of unlawful planning permission with all due expedition.

3. Terminate the license and grazing rights granted to [the site occupier] on or about 20th December 1994 in accordance with any lawful right to do so.

While these matters are acknowledged, the Council considers that issues relating to historical legal undertakings and agreements fall outside the scope of the RLDP process, the purpose of which is to establish a strategic, forward-looking land use framework based on planning policy, evidence of need, site suitability and deliverability.

This was the position taken by the Planning Inspector appointed by the Welsh Minsters, in his report on the examination into the Vale of Glamorgan Local Development Plan 2011-2026 (LDP) 25th May 2017, following the consideration of detailed evidence presented at the examination. Paragraphs 7.7 to 7.11 of the Inspector's report are pertinent:

"7.7 A significant amount of information has been submitted in relation to the complex planning history at the allocation site. To summarise, planning permission was granted at the site for its use as a single family Gypsy and Traveller site in 1994, although that decision was challenged in the High Court. The Council subsequently became owners of the site and, following a local government reorganisation in 1996, issued a unilateral undertaking to the applicant in the High Court challenge, stating that the Council would use its best lawful endeavours to remove from the site, at the earliest possible date, whether by legal proceedings or other lawful means, the occupier of the site and any other person who then occupies the site and to prevent their return.

7.8. The Council's subsequent decision to issue proceedings to take possession of the land was stayed pending a legal challenge, with a Judicial Review taking place in 1997. This led to the quashing of the planning permission. I am informed that the Council considered recommencing eviction proceedings although, after legal advice, cancelled such plans having considered the lack of alternative accommodation available for the occupants, the best interests of the children and the extent of the interference with the occupants' human rights.

A number of representors claim that the unilateral undertaking is still extant, whilst the Council's legal advice indicates that the undertaking is not operative, with large parts of the undertaking effectively discharged by the process set out above.

7.9. The extent to which such matters render the allocation unsound was extensively debated at Hearing Session 25, with objectors contending that a legal challenge would follow should a second family occupy the site following the adoption of the LDP. However, any such challenge would need to be advanced outside of the LDP process. I recognise that such matters could impact upon the delivery of the site, which has clear implications for the soundness of the allocation. However, the legal arguments are complex, with little common ground between the parties. As such, there is considerable doubt as to whether or not a legal challenge would in fact be forthcoming and, even if it was, whether it would be successful.

7.10. For this reason, I do not consider such a matter to justify the deletion of the site from the Plan. Indeed, a threat of a legal challenge to a development allocation is not uncommon at such examinations and does not necessarily justify its omission."

The independent examination of the Deposit Plan will consider whether allocations are sound in planning terms, including their consistency with national policy, their sustainability, and their ability to contribute to meeting needs identified. It is not the role of the development plan process, nor the independent examination, to determine the status, enforceability, or interpretation of historic legal undertakings or agreements.

Therefore, while the Council recognises the concerns raised by the representors, regarding the legal agreement of 1996, these do not warrant the deletion of the site nor make the plan unsound at this stage of the RLDP process. As determined by the previous Inspector, the threat of legal challenges to development allocations is not unusual and these arguments are best addressed through other channels.

Reference is also made in the representations to a meeting held on 14 July 2017, at which the representors state that an agreement was reached between representatives of VOGC, members of the Llangan Action Group, Llangan Community Council and the site occupiers. It is claimed that it was agreed by the Council that once the family occupying the Llangan site had vacated it and moved to an alternative site at St Mary Hill, the land (which is the VOGC ownership) would be transferred to Llangan Community Council for community use. The representors contend that VOGC has departed from this agreement by rolling forward the allocation into the RLDP.

The Council's records of the meeting held on 14 July 2017 set out the Council's position that, even if the Llangan site were vacated following the granting of planning permission for the alternative site at St Mary Hill, the Council would still need to address the identified gypsy and traveller accommodation needs across the Vale as a whole. It was therefore made clear that the removal of Llangan as a gypsy and traveller allocation was dependent upon a permanent site being identified to meet the remaining need. The Council does not consider that the discussions at the meeting constituted a formal agreement.

Planning permission for the site at St Mary Hill was subsequently granted in September 2017. Aerial photography indicates that the permission was implemented and that the site has been occupied since at least 2020. Notwithstanding the provision of the alternative site, the family has not fully vacated the Llangan site.

The adopted LDP identified a need for two pitches at Llangan to meet short-term needs, together with a further 18 residential pitches to be delivered during the plan period. At the time of the 2017 meeting, it was anticipated that this need would be met through the provision of an additional permanent site (in addition to St Mary Hill), which would address both the short and long-term requirements. However, despite an extensive site search, the Council has not been able to identify a suitable site capable of meeting the level of need identified in the 2016 GTAA.

It was made clear at the 2017 meeting that the Council's position was that the removal of the Llangan allocation would only be considered through a review of the LDP if it could be demonstrated that the overall identified need across the Vale could be met at an alternative site.

The position on need has also changed with the latest GTAA (2023) identifying a need for 11 pitches. Since the publication of the GTAA, planning permission has been granted for the provision of four pitches across two private sites that were classed as unauthorised at the time of the GTAA, which has reduced the need to 7 pitches. The need for 6 of the 7 pitches is from residents living on an authorised pitch who will become adults over the lifetime of the plan and may require their own pitches.

Issue – Unsuitable Location & Scale of Development

- The proposed site is isolated within a rural location
- No services available
- Reliance on private vehicles to access services and facilities

Council Response

Representations have raised concerns regarding the rural location of the proposed gypsy and traveller site identified in Policy SP9 – Gypsy and Traveller Site Provision.

While the concerns expressed are noted, the Council maintains that the site being in a rural location is not in itself a reason for rejecting the proposal. In rural authorities such as the Vale of Glamorgan, most available land options will invariably be rural or semi-rural, and this must be balanced against the statutory duty placed on the Council under the Housing (Wales) Act 2014 to identify and meet the accommodation needs of gypsy and traveller residing in its area. Therefore, while the rural location of the proposed gypsy and traveller site is a material consideration, it is not a fundamental constraint to allocation.

Specifically, regarding the Llangan site, the long standing and continued use of the proposed site to accommodate gypsy and travellers illustrates that the location is generally appropriate and acceptable to the traveller community. Further, existing private gypsy and

traveller sites within the Vale of Glamorgan granted planning consent in recent years, are almost without exception, located within rural locations largely away from existing settlements and the services and facilities that they provide. While the Council would not wish to suggest that such locations would be acceptable to all the gypsy and traveller community, it does consider that sites in such locations are not out of the ordinary and would generally be acceptable to future residents.

Further, and as noted by the Planning Inspector appointed by the Welsh Minsters, in his report on the examination into the Vale of Glamorgan Local Development Plan 2011-2026 (LDP), following the consideration of detailed evidence presented at the examination, he found that:

7.6. Concerns have been raised regarding the suitability of the Llangan site as a Gypsy and Traveller allocation given its countryside location. However, whilst it is approximately 7.5km from the main 'Service Centre Settlement' of Cowbridge, it is within relatively close proximity to the 'Minor Rural Settlement' of Fferm Goch. As such, and bearing in mind the scale of the allocation, I do consider it to run counter to the overall spatial strategy advocated in the LDP. Notwithstanding this, national policy set out in WG Circular 30/2007138 does not preclude sites in rural or semi-rural settings, specifically clarifying that the over rigid application of national and local policies that seek a reduction in car borne travel would not be appropriate. In light of such advice, I am satisfied that the location of the site relative to facilities and services does not render the proposal unsound.

Therefore, while the strategy for the emerging RLDP has changed since the LDP was adopted, the general settlement appraisal remains largely unchanged, and the Council would contend that this assessment remains valid.

In addition to the above, while the Council now proposes an increase of five pitches (from the two pitches identified in the adopted LDP to seven pitches in the RLDP), it considers that this represents a modest and proportionate expansion of the site and that overall, the scale of development remains appropriate to the rural context.

In assessing the acceptability of the increased provision at the site, the Council has considered whether it can be appropriately designed to accommodate the proposed level of provision. In this regard, initial layout work undertaken by the Council demonstrate that the site can accommodate seven pitches in a well-spaced, low-density arrangement, with adequate internal circulation, safe vehicular access, and sufficient space for landscaping and boundary treatments. Such detailed design measures undertaken at the planning application stage, would enable the development to be visually contained and responsive to the surrounding landscape, ensuring that the rural character of the area is respected.

Furthermore, detailed design and infrastructure mitigation at the planning application stage would allow for appropriate screening, drainage solutions and servicing, thereby addressing other concerns that have been raised through the Deposit Plan consultation that question whether the site can be appropriately integrated without unacceptable adverse impacts.

Issue – Access and Safety

- Substandard highway access, narrow lanes, unsuitable for large vehicles such as caravans/trailers.
- Poor access for emergency service vehicles.
- Unsafe pedestrian routes to/from the site.

Council Response

Representations raise concerns in relation to site access and safety, including the constrained nature of the local highway network, substandard access widths, limitations on access for emergency service vehicles, and the absence of any local pedestrian infrastructure. Representations also raise concerns about the condition and suitability of the local highway network to accommodate the type and intensity of vehicular movements associated with the proposed use.

While the Council acknowledges the concerns in respect of access and safety, such issues are not uncommon in a rural location and do not in themselves demonstrate that the site is unsuitable for development, although it is acknowledged that improvement works would be required, however this is not considered unusual for any proposed development. In this regard, any improvements required to the site would be in accordance with "Designing Gypsy and Traveller Sites" (Welsh Government 2015) which sets the relevant benchmark for designing Gypsy and Traveller sites in Wales and sets out clear expectations regarding the provision of appropriate on-site facilities, servicing and infrastructure. Further, it is relevant that the site has a longstanding use as a Gypsy and Traveller site with no evidence that the existing access arrangements have caused access issues or resulted in unacceptable highway safety impacts, including access for larger vehicles and emergency service vehicles.

In this regard, at the previous LDP examination, the Inspector found that:

7.12. …. It is clear that access and drainage works would need to be improved for the site to meet WG guidance. However, a single pitch has been occupied on the site since 1994 and the LDP proposals would not significantly intensify its use in real terms. Moreover, despite significant anecdotal evidence being submitted at the Hearing, I have not seen anything from the highway authority or a statutory undertaker to indicate that such matters could not be adequately resolved through the development management process. For these reasons, and having fully considered all matters raised, I conclude that the allocation is sound.

Therefore, while the Council acknowledges the concerns raised regarding highway access and safety, it considers that such matters would be approximately considered in detail at the planning application stage, where technical assessments and supporting transport and engineering evidence would be required to demonstrate that safe and suitable access to the site for the level of use proposed could be secured.

Issue – Landscape & Historic Environment

- Site within a Special Landscape Area.
- Impact on Llangan Conservation Area and its setting.
- Visual Impact and erosion of countryside character.

Council Response

Representations raise concerns regarding the site's location within a Special Landscape Area (SLA), its relationship to the Llangan Conservation Area, and the potential impact of development on the rural character, visual amenity and openness of the surrounding countryside.

While the concerns regarding the site's location within the SLA are noted, the Council would advise that the SLA are not intended to prevent development. Rather, and as set out within paragraph 6.414 of the Deposit Plan, they are intended *"to ensure that where development is acceptable careful consideration is given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."* Paragraph 6.415 of the plan then sets out that any such development within SLAs will be required to fully consider the impact of the proposal on the SLA through the submission of a Landscape and Visual Impact Assessment (LVIA).

Therefore, while accepting the proposed site's location within and Upper & Lower Thaw Valley SLA, the Council considers that any adverse impacts arising from the proposed development on the SLA would be adequately addressed through this mechanism and that such matters would be fully considered through the planning application stage where such matters as the scale, layout and visual integration of development can be controlled through sensitive siting, structural landscaping and screening, ensuring that the proposal responds appropriately to its rural context.

Similar concerns have been expressed in the representations regarding the proposed sites impact on the Llangan Conservation Area and its setting. Again, while acknowledging these concerns, the Council considers that such matters do not preclude the sites allocation and are more appropriately addressed through the development management process.

This position was again supported by the previous planning inspector in paragraph 7.12 of his report

7.12. Other concerns have been raised in relation to: the effect on the Llangan Conservation Area; the effect on the Upper and Lower Thaw Valley SLA; the ability to achieve a safe access to the site; and the ability to achieve satisfactory drainage. However, given the distances from the Llangan Conservation Area I am satisfied that, subject to detailed design, the site could be brought forward with a neutral impact on the designation. Similarly, an SLA does not preclude development from coming forward, with detailed design capable of being addressed at a planning application stage.

Issue – Infrastructure Constraints

- Flood risk
- Drainage sewer issues
- Lack of utilities capacity

Council Response

The Council notes the concerns raised regarding flooding at the site. The Flood Map for Planning indicates that the site is not at risk of sea or river flooding. There is a small watercourse on the northern boundary of the site. However, the extent of the flood risk area associated with this does not extend to the developable area of the site or affect any potential access.

The concerns raised by respondents regarding a lack of infrastructure at the site are noted however, the Council is fully aware that in proposing the site for development significant improvements would be required to the site. As detailed above, any improvements required to the site would be in accordance with "Designing Gypsy and Traveller Sites" (Welsh Government 2015) which sets the relevant benchmark for designing Gypsy and Traveller sites in Wales and sets out clear expectations regarding the provision of appropriate on-site facilities, servicing and infrastructure. Such matters would be fully considered through the planning application process. As such any existing infrastructure issues at the site would be fully addressed at the design stage.

The development will also need to incorporate a Sustainable Drainage System (SUDs) scheme which is approved by the Council through the SuDS Approval Body (SAB) before development can commence. The use of SuDS mimics natural drainage, managing surface runoff at or close to the surface and as close to its source as practicable, controlling the flow (volume and rate of runoff) and providing a range of additional benefits. The outcome of this is that issues associated with flooding and drainage should be dealt with on site and prevent any detriment offsite impacts.

Issues – Policy Conflict

- Fails to meet criteria of RLDP Policy GT1 and other policies of the Plan.

Council Response

Representations raise concerns regarding policy conflict between the proposed allocation of Policy SP9 Gypsy and Traveller Site Provision, and other policies of the Plan, including inter alia Policy GT1 – Gypsy and Traveller Site Accommodation as well as those relating to landscape, environmental protection and infrastructure.

While the Council notes the concerns, it would suggest that they arise through a selective reading of individual policies and/or policy criteria rather than a reading of the RLDP as a whole framework for identifying and managing development. In this context, the Plans policies function collectively rather than as standalone constraints to development. Often the Plan contains complimentary but sometimes competing objectives including protecting

the natural and built environment; promoting sustainable patterns of development; ensuring safe access and adequate infrastructure and meeting identified housing needs, including Gypsy and Traveller accommodation.

In this regard, the identification of sites is often a balanced judgement between environmental and infrastructure considerations and the requirement for the Council to meet its obligations under national policy and legislation such as housing need.

Issue – Community Impacts

- Loss of agreed community use – allotments
- Potential social tensions and increased pressure on local community facilities.

Council Response

The concerns regarding the loss of the site for community use have been addressed above.

While the concerns regarding social tensions both on the proposed site and within the external communities, the Council considers that the proposed allocation represents a modest and proportionate expansion of the site and that overall, the scale of development remains appropriate to the rural context and that it is unlikely that social tensions would prevail, with the site having a long standing use for Gypsy and Travellers.

In respect of tensions within the site, appropriate site management arrangements would be implemented by the Council to ensure that the occupation and day-to-day operation of the site supports positive relations and compatibility between resident households.

Issue – Deliverability

- Is the site deliverable as it has been allocated previously and not brought forward.

Council Response

The adopted LDP makes provision for two pitches on the Llangan site, and it continues to be partially occupied by one gypsy and traveller family. As addressed above, there has been an extensive site search for alternative sites to meet a higher level of need that exceeded the notional capacity of the Llangan site.

Due to changes in circumstances on other sites, including provision being met on private sites and tolerated sites, the need figure in the 2023 GTAA is now lower and at a level that can be accommodated on the Llangan site. The site is in Council ownership and the principle of development as a gypsy and traveller site has already been established through the site's allocation in the adopted LDP.

ANNEX 5 - HOUSING SITES

HG1 - HOUSING ALLOCATIONS (POLICY GENERAL)

Representation ID	Respondent Name	Representation Type
5103	Mr Hector Townsend [3127]	Object
5105	Mrs K Mason [3129]	Object
5302	Mr Huw Allaway [2434]	Object
5429	Mrs Susan Evans [712]	Object
5454	Ms Ann Barnaby [1702]	Object
5462	Mr David Entwistle [3264]	Object
5465	Mr David Entwistle [3264]	Object
5648	Mr David Entwistle [3264]	Object
5817	Mr William Hart [1009]	Object
5943	National Grid Electricity Transmission [434]	Comment
5953	Mr Richard Cobourne [3440]	Comment
6069	Barratt Redrow Homes [2669]	Object
6378	Mrs Jaqueline Hughes [3563]	Comment
6502	Vicky Jewell [3610]	Comment
6509	Vale of Glamorgan Council Conservative Group [3614]	Object
6533	Barry & Vale Friends of the Earth [708]	Comment
6534	MS Andrew R T Davies [1324]	Object
6582	Councillor Stephen Haines [1029]	Comment
6719	Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]	Comment
6966	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7035	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
7038	Marion morgan [2413]	Object
7073	Barratt Redrow Homes [2669]	Comment
7074	Barratt Redrow Homes [2669]	Object
7105	Barratt Redrow Homes [2669]	Comment
7138	Peter Stone Properties Ltd [1182]	Object
7160	Wig Fach Property Company Ltd [2373]	Object

A total of 27 Representations were submitted in respect of Policy HG1 – Housing Allocation (16 objections and 11 comments), raising a number of issues that apply generally to housing allocations identified within the Policy. It should be noted that in the representations where specific sites have been referred to, rather than growth areas, the Council has provided detailed responses to these sites separately.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

The issues raised include infrastructure capacity and service constraints, the scale and distribution of growth and the site selection process.

There are also several individual responses which are dealt with separately below.

STATUTORY CONSULTEE RESPONSE

5943 - National Grid Electricity Transmission (Lucy White Planning Limited) - Comment

NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers. In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost-effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons. Advice is given on allocating land affected by high voltage power lines and the steps required for connection to the distribution network.

NGED has no site-specific comments on the proposed allocations within the Deposit Draft Plan.

Council Response

The comments are noted.

6966 – Dwr Cymru Welsh Water – Comment

Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.

Council Response

The comments are noted. Site specific comments have been recorded as part of the response to the individual sites.

6719 - Cardiff and Vale University Health Board - Comment

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference "enhancements to leisure, sport and recreation spaces". Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning

application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation.

Council Response

In respect of open space provision, where appropriate, individual key site policies have indicated the amount of open space to be provided - the type and location of these will be finalised at the planning stage. Elsewhere open space provision will be assessed against the requirements set out in Policy CI1 - Open Space Provision, whilst open space standards are set out in the Council's Supplementary Planning Guidance.

7035 – Natural Resources Wales – Comment

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.

Council Response

The comments are noted. Site specific comments have been recorded as part of the response to the individual sites.

INDIVIDUAL RESPONSES

6069 - Barratt Redrow Homes (Lichfields) - Object

Cowbridge, as a Service Centre Settlement, is underrepresented in housing allocations in Policy HG1, with only 105 units allocated and no major land bank sites. As such, the housing allocations in Policy HG1 do not align with Cowbridge's ranking as a Tier 2 settlement in Policy SP2. This under-provision limits Cowbridge's ability to meet housing needs, especially affordable housing, despite its importance within the hierarchy. An additional site at Land at Primrose Hill, capable of up to 220 dwellings, could help address this gap and support the RLDP's growth strategy.

Council Response

In respect of allocating additional housing within Cowbridge, the RLDP includes the provision of the existing adopted LDP housing allocation Land adjoining St Athan Road (RLDP site reference HG1.6) for 105 dwellings, and the housing land supply trajectory at Appendix 1 of the RLDP indicates there to be a further 275 dwellings (either under construction or not started at April 1st 2025) within Cowbridge. The Council is of view that appropriate level of housing is proposed for the settlement.

7073 - Barratt Redrow Homes (Highlight Planning) - Comment

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations.

Council Response

Comments are noted

7105 - Barratt Redrow Homes (Turley) - Comment

The table should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility. The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations, can bear the cumulative policy costs of the RLDP, including CC1.

Council Response

The number of dwellings for each site reflect that which has either been approved or where site promoters have provided masterplans to illustrate site capacity, caveating that the site capacities are indicative would undermine the plan's ability to evidence that the housing requirement will be delivered. Flexibility is built in the overall housing requirement through the total site allocations in the plan of sites rather than individual sites.

Sites have been subject to site specific viability testing which verify that the infrastructure requirements can be supported. This is set out within BP42 Viability Assessment. An independent financial viability assessment of key sites has also been carried out (BP42A). An assumption for a cost uplift net zero buildings has been factored into both the high-level viability work and site specific assessments, alongside other policy requirements.

5953 - Mr Richard Cobourne

Housing — land to the south of Millands Farm etc.

HG1(5), HG2(21) and HG2(3)

I am silent on this proposal

Council Response

The comments are noted.

6502 – Jewell - Comment

The term "unit" is undefined in the documents. Does it refer to an entire block of flats/apartments or a single flat within a block? Clarification is needed on the number of units/blocks and flats/apartments per block planned for the Weycock Cross, Barry and other sites.

Council Response

In planning terminology, the term 'unit' refers to a single, self-contained residential property. Therefore, an individual house is one unit, and a single flat or apartment within a residential block is also one unit. Specific details regarding the precise mix of housing types and the design of any individual apartment blocks will be considered at detailed planning application stage.

COMPOSITE RESPONSE

Issue - Infrastructure Capacity & Service Constraints

- Existing infrastructure cannot support the scale of growth.
- Health services and schools are at or beyond capacity.
- Better coordination needed with health boards, transport bodies, and service providers.
- Roads already congested - developments would cause "gridlock."
- Poor public transport.
- Insufficient detail on when and how supporting infrastructure will be delivered.
- Clear phasing triggers required.

Council Response

Infrastructure Capacity

The Council acknowledge that new development may require the provision of additional supporting infrastructure to mitigate the impact that new development may have. In this regard in preparing the Deposit Plan the Council has undertaken an assessment of the likely impact of the proposal. The Infrastructure Plan accompanying the Deposit RLDP sets out the infrastructure requirements for each site, and these requirements are reflected within the Deposit Plan Policies. The cost to the developer for this additional infrastructure has been accounted for within site specific viability testing to ensure that the requirements can be supported by the development, as set out in BP42A Independent Financial Viability Assessments of Key Sites. This has also been factored into high level testing as part of a wider contribution towards planning obligations in BP42 Viability Assessment.

Specific infrastructure provision is discussed in the responses below.

Health Provision

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes Barry and areas to the west, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

In the Eastern Vale which includes Dinas Powys and Penarth, the Primary, Community and Intermediate Health Care assessment indicates that the overall position has stabilised following the UHB's acquisition of Redlands Surgery. While some capacity exists, future growth depends on developing integrated facilities in partnership. The proposed Wellbeing Hub at Penarth Leisure Centre is currently paused due to updated flood risk data from Natural Resources Wales (NRW), with no alternative site or funding identified to progress the Outline Business Case. The UHB is exploring a potential integrated services development at Cosmeston Farm, in collaboration with the Council and aligned with Section 106 opportunities. The assessment indicates that while there are no immediate plans to increase the number of commissioned providers/services Whilst it is anticipated that there may be some capacity within the existing GMS resource, the ability to absorb future growth within this area will be reliant on the development of integrated wellbeing solutions and the adoption of new ways of working.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented in 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

With regard to emergency services, these organisations are statutory consultees to the Replacement LDP and as such have been formally contacted in respect of the proposed

housing growth. No issues have been raised by the emergency services in respect of the RLDP.

Education Provision

In respect of educational provision, the Council has undertaken an assessment of educational need generated by new developments in respect of forecast future school places for nursery, primary and secondary education (BP43 Education). This clearly sets out the number of pupil places that are likely to be generated by new developments and the capacity of individual catchment schools (English Medium, Welsh Medium and denominational schools at nursery, primary and secondary level) to accommodate additional pupils. Where it is forecast that there may be insufficient capacity in the future, there will be a requirement for a financial contribution towards the provision in the future.

It should be noted that whilst certain schools may be at capacity currently, there has been a significant fall in birth rates in recent years and the number of surplus places at many nursery and primary schools across the Vale is forecast to increase. This will in turn follow through to secondary schools places later in the plan period.

Highway infrastructure

The Council acknowledge that the proposed RLDP housing allocations have the potential to increase traffic flows with the Vale of Glamorgan. Accordingly, in preparing the Deposit Plan, the Council has sought to identify the potential impacts and, where necessary, the measures that will be required to mitigate the impact of RLDP developments on the strategic highway network.

In considering the traffic implications associated with the Key Site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of collective development proposals on the strategic transport network and to identify mitigation measures where necessary. The STA is supplemented by site-specific transport evidence submitted in support of relevant sites. The full STA assessment is set out in Background Paper BP14 Strategic Transport Assessment - Stage 1 and BP14A Strategic Transport Assessment - Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a review of baseline transport conditions in the Vale of Glamorgan and examines the existing transport infrastructure and its current operational state, including the strategic highway network. The Stage 2 STA comprises a series of technical notes covering Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation, and Cost Estimation and Funding Mechanisms.

The STA uses the Transport for Wales South East Wales Transport Model (SEWTM) as the strategic modelling basis, supplemented by industry-standard detailed junction modelling

software (TRL Junctions 11 and JCT LinSig). The strategic model covers the Cardiff Capital Region and provides a recognised basis for assessing the cumulative impacts of strategic housing allocations on the strategic highway network. The assessment considers two principal forecast scenarios:

- 2036 Base Scenario - representing future background traffic growth to 2036, excluding traffic from the RLDP strategic housing sites.

- 2036 RLDP Scenario - representing the 2036 Base scenario plus traffic associated with the identified RLDP strategic housing sites.

The 2036 Base Scenario includes forecast background traffic growth derived from TEMPro/NTEM, which takes account of wider changes in population, households, employment, car ownership and economic activity. This means that forecast job growth, regional housing growth and general traffic trends within the Vale of Glamorgan and the wider South East Wales region is accounted for within the strategic assessment. The 2036 RLDP Scenario then adds the traffic associated with the strategic housing allocations, allowing the specific cumulative impact of those housing sites to be identified against a future-year baseline that already reflects wider background growth that would occur regardless of the strategic housing allocations. The traffic data and modelling approach used in the STA are standard techniques and are appropriate and proportionate for plan-making.

Technical Note 5 of the STA provides a detailed assessment of the forecast cumulative impact of the proposed RLDP housing allocations on 17 highway network junctions.

For junctions where mitigation is identified as appropriate, the STA considers feasibility designs which have been prepared to demonstrate that mitigation is achievable and can restore operation to better, or similar to, 2036 Base levels. While further design stages will be necessary, the feasibility designs are proportionate to the requirements of the RLDP and demonstrate that a scheme is viable to a reasonable degree of certainty.

The Deposit Plan clearly sets out the requirement for each relevant site to contribute towards mitigating the impacts of development, where justified. Technical Note 8 sets out an indicative cost estimate and apportionment methodology for relevant strategic highway improvements. Any contributions would be secured through Section 106 planning obligations at planning application stage and would need to meet the statutory tests, namely that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

At planning application stage there will be a requirement for proposals to be supported Transport Assessment, where necessary. However, the level of detail that is included in the RLDP and supporting documents is considered to be sufficient to justify that in principle the allocations are deliverable and can mitigate against any impacts on the highway network.

Public Transport

The Deposit Plan sets out the requirements for the provision of active travel routes and improvements to sustainable transport services for each of the housing allocation, as reflecting the plan's objective to "Promoting Active and Sustainable Travel Choices".

Additional improvements to sustainable transport shall also be explored and appropriate contributions secured in the line with the Council's planning obligations standards. Appendix 2 Infrastructure Delivery Plan contains an initial assessment by the Council of the necessary infrastructure contributions that will be required for each housing allocation including contributions for sustainable transport measures. The aim of these improvements would be to ensure that active travel provides a safer alternative option for journeys and would allow for improved accessibility from the site to existing and those proposed.

Additionally, the Council shall ensure that future development will provide improvements to active travel and enhance accessibility to public transport and active travel. An assessment of the most appropriate and convenient active travel routes shall be undertaken at the planning application stage, where further detailed site masterplanning shall enable the identification of active travel improvements within and surrounding housing allocations. This may include but is not limited to upgrades to existing and new pedestrian access and active travel measures for walking, wheeling and cycling.

Delivery of Infrastructure and Phasing

The mechanisms for securing these monies will be via S106 planning contributions at the planning application stage.

The Deposit RLDP Infrastructure Plan (BP44) sets out the infrastructure requirements for each proposed housing allocation in the plan, likely delivery mechanisms and potential timescales. This is also summarised in Appendix 2 of the Deposit Plan. The costs associated with each key housing allocation have been accounted for in the site-specific viability assessment undertaken and are considered both appropriate and deliverable as set out in Background Paper 42A Independent Financial Viability Assessments of Key Sites.

Issue - Scale and Distribution of Growth

- Too many houses proposed overall.
- Not enough houses.
- Lack of demonstration that growth levels are proportionate or deliverable.
- Cumulative impacts of multiple allocations in one location.
- Growth in certain settlements (e.g. St Athan) disproportionate and excessive.

Council response

The scale of housing has also been considered in response to representations on Policy SP6.

In response to the objections made to the proposed the housing requirement either being too high or too low, the Council maintains that the requirement of 7,890 dwellings (526 dwellings per annum), with a flexibility allowance increasing total provision to approximately 8,600–8,700 dwellings, is robustly justified, evidence-based, regionally appropriate and fully aligned with the Sustainable Growth Strategy of the Deposit Replacement Local Development Plan. The Council has embedded the identified housing requirement within the Deposit Plan's strategy through the spatial distribution of housing allocations and employment growth to deliver a balanced level of housing and employment growth in sustainable locations.

In considering the level of housing growth appropriate for the Vale, the Council explored a range of demographic and spatial options and assessed these in relation to the demographic and economic outcomes, alongside the character and role of the Vale's settlements and the wider regional relation of the Vale of Glamorgan. The evidence for this contained within the Council's Housing and Employment Growth Options Background Paper (BP7), demographic modelling in BP8 (Demographic Evidence) and BP8A (2022-based WG Projections).

The preferred growth option of 526 dwellings per annum seeks to provide a level of housing growth that would balance outward and inward migration levels that will contribute towards addressing the Vale's long-term increase in ageing population. A lower growth scenario would, as indicated in BP8, result in an ageing population profile and a decline in the working age population. These outcomes would undermine the economic and social objectives of the Deposit Plan. In addition, a lower level of growth would result in the provision of less affordable housing across the Vale of Glamorgan, which the RLDP has highlighted as key issue given the significant level of need identified in the Local Housing Market Assessment.

Conversely, seeking a higher dwelling requirement would require sustained and elevated levels of inward migration to the Vale beyond historic and realistic trends, thereby introducing uncertainty and delivery risk.

Finally, in considering housing growth, the Council has also sought to seek a balance level of both housing and employment growth identified with the Council's Employment Land Study (BP 12) with the level of housing proposed in the Deposit Plan closely aligning with the potential annual job forecasts identified in BP12. Increasing the level of housing growth as proposed would create a mismatch between housing growth and jobs growth, which would also increase the probability of outward commuting and unsustainable travel patterns which in the Vale are already the highest in the region (see BP7 figure 14), and for which the Council is seeking to redress through the RLDP.

Consequently, the Council consider that the level of growth and the spatial distribution of housing provision set out in Policy HG1 is intrinsically linked to the spatial strategy of the Deposit Plan, consideration of the role and character of the Vale of Glamorgan settlements and infrastructure capacity. This is further illustrated within the spatial distribution of housing which is provided at Table 3 of the Deposit Plan with the majority of growth directed in line with the spatial growth strategy (Policy SP1).

In addition, Welsh Government representations on the Deposit Plan have not raised fundamental objection to the overall scale of housing growth or the methodology underpinning Policy SP6. This indicates that the Council's approach to deriving the housing requirement, through the integration of demographic evidence (BP8, BP8A), growth and spatial option testing (BP7), and alignment with national policy, is consistent with the expectations of the Development Plans Manual and Planning Policy Wales.

In response to the cumulative impact of multiple allocations in one location, this has been considered extensively through the evidence base, including in respect of health, education and the highways network, as explained in detail previously.

The spatial distribution of housing supply is shown in Table 3. Representations on the spatial distribution have also been made in respect of this Table and the spatial distribution has therefore been considered as part of the response for SP6, Table 2 and Table 3.

The comments around the spatial distribution of developments are acknowledged, with respondents raising concern about there being more than one allocation in certain settlements. Specific concern is raised about St Athan, where two key sites are identified.

St Athan is identified as a primary settlement within the Strategic Growth Area and should therefore be a focus for new development. The settlement is adjacent to the largest employment allocation in the RLDP at Bro Tathan Enterprise Zone, and is in close proximity to the Employment Regeneration Opportunity Area at the former Aberthaw Power Station. A level of housing commensurate with the area's role as a focus for employment growth is therefore considered appropriate in order to deliver the key component of the strategy to align locations for new housing, employment, services and facilities to reduce the need to travel. The provision of new large housing developments in St Athan will also facilitate the delivery of additional facilities including retail and community facilities.

Issue - Spatial Strategy & Site Selection

- Sites do not align with the stated settlement hierarchy or sustainability principles.
- Allocations do not adequately support affordable housing delivery where needed.
- Some allocations are outside key/primary settlements.
- Appears driven by available land rather than evidence-based planning.
- Under-provision in certain settlements (e.g. Cowbridge) relative to their status.
- Allocated sites outside of key or primary service settlements should be removed.

Suggested changes

- Re-allocate sites to more sustainable locations
- Remove sites outside key settlements

Council response

As evidence by the Council, the housing growth proposed has been fully aligned with the Deposit Plan's Sustainable Growth Strategy, which seeks to focus development in the most sustainable locations within the Vale, consistent with the settlement hierarchy and with access to services, employment and transport networks.

In considering sites suitable for allocation in the Deposit RLDP, all sites submitted to the Council through the call for candidate site stages of the plan have been appraised against the Council's candidate sites assessment methodology and process. The site assessment process forms part of the Council's RLDP background and has informed the identification of potential spatial growth options and the development of the RLDP Strategy. Details of the methodology is set out in Background Paper 16. Part of the selection process considered the suitability of sites in respect of their 'Spatial Fit' with the RLDP Growth Strategy, Strategic Objectives and Settlement Hierarchy. Consequently, consideration of sites in line with the RLDP strategy has been integral to the section of the housing allocations set out in Policy HG1, aligned to the role and function of settlements and detailed within the RLDP settlement hierarchy.

Similarly, the allocation of sites and availability of sites has been considered against evidence on local affordable housing with housing directed to those settlements. It should be noted that the LHMA evidences a need for affordable housing in all wards within the Vale, which justifies the provision of housing in all areas.

The need is highest in Barry and as a consequence, land has been allocated for housing in the town. This includes a new key site at North West Barry, which will deliver 30% affordable housing. In addition, all four of the other housing allocations in Barry (HG1.1-HG1.4) are being brought forward by social housing providers, which will ensure high levels of affordable housing delivery.

The second highest level of need is in Penarth/Llandough where provision has been made for 576 units at Cosmeston and 133 units at Land south of Llandough Hill. Both sites form part of the major land bank.

It is accepted that there are a small number of rural affordable housing led allocations made on sites located outside of key settlements, service centres and primary settlements. The provision of rural affordable housing led sites is a key component of the strategy. This and is discussed in further detail in the response to HG4.

In response to the comment that allocations appear to be land driven rather than evidence based, it should be acknowledged that there are many factors that must be considered when making provision for housing and the availability of deliverable land is a key consideration. If there are a limited number of deliverable sites in a settlement due to constraints, then this will influence the level of provision that can be made.

It should be noted also that the plan does not start from a blank slate, and many areas have committed sites that influence the spatial distribution. Notwithstanding this, all sites have been subject to a robust assessment and accord with the RLDP sustainable growth strategy.

In respect of the perceived under-allocation within Cowbridge, the RLDP includes the provision of the existing adopted LDP housing allocation Land adjoining St Athan Road (RLDP site reference HG1.6) for 105 dwellings, and the housing land supply trajectory at Appendix 1 of the RLDP indicates there to be a further 275 dwellings (either under construction or not started at April 1st 2025) within Cowbridge. The Council is of view that appropriate level of housing is proposed for the settlement.

Issue- Over-reliance on Strategic / Key Sites

- Housing supply concentrated in key sites.
- Delivery uncertainty (phasing, viability, timing).
- Lack of flexibility in the supply pipeline.

Proposed Suggested Change

Include more medium-sized, deliverable sites to diversify supply

Council response

With regard to representation made in respect of the Council's over reliance on an existing housing land supply and limited Key housing allocations. The housing land bank detailed within BP9A consist of housing sites with planning permission and or under construction on April 1st, 2025. The majority of these sites consist of existing adopted plan sites that have extant planning permissions, for which the council has engagement with site promoters to ensure that the sites commitment to deliver these sites within the timescales of the RLDP.

The 5 key sites contribute to only just over a quarter of the overall housing provision. The majority of the other housing allocations would be considered to be medium size (between 10 and 100 dwellings), with 4 affordable housing led sites also being medium in scale. There will also be a pipeline of windfall sites likely to be delivered.

There is a requirement for a housing trajectory to be provided which gives indicative timescales for the delivery of specific sites. This is set out in Appendix 1 of the RLDP. This has been prepared in consultation with the site promoters and represents what is a realistic estimate of likely timescales for delivery.

Issue - Viability & Deliverability

- Question whether all sites are viable and deliverable, the ability of sites to absorb cumulative policy costs.
- Lack of clear viability evidence at candidate site stage.

Council response

The housing allocations identified in Policy HG1 consist of sites granted planning permission where the issue of deliverability and viability has been considered in the determination of the planning applications. For other sites, including keys sites proposed within the RLDP, these have been the subject of extensive scrutiny by the Council including site specific viability appraisals and a wide range of background evidence has been provided by site promoters in support of these sites. The evidence base includes a viability assessment (BP42) and an independent review of key sites (BP42A). Both documents consider the cumulative impact of policies including Section 106 requirements and the operational net zero policy.

The front loading of the evidence base for these sites alongside continued dialogue with site promoters in preparation of the Deposit Plan will reduce the leading times for the preparation of information required at the planning application stages, and this has been reflected in the timescales set out in the housing trajectory which accompanied the deposit plan.

Issue - Environmental & Green Infrastructure Impacts

- Loss of greenfield land and countryside.
- Effects on biodiversity and landscape fragmentation.
- Need for stronger green infrastructure strategies, explicit consideration of protected species and better-designed layouts to minimise ecological harm.

Council response

A key objective of the RLDP is to protect and enhance the natural environment. The strategy seeks, wherever possible, to favour the re-use of previously developed land. However, the evidence base recognises that there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth within the Vale of Glamorgan over the plan period and accepts that greenfield land will also therefore need to be released.

Housing allocations within the plan have been the subject of Preliminary Ecological Assessments (PEA) in line with national planning policy and legislation. PEAs are the first-stage ecological survey used to identify ecological constraints, protected species, habitats, and biodiversity opportunities on a site. Further detailed ecological assessment will be undertaken in support of any future planning applications. In addition all new developments in Wales required under planning policy to secure a 'Net Benefit for Biodiversity' aimed at improving ecosystem resilience – this requirement is reflected in RLDP Policy SP20 Biodiversity and Ecosystem Resilience, placing a requirement for all new development to maintain and enhance biodiversity by ensuring development does not cause any significant loss of habitats or populations of species and provide a net benefit for biodiversity and improved ecosystem resilience.

Furthermore, Policy SP19 Green Infrastructure requires all developments to undertake a Green Infrastructure Assessment (GIA) has been completed to inform site layouts in order to integrate green spaces that enhance biodiversity ad increase ecological resilience. A further aim of GIA is to create opportunities for ecological connectivity of green spaces (both manmade and natural). In this regard GIA have been undertake and informed the outline master plans of the Key Site allocations set out in the Deposit RLDP.

Council's Overall Response

Following detailed review of the representations submitted in relation to Policy HG1, the Council acknowledges the breadth of concerns raised in respect of the housing allocations listed within the policy. Infrastructure delivery and appropriate mitigation will be essential to ensure that the quantum development from the housing developments proposed over the RLDP period shall come forward in a coordinated and timely manner, with the provision of infrastructure to support each site being assessed by the Council and set out in the RLDP infrastructure plan. Further mitigation details will be required at the planning application stage and controlled by appropriate planning conditions.

Therefore, the Council considers that the allocations set out in Policy HG1 remain sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocations within the RLDP

KEY SITES

This section sets out the representations made on the five key sites identified under Section A of Policy HG1 Housing allocations:

- KS1 Land at North West Barry
- KS2 Land North of Dinas Powys
- KS3 Land at Readers Way, Rhoose
- KS4 Land at Church Farm, St Athan
- KS5 Land to the west of St Athan

HG1 KS1 LAND AT NORTH WEST BARRY

Representation ID	Respondent Name	Representation Type
4459	Mrs Katie Smith [2792]	Object
4479	Mr Tim Gordon [2566]	Object
4494	Mr Simon Parker [2821]	Object
4552	Mr Rhys Williams [2851]	Object
4588	Mr David Barton [2683]	Comment
4670	Mr Tim Griffiths [2578]	Object
4671	Mr Tim Griffiths [2578]	Object
4672	Mr Tim Griffiths [2578]	Object
4673	Mr Tim Griffiths [2578]	Object
4675	Mr Tim Griffiths [2578]	Object
4688	Professor Andrew Vincent [920]	Comment
4715	Professor Andrew Vincent [920]	Object
4726	Mrs Mary Vincent [2657]	Comment
4773	Mrs Deborah Bobbett [2650]	Object
4789	Mrs Joanna Phillips [2949]	Comment
4809	Mr LP Lazarou [2528]	Object
4817	Alan B Luen [2966]	Object
4847	Jane Buckland [2573]	Object
4876	Mr David Holloman [2663]	Object
4878	Miss Isobel Govier [3001]	Object
4894	Jordan Mountford [3006]	Object
4922	Mrs Ruth Zeraschi [2791]	Object
4941	Mrs Tracey Govier [3027]	Object
4947	Mrs J Davis [2595]	Object
4948	Mrs Lynette Griffin [3033]	Object
4949	Miss Matilda Griffin [3034]	Object
4950	Mr Mathew Griffin [3035]	Object
4952	Miss Ellie Griffin [3036]	Object
4963	Vanda Cattle [3041]	Object
4964	Vanda Cattle [3041]	Object
4991	Mr Stephen Vaughan [3060]	Object
4993	Mrs Elizabeth Everitt [3062]	Object
4997	Mrs Helen Skehens [795]	Object
5000	Mr Ian Allwood [2846]	Object

5029	Mr Michael Hatter [3086]	Object
5030	Mr Steven Helm [3088]	Object
5032	Mrs Cath Bevan [2658]	Object
5040	Ms Shelley Baker [3094]	Object
5053	Mr Colin Crayford [3099]	Object
5059	Miss Rachel Ward [3108]	Object
5068	Mr Stephen Vaughan [3060]	Object
5106	Mrs Anne Sloman [668]	Object
5135	Ms Suzanne Portingell [3138]	Object
5156	Mr David Taylor [2567]	Object
5200	Mr Darryn Cross [2549]	Object
5201	Mr Darryn Cross [2549]	Object
5202	Mrs Emma Bartlett [3164]	Object
5203	Mrs Sian Bartlett [3165]	Object
5204	Mr Darryn Cross [2549]	Object
5205	Mr Darryn Cross [2549]	Object
5206	Mr Darryn Cross [2549]	Object
5207	Mr Darryn Cross [2549]	Object
5208	Mr Darryn Cross [2549]	Object
5209	Mr Darryn Cross [2549]	Object
5210	Mrs Natalie Taylor [3166]	Object
5211	Mr Darryn Cross [2549]	Object
5212	Mr Darryn Cross [2549]	Object
5213	Mr Scott Taylor [3167]	Object
5214	Mr Darryn Cross [2549]	Object
5219	Mrs Claire Curtis [3168]	Comment
5220	Mr Terence Lloyd [3171]	Object
5222	Miss Rebecca Mcgill [3173]	Object
5226	Mr Ian Bevan [3178]	Object
5228	Martyn Grey [3179]	Object
5237	Mr Barrie Chubb [3185]	Object
5277	Mr Keith Booker [3204]	Object
5278	Mr Darryn Cross [2549]	Object
5279	Mrs Anne Jenkins [3205]	Object
5281	Ms Bev Jones [3207]	Object
5285	Mrs Rebecca Blight [3208]	Object
5286	Mr Russell Blight [3209]	Object
5291	Mrs Linda Donovan [3211]	Object
5292	Mr David Phillips [3212]	Object
5295	Mrs Claire Lee [3215]	Object
5303	Mr Paul Lambert [3218]	Object
5308	Mrs Mary Vincent [2657]	Comment
5311	Professor Andrew Vincent [920]	Comment
5312	Mrs Mary Vincent [2657]	Comment
5313	Mrs Mary Vincent [2657]	Comment
5314	Professor Andrew Vincent [920]	Comment
5316	Professor Andrew Vincent [920]	Comment
5317	Mrs Mary Vincent [2657]	Object
5319	Mrs Mary Vincent [2657]	Comment
5320	Professor Andrew Vincent [920]	Comment

5323	Professor Andrew Vincent [920]	Comment
5324	Mrs Mary Vincent [2657]	Comment
5326	Professor Andrew Vincent [920]	Comment
5327	Mrs Mary Vincent [2657]	Comment
5328	Mrs Mary Vincent [2657]	Comment
5329	Professor Andrew Vincent [920]	Comment
5330	Professor Andrew Vincent [920]	Comment
5331	Mrs Mary Vincent [2657]	Comment
5336	Mr Lawrence Cattle [3235]	Object
5342	Mrs Mary Vincent [2657]	Comment
5344	Professor Andrew Vincent [920]	Comment
5346	Mrs Mary Vincent [2657]	Comment
5347	Professor Andrew Vincent [920]	Comment
5356	Mrs Luanne Helm [3239]	Object
5357	Mrs Mary Vincent [2657]	Object
5360	Professor Andrew Vincent [920]	Object
5365	Mrs Mary Vincent [2657]	Comment
5367	Mr Ian Carleton [3191]	Object
5369	Professor Andrew Vincent [920]	Comment
5382	Mrs Mary Vincent [2657]	Comment
5430	Mrs Susan Evans [712]	Object
5440	Mr richard enos [3255]	Object
5442	Mr Matt Cooper [1348]	Object
5446	Mrs Angela Grigoriou [3262]	Object
5447	Mr Darryn Cross [2549]	Object
5457	Professor Andrew Vincent [920]	Comment
5461	Professor Andrew Vincent [920]	Comment
5464	Mrs Alison Edwards [1006]	Object
5469	Mrs Mary Vincent [2657]	Comment
5474	Professor Andrew Vincent [920]	Comment
5476	Professor Andrew Vincent [920]	Comment
5477	Mrs Deborah Selley [652]	Object
5478	Mrs Mary Vincent [2657]	Comment
5479	Professor Andrew Vincent [920]	Comment
5491	Mr David Entwistle [3264]	Object
5494	Mrs Mary Vincent [2657]	Comment
5495	Mrs Mary Vincent [2657]	Comment
5496	Professor Andrew Vincent [920]	Comment
5497	Mrs Mary Vincent [2657]	Comment
5498	Mrs Helen Griffiths [3273]	Object
5500	Mrs Barbara Entwistle [2589]	Object
5501	Professor Andrew Vincent [920]	Comment
5503	Professor Andrew Vincent [920]	Comment
5514	Mrs Barbara Entwistle [2589]	Object
5525	Mrs Barbara Entwistle [2589]	Object
5528	Miss Angela Emmons [2563]	Object
5530	Mrs Barbara Entwistle [2589]	Object
5541	Mrs Barbara Entwistle [2589]	Object
5558	Mr Terrance Dodd [3292]	Object
5561	Mrs Julie Dodd [3296]	Object

5564	Stacey Robbins [3295]	Object
5620	Mr Luke Fraser [3313]	Object
5627	Mr Leon Butler [3318]	Object
5631	Mrs Karine Dubois-Jones [3322]	Object
5643	Mrs Barbara Entwistle [2589]	Object
5647	Mr David Entwistle [3264]	Object
5649	Mr David Entwistle [3264]	Object
5664	Miss Julia Thompson [2631]	Object
5671	Mrs Lisa Clissett [2565]	Object
5677	Mr Mark Clissett [3331]	Object
5681	Councillor Samantha Campbell [1002]	Object
5692	Mrs Denise Macdonald [3334]	Object
5720	Professor Andrew Vincent [920]	Comment
5728	Mrs Mary Vincent [2657]	Comment
5735	Mrs Mary Vincent [2657]	Comment
5745	Professor Andrew Vincent [920]	Comment
5746	Mrs Mary Vincent [2657]	Comment
5750	Mrs Susan Morgan [3352]	Object
5753	Mr R Davies [3353]	Object
5754	Mr Steve Ashman [3161]	Object
5755	Professor Andrew Vincent [920]	Comment
5756	Mr Phillip Davies [3354]	Object
5759	Professor Andrew Vincent [920]	Comment
5760	Mrs Mary Vincent [2657]	Object
5765	Mr David Morgan [3361]	Object
5772	Mrs Sarah Jane Davies [3362]	Object
5777	Ms Dorothy Jefferies [2587]	Object
5780	Mr Julian Tyler [3368]	Object
5790	Gareth Brown [3370]	Object
5791	Mr Huw Allaway [2434]	Object
5794	Mrs Alexis Tyler [3373]	Object
5802	Mrs Catherine Hart [879]	Comment
5803	Mrs Catherine Hart [879]	Comment
5806	Mrs Catherine Hart [879]	Comment
5810	Mrs Catherine Hart [879]	Comment
5845	Mrs Lauren Cross [2529]	Object
5849	Mrs Lauren Cross [2529]	Object
5852	Mrs Lauren Cross [2529]	Object
5857	Mrs Catherine Fraser [3401]	Object
5860	Mrs Catherine Fraser [3401]	Object
5866	Mr David Hopkin [3403]	Object
5868	Mr Daniel Campbell [3404]	Object
5872	Ms Tracy Sherratt [3406]	Object
5879	Mrs Elizabeth Rudman [3410]	Object
5883	Mrs Rebekah Vincent-Newson [2668]	Object
5884	Mrs Rebekah Vincent-Newson [2668]	Object
5885	Mrs Yvonne Davies [3411]	Object
5886	Mrs Rebekah Vincent-Newson [2668]	Object
5887	Mrs Rebekah Vincent-Newson [2668]	Object
5888	Mrs Rebekah Vincent-Newson [2668]	Object

5889	Mrs Rebekah Vincent-Newson [2668]	Object
5894	Mr Jason Vincent-Newson [3418]	Object
5896	Mrs Nicola Varney [3415]	Object
5897	Mr Jason Vincent-Newson [3418]	Object
5902	Mr Jason Vincent-Newson [3418]	Object
5905	Mr Jason Vincent-Newson [3418]	Object
5907	Mr Charles William Vickery [3422]	Object
5909	Mr Jason Vincent-Newson [3418]	Object
5913	Mr Jason Vincent-Newson [3418]	Object
5917	Mr William Hart [1009]	Object
5918	Mr Jason Vincent-Newson [3418]	Object
5920	Mr Jason Vincent-Newson [3418]	Object
5921	Mr Frank Cleland [2643]	Object
5928	Mr Jason Vincent-Newson [3418]	Object
5935	Ms Hannah Ferris [2670]	Object
5936	Mr Ross Cleland [3430]	Object
5973	Mrs Katerina Lazarou [2647]	Object
5980	Mrs Debra Cleland [2639]	Object
5984	Mr William Hart [1009]	Object
5986	Mr Bruce Norman [3447]	Object
6011	Mrs Lorna Owens [3451]	Object
6017	Mrs Jacky Williams [3343]	Object
6020	Kevin Hearne [2659]	Object
6021	Mr Martin Edwards [2596]	Object
6042	Mr Steve Thorne [697]	Object
6066	Mr Murdoch MacDonald [3463]	Object
6090	Raymond Skehens [3470]	Object
6095	Miss Julia Thompson [2631]	Object
6099	Miss Julia Thompson [2631]	Object
6109	Mrs Rebekah Vincent-Newson [2668]	Object
6125	Nadia Cooper [3478]	Object
6128	Nadia Cooper [3478]	Object
6132	Nadia Cooper [3478]	Object
6137	Nadia Cooper [3478]	Object
6152	Professor Andrew Vincent [920]	Comment
6156	Mrs Victoria Tipples [2547]	Object
6157	Professor Andrew Vincent [920]	Comment
6158	Mrs Victoria Tipples [2547]	Object
6159	Professor Andrew Vincent [920]	Object
6160	Professor Andrew Vincent [920]	Comment
6161	Professor Andrew Vincent [920]	Comment
6163	Mrs Victoria Tipples [2547]	Object
6164	Mrs Victoria Tipples [2547]	Object
6172	Mrs Sandra Toker [1575]	Object
6176	Mrs Victoria Tipples [2547]	Object
6177	Mrs Helen Ashman [3155]	Object
6179	Mrs Victoria Tipples [2547]	Object
6180	Professor Andrew Vincent [920]	Comment
6181	Professor Andrew Vincent [920]	Comment
6182	Professor Andrew Vincent [920]	Comment

6183	Professor Andrew Vincent [920]	Comment
6213	Miss Carla Vincent-Newson [3495]	Object
6219	Mrs Claire Loxton [3004]	Object
6237	Mr Jason Vincent-Newson [3418]	Object
6260	Councillor Gillian Bruce [1018]	Object
6261	Councillor William Hennessy [1031]	Object
6287	Mrs Mauren Gardner [3522]	Object
6294	Mr Jonathan Lambert [3226]	Object
6310	Mrs Leanne Drew [3534]	Object
6314	Miss Jodie Davies [3537]	Object
6319	Mrs Kay Perrett [3540]	Object
6329	Mr Bruce Perrett [3545]	Object
6341	Mrs Margaret Anderson [3546]	Object
6344	Mrs Deborah Hamer [2594]	Object
6347	Mr Nicholas Anderson [3549]	Object
6350	Mrs Judith Bird [2600]	Object
6352	Miss Valerie Lyndon [2511]	Object
6355	Mrs Sheila Crow [3556]	Object
6357	Miss Ceri Morgan [3557]	Object
6361	Mr Steve Thorne [697]	Object
6370	Mr Stuart Thompson [3559]	Object
6394	Mr Darryn Cross [2549]	Object
6398	Mr Darryn Cross [2549]	Object
6412	Mrs Jennifer Thorne [3573]	Object
6419	Sarah John [3579]	Object
6421	Mr Anthony John [3580]	Object
6425	Mr Kyle John [3582]	Object
6453	Mr Steve Thorne [697]	Object
6462	Nicholas and Elizabeth Martin [3592]	Object
6464	Mr Christopher Edwards [2619]	Object
6470	Mrs Cathryn Ferris [2583]	Object
6471	Mr Gerwyn Davies [3597]	Object
6476	Mrs Rowena Hughes [3600]	Object
6483	Mr Michael Goode [2548]	Object
6485	Mrs Emily Marchant [3498]	Object
6489	Ms Josie Vincent-Newson [3606]	Object
6490	Mr Charlie Daulton [3607]	Object
6491	Mr and Mrs Martin & Pauline Griffiths [2673]	Object
6494	Mrs Denise Harris [2630]	Object
6495	Mrs Ann M. Stone [2672]	Object
6500	Mrs Michelle Edwards [2620]	Object
6503	Vicky Jewell [3610]	Object
6505	Miss Stacey Anastasi [3611]	Object
6508	Mrs Hazel Brown [3613]	Object
6511	Mrs Jessica Bacheron [3615]	Object
6515	Mrs Mary Vincent [2657]	Object
6516	Mrs Wendy Walker [3618]	Object
6519	Professor Andrew Vincent [920]	Object
6520	Mr Eurig Jenkins [3619]	Object
6522	Mrs Veronica Govier [3621]	Object

6524	Mr Nadeem Ismail [3622]	Object
6526	Mrs Lydia Ismail [3623]	Object
6528	Mr Gareth Lloyd [3624]	Object
6529	Miss Victoria Avaient [3625]	Object
6531	Mrs Nia Goode [3626]	Object
6540	Mrs Christine Thompson [3628]	Object
6542	Mr Stuart Fraser [3630]	Object
6543	Mr Stephen Fraser [2648]	Object
6544	Mrs L Fraser [2641]	Object
6545	Mr Michael Goode [2548]	Object
6550	Daisy Williams [3632]	Object
6552	Miss Beth Norman [3635]	Object
6553	Mrs . Farhad [3636]	Object
6557	Mrs Lesley Page [3637]	Object
6558	Mrs Hannah Evans-Ford [3638]	Object
6560	Mr Russel Page [3639]	Object
6562	Miss Julia Thompson [2631]	Object
6598	Gwynfor Parr [3649]	Object
6639	Mr Michael Harris [2627]	Object
6654	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6697	Mr Dorian Morris [3237]	Object
6698	Persimmon Homes (East Wales) [1068]	Support
6708	Persimmon Homes (East Wales) [1068]	Object
6711	Mrs Denise Macdonald [3334]	Object
6763	Mrs Mary Vincent [2657]	Object
6846	Taylor Wimpey [386]	Object
6972	Dwr Cymru Welsh Water: Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7025	Mr Stephen Vaughan [3060]	Object

A total of 312 duly made representations were submitted by 186 separate representors in respect of the HG1 KS1 - Land at North West Barry. It should be noted that some representors submitted more than one representation in respect of the site. Duplicate representations have only been counted once, but if representations made different points, these have been counted separately.

In addition, two petitions were submitted. An online petition via the Council website received 272 signatures and a separate paper petition received 217 signatures. Some signatories of the online petition also signed the paper petition and many also submitted individual representations on the site.

Individual statutory consultee responses from NRW and DCWW have been addressed first.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. The key issues raised were traffic congestion, poor active travel routes and public transport, infrastructure capacity (sewerage, schools, health, community facilities),

biodiversity, loss of green wedge, impact on the historic environment, landscape impact, loss of agricultural land and affordable housing need. Concerns were also raised about the justification for the site, the use of a greenfield site, the availability of other sites and previous planning history. A full response on each issue has been provided.

It is noted that a number of background documents for each Key Site were made available as part of the consultation and where relevant the Council's response to representation makes reference to this evidence.

STATUTORY CONSULTEE RESPONSES

6654 - Natural Resources Wales (NRW)

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 and/or provision of habitats to support them. Dark areas and/or a 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).

Council Response

The Indicative Masterplan provided at Figure 13 has been informed by existing ecological survey work. However, it is noted that at planning application stage there will be a need for updated surveys and additional surveys, which may result in further amendments to the layout. Appendix 2 of the RLDP on Infrastructure Requirements highlights the need for up-to-date ecological surveys.

With regards to protected sites, as set out in the wider response to representations from NRW, it is agreed that the policy should reference the proximity to the SSSI and the need for appropriate alternative open space. However, it should be noted that both Walters Farm SSSI and the parcels of land comprising Barry Woodlands SSSI are privately owned sites with no public rights of way. Any unauthorised access on the SSSI land would be the responsibility of NRW working with the relevant owners under management agreement if necessary to control unauthorised access. Notwithstanding this, a proposed addition to the key site policy is proposed.

Support for the existing policy text on SANG is welcomed.

7035 - Natural Resources Wales (NRW)

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.

Council response

The key points raised as part of the October 2023 consultation response from NRW were:

- A full Preliminary Ecological Appraisal (PEA) should be undertaken.
- Given the proximity to protected sites, there is potential to improve connectivity between Coedydd y Barri / Barry Woodlands SSSI and Cliff Wood – Golden Stairs SSSI.
- We highly recommend that Green Infrastructure be considered within the initial design phases of any proposed development, which should aim to work with the remnant hedges across the site.
- It is noted that a tributary of the Nant Talwg flows across the site. The Nant Talwg flows into the Cliff Woods – Golden Stairs SSSI. It is therefore a potential pathway for impacts on the SSSI.
- A 10m buffer from the watercourse should be maintained to mitigate for any potential pollution and protection for the river corridor. We advise that a CEMP would be required for any proposed development. This will mitigate potential impacts on the SSSI from this pathway.
- NRW are aware of European Protected Species (EPS) records for the proposed site – dormouse. Dormouse are likely to be present within hedgerows and scrub on site and within woodlands just off site. Otters are also recorded using watercourses within the South of the site boundary. We therefore advise that any application that comes forward for this site should be supported by up-to-date ecological survey information, to include relevant protected species surveys as appropriate and appropriate mitigation/compensation.
- The full survey requirements should be determined in liaison with the Local Authority Ecologist. Where species are present, development should aim to retain and enhance supporting habitats and include appropriately sized buffers to watercourses and retained habitat features, including hedgerows. We would look to the applicant to deliver wider boundaries. Please note: Where EPS are present, sufficient information should be submitted to ensure that the three tests for licensing can be met.

The comments from October 2023 related to a larger candidate site (referenced 449) rather than the larger site that was revised through the RLDP process. Notwithstanding this, NRW's comments have been considered in respect of revisions to the layout.

NRW were consulted on the larger site in April 2025, where it was advised that the October 2023 advice remains. It was highlighted that the increase in dwellings may result in an increase in unauthorised usage of the SSSIs by the general public. NRW reiterated the importance of the provision of Suitable Accessible Natural Greenspaces (SANGs), which will be of even greater importance in providing opportunities for residents/the general public to access greenspace, in turn reducing pressure on nearby protected sites.

In their latest response on the Deposit Plan, NRW welcomes the inclusion of an area of SANG as part of the development.

With regards to survey requirements and protected species, an additional bullet point on planning applications is proposed to be included in the introductory section of Appendix 2 which highlights the need for up to date surveys. This is set out in the response to representation 6653 by NRW.

These requirements are also referenced in the PEA for the site. The PEA confirms that the masterplan will need to be informed by further species specific surveys at application stage, this will identify appropriate avoidance, mitigation and enhancement measures, including the retention of boundary habitats, creation of mitigation zones, provision of bat and bird boxes, and the use of sensitive, low spill lighting to maintain dark corridors along woodland edges and watercourses as suggested by NRW. Similarly, the PEA acknowledges the potential for indirect recreational pressure on nearby designated sites and recommends design measures such as green infrastructure provision, habitat buffering, fencing and managed access to reduce disturbance. Subject to these safeguards and further assessment at planning application stage, the impacts are considered capable of appropriate mitigation.

The Green Infrastructure Vision Document has been informed by the Preliminary Ecological Appraisal and arboricultural surveys. The vision document confirms that detailed proposals, including a Green Infrastructure Statement and species specific mitigation, will be prepared at planning application stage in accordance with the Planning Policy Wales step wise approach. As such, the absence of detailed protected species prescriptions within the Vision Document reflects the appropriate level of detail for allocation and concept stage masterplanning.

With regards to landscape fragmentation and potential severance by road infrastructure, the Vision Document places strong emphasis on retaining and reinforcing existing hedgerows, woodland edges, watercourses and green corridors to maintain ecological connectivity across and beyond the site. In relation to the green spine, boundary planting, woodland buffer and SuDS corridors proposed in the initial masterplan, these are intended to function as continuous movement routes for wildlife and to minimise fragmentation. The Council acknowledges that the initial internal road network identified will require further refinement as part of future detailed design. The Council will continue to engage with NRW in development of the masterplanning of the site to ensure appropriate biodiversity mitigation and enhancement measures are integrated within the site.

Proposed change

Include the following bullet point in the key site policy:

- The site is in close proximity to Walters Farm and Barry Woodlands SSSIs and the provision and/or enhancement of appropriate alternative open space on site and/or in the area to reduce recreational pressure on the SSSIs will be required.

This should also be referenced in Appendix 2 of the RLDP and BP44 Infrastructure Plan.

6972 - Dwr Cymru Welsh Water

Water Supply - A hydraulic modelling assessment (HMA) will be required. Wastewater - A hydraulic modelling assessment (HMA) will be required. Wastewater Treatment Works - Cog Moors WwTW has capacity to accept foul flows from the proposed development.

Council response

The comments are noted. These constraints are set out in Appendix 2 of the RLDP.

INDIVIDUAL RESPONSE

6698 - Persimmon Homes (Asbri Planning) - Support

We write specifically with regard to the Key Site at 'North West Barry' (Policy SP4: KS1). As the Authority are aware, a significant amount of supporting information has been prepared in relation to the Key Site over the course of the preparation of the Replacement LDP to date – this detailed evidence has clearly demonstrated that the inclusion of 'North West Barry' as a Key Site with the Replacement Plan fully accords with the Replacement LDP strategy. Furthermore, the detailed submissions have evidenced that the site is entirely deliverable and viable.

Council Response

Support is welcomed.

6708 - Persimmon Homes (Asbri Planning) – Object

As stated, although the representations provide overarching support for the Deposit Plan and the inclusion of Land at North West Barry as an allocation, a number of detailed matters are objected to in relation to specific elements of the proposed KS1 policy wording.

It is acknowledged that the Key Site will need to be delivered in accordance with placemaking principles (as set out in Policy SP4 Placemaking and Policy PGD1 Creating Well Designed Places), and masterplanning work to date has demonstrated that the site is fully capable for compliance with both Policy SP4 and PGD1.

Comments are provided on the additional requirements which the site is anticipated to comply with as set out at Policy HG1 KS1.

The policy as currently worded is considered to be overly prescriptive with regards to the positioning of affordable units on the site. It is the case the Registered Social Landlord who

is responsible for the delivery and ongoing operation/management of the affordable units is best-placed to advise upon the positioning of the affordable units within the site layout. As such, it is requested that the prescriptive nature of the above bullet point is amended to allow for the RSL to advise on best practice.

With regards to the first two bullet points set out under the 'Sustainable Transport and Highways' section of the Policy HG1 KS1, to confirm, as part of the development of the Key Site, it is proposed (as detailed within the submitted Transport Assessment) to construct a new junction from Port Road to the west of the Weycock Cross roundabout at the location of the existing field gated access in the form of a signal-controlled junction, which would allow for the safe and timely exit of traffic from the development onto the local highway network. Such an access would also provide enhanced Active Travel infrastructure in conjunction with the proposed Active Travel route between the Weycock Cross junction and Cardiff Airport. Traffic signals at the proposed site access would provide for dedicated demand dependent green time for pedestrians and cyclists along this section of the A4226 Port Road.

Significant work has been undertaken to date in demonstrating that the above is deliverable. However, it is requested that further clarification is included within the policy text to confirm that the Key Site is not responsible for the delivery of any further/additional sections of the Weycock Cross to Cardiff Airport Active Travel route, over and above the section of the route which adjoins the Key Site.

As set out within the Transport Assessment (May 2025) prepared in support of the Key Site, the traffic movements associated with the North West Barry allocation could be accommodated on the highway network with a marginal and inconsequential impact on the conditions already experienced on the local highway network. An appraisal of the impact of committed development (as agreed with the Highways Authority) has been undertaken as part of the Transport Assessment, which identifies that committed development within the vicinity of the Weycock Cross junction would have a greater impact upon the local highway network than the North West Barry Key Site. The North West Barry development is smaller in comparison to the other committed development assessed, and would have a marginal and inconsequential impact upon the operation of the Weycock Cross junction. It is therefore considered that the policy wording should be amended to reflect the 'proportionate' nature of contributions required.

It will be important to ensure that any off-site measures are directly related to the proposed development, and are necessary to ensure the acceptability of the proposed development. The requirement for a contribution towards off-site measures 'in the area' is not specific enough, and it is requested that the wording is amended as per the suggested text

It is considered that the inclusion of a specified figure for the area of open space to be provided within the southern section of the site is unnecessary within the policy text. The Indicative Plan for the Key Site included at Figure 13 of the Deposit Plan illustrates the indicative extent of 'Significant Open Space' to be provided adjoining Porthkerry Country Park, which will be subject to further detailed masterplanning work as the Planning Application is prepared in due course. A figure for the exact area of open space to be provided within this section of the site cannot therefore be robustly specified until the

further stages of masterplanning work are completed. As such, it is requested that the figure is removed from the policy text, with the identification of 'Significant Open Space' on Indicative Plan being considered satisfactory. Furthermore, it is not considered appropriate that the policy wording should refer specifically to the financial contribution towards the management of this land, in addition to its transfer, as such contributions will be subject to detailed viability appraisal work at the Planning Application stage.

Suggested Change

Amend following bullet points as worded

1) The provision of a minimum of 113 affordable housing units (30%) with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data. ~~In order to deliver a greater social mix, the affordable units should be dispersed across the site in clusters of no more than 10 units~~ **The positioning of the affordable units will be informed by the experience and best-practice of the Registered Social Landlord responsible for the delivery and ongoing management of the units**, with their delivery being phased across the development trajectory.
2) Provision of land across the site frontage to allow for the widening of the A4226 Port Road West and the delivery of an Active Travel route across the frontage of the site as part of the Weycock Cross to Cardiff Airport Active Travel route, as identified in Policy TR1 **(relating specifically to the delivery of the section of the Active Travel route adjoining the northern boundary of the Key Site only).**
3) Creation of a new signalised junction on to the A4226 Port Road West, which will need to accommodate controlled pedestrian/cycle crossing facilities.
4) A **proportionate** contribution towards off-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highways network where necessary **(in the context of the impact of wider committed developments on the strategic highway network)**.
5) A contribution towards off-site sustainable transport measures **(as necessary and related to the Key Site)**.
6) The provision of a key area of open space ~~(minimum 2.3 ha)~~ to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to the adjoining SINC at Mill Wood and offer opportunities for significant biodiversity enhancements. The ownership of this area should be transferred to the Vale of Glamorgan Council, together with an appropriate financial contribution, for management as part of Porthkerry Country Park.

Council Response

The policy requirement for the pepper potting of affordable units through the development of no more than 10 units (point 1) is consistent with the Council's longstanding policy as set out in the Council's Affordable Housing Supplementary Planning Guidance. This is to ensure that social rented and low cost home ownership units blend in with the neighbouring open market housing and is integrated properly across a development, which is especially important on larger housing developments. This should not be amended.

In respect of point 2, it is not considered that this additional statement adds anything to the policy as the policy already references the Active Travel route.

It is a key planning principle that any Section 106 contributions must meet statutory tests, specifically that they should be proportionate (point 4) and necessary and related to a site (point 5). As this is a statutory requirement, it is not considered that it is necessary to add this into the wording of the policy.

The delivery of a key open space is an important part of the overall masterplanning and SANG strategy, as well as serving as a buffer for the woodland beyond. It is therefore not considered appropriate to potentially reduce what has been identified by removing the minimum site area.

COMPOSITE RESPONSE

COMMENTS AND OBJECTIONS

Issue - Traffic Congestion

- Concerns that an additional 376 homes (potentially 700–1,000 cars) would cause gridlock, increased journey times and accident risk and delay emergency services.
- Access to Cardiff Airport could be severely impacted.
- Cumulative impact with housing proposed at Rhoose and St Athan.
- Insufficient traffic data contained within the transport assessment.
- Increased traffic will have an impact on Climate Change, contrary to LDP Objective on Mitigating and Adapting Climate Change.

Council Response

The proposed RLDP housing allocation at HG1 KS1 Land at North West Barry, alongside sites located at Rhoose and St Athan, has the potential to increase traffic flows within the Vale of Glamorgan. Accordingly, in preparing the Deposit Plan, the Council has sought to identify the potential transport impacts of the proposed allocations and the mitigation measures that would be required from site promoters to address those impacts.

In considering the traffic implications associated with the Key Site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of development proposals on the strategic transport network and to identify mitigation measures where necessary. The STA is also supplemented by evidence from site-specific Transport Assessments. The full assessment is set out in background evidence documents BP14 Strategic Transport Assessment - Stage 1 and BP14A Strategic Transport Assessment - Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a comprehensive review of the baseline transport conditions in the Vale of Glamorgan and examines the existing transport infrastructure and its current operational state, including the strategic highway network, using various data sources.

The Stage 2 STA comprises a series of technical notes on Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation, and Cost Estimation and Funding Mechanisms.

The STA utilises the South East Wales Transport Model (SEWTM), which is maintained and updated by Transport for Wales. The model covers the Cardiff Capital Region and provides a recognised strategic modelling basis for assessing the cumulative impacts of strategic housing allocations on the strategic highway network. The assessment includes two forecast scenarios:

- 2036 Base Scenario - representing 2022 SEWTM base flows factored to 2036 using TEMPro-derived growth rates, excluding traffic from the RLDP strategic housing sites.
- 2036 RLDP Scenario - representing the 2036 Base flows plus traffic associated with identified strategic housing sites.

As the study utilises a recognised and independent regional transport model, applies forecast background growth to 2036 in line with industry standard procedures, and separately tests the cumulative impact of the strategic housing allocations, the traffic data used in the STA is comprehensive, robust and sound for plan-making.

Technical Note 5 of the STA provides a detailed assessment of the forecasted cumulative impact of the proposed RLDP housing allocations on 17 highway network junctions where the SEWTM outputs, together with professional judgement and local knowledge, indicated that the cumulative impact of RLDP sites could have a material effect on highway operation.

The strategic data showed that Junction 16, Weycock Road/Port Road West/Pontypridd Road roundabout, was forecast to experience an increase in traffic of 7.2% in the AM peak and 12.2% in the PM peak and was therefore carried forward for more detailed modelling.

Following detailed modelling, Technical Note 6 indicates that, in the 2036 Base scenario without RLDP strategic housing traffic, Weycock Cross roundabout would be nearing practical capacity, with maximum AM and PM RFC values of 88%. When the cumulative impact of the RLDP strategic housing sites is included, this increases to 102% in the AM peak, which is over capacity, and 97% in the PM peak, which is close to capacity. This represents a worsening of performance compared with the 2036 Base scenario. The STA therefore identifies a material impact at this junction and mitigation is considered necessary.

The reference to 700 to 1,000 cars does not represent the number of vehicles that would use the junction at any one time. Car ownership is different from peak-hour trip generation. Household travel patterns vary, not all residents travel during the highway peak hours, and not all journeys are made by private car. The site-specific Transport Assessment for HG1 KS1 uses forecast multi-modal trip generation rates derived from the Trip Rate Information Computer System (TRICS), which is a recognised UK database used for transport assessments. This indicates that the development would generate up to 162 two-way trips in the AM peak and up to 170 two-way trips in the PM peak. These assumptions are considered appropriate for assessing the likely peak hour traffic effects of the allocation.

The traffic evidence is not limited to the site promoter's Transport Assessment. The survey data used for the North West Barry assessment and the associated Weycock Cross modelling are consistent with traffic survey evidence submitted in support of other candidate sites in the area. In addition, Weycock Cross was separately assessed by the Council's transport consultants as part of the STA. The STA uses the Transport for Wales South East Wales Transport Model and applies forecast background growth to 2036 in line with industry standard procedures. This ensures that housing and employment growth throughout the Vale of Glamorgan and the wider South East Wales region is robustly captured within the strategic assessment.

To address the impact of additional traffic flows, Technical Note 7 of the STA identifies potential highway mitigation measures for Weycock Cross. Two mitigation options were considered: Option A, maximum widening while retaining the roundabout, and Option B, partial signalisation. Option A comprises targeted widening of the roundabout entries, with localised lane-marking modifications to improve entry width, provide extended approach lanes and increase circulatory capacity. Option B would introduce MOVA-controlled signals on the A4226 eastern and western arms in addition to the widening works.

The Option A assessment in Technical Note 7 shows that widening the junction and improving road markings could allow the junction to operate within theoretical capacity during the AM peak. The modelling demonstrates that the highest ratio of flow to capacity would decrease from 88% in the 2036 Base scenario to 78% in the 2036 RLDP scenario with the mitigated junction layout, with corresponding reductions in average delay and queue lengths across all approaches. Overall average delay at the junction is forecast to reduce, indicating that the scheme has the potential to provide measurable capacity and delay benefits if progressed to detailed design and implementation.

The PM peak results indicate that the Option A widening concept would maintain stable operation across most approaches at Weycock Cross, although the A4226 east arm would continue to operate close to capacity. This reflects localised queuing during the busiest periods rather than overall junction failure. All other approaches remain comfortably within capacity. Overall junction delay increases only marginally, indicating that the scheme could accommodate RLDP traffic growth without materially degrading performance.

It should be noted that the STA mitigation modelling assesses the strategic operation of Weycock Cross roundabout and the cumulative impact of the RLDP strategic housing allocations. It does not provide the detailed modelling of the proposed HG1 KS1 site access junction or its operational interaction with Weycock Cross. That matter has been considered separately through the site promoter's Transport Assessment and subsequent technical work. The promoter's modelling indicates that the proposed signalised access and Weycock Cross roundabout can operate as linked junctions, with the site access regulating the release of development traffic onto Port Road West rather than allowing all site traffic to enter the main traffic stream under priority control. The proposed signal equipment would be under the control of the Council as Highway Authority and is expected to have MOVA control, allowing signal timings to respond dynamically to traffic conditions. This would reduce the

likelihood of adverse interaction between the site access and Weycock Cross roundabout, for example by providing extended green time on the westbound approach when required.

The indicative cost of the scheme is detailed in the BP14A Strategic Transport Assessment – Technical Note 8. The cost estimates assume that the developer of key site HG1 KS1 Land at North West Barry will deliver those improvements directly related to their development. Improvements to the junction itself are anticipated to be funded by Section 106 contributions, which the Council is already in receipt of for strategic highway network improvements in the Barry area, together with additional contributions from RLDP allocated sites.

The mechanisms for securing these monies will be through Section 106 planning obligations at the planning application stage. The Deposit RLDP Key Site Policies KS1 to KS5 specify a requirement for off-site contributions towards improvements to the strategic highway network. Policy HG1 KS1 Land at North West Barry states that the development will be required to provide a contribution towards off-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highway network where necessary. Policy TR1 Transport Proposals identifies strategic highway improvements, including improvements to Weycock Cross roundabout. The Deposit RLDP Infrastructure Plan also sets out the infrastructure requirements for each proposed housing allocation in the Plan.

The costs associated with each key housing allocation have been accounted for in the site-specific viability assessment undertaken and are considered both appropriate and deliverable as set out in Background Paper 42A Independent Financial Viability Assessments of Key Sites.

At planning application stage, an updated Transport Assessment and detailed designs will be required for both the site access and the off-site highway improvements. The final interaction between the proposed signalised access, Weycock Cross roundabout and the wider mitigation works will be considered further through updated Transport Assessment work, detailed LinSig modelling, detailed design and Road Safety Audit as required.

However, the level of detail included in the RLDP and supporting documents is considered sufficient to justify that, in principle, the allocation is deliverable and that its transport impacts can be appropriately mitigated.

Cardiff Airport and the emergency services were consulted on the Deposit RLDP and did not raise objections to the proposals. Access to Cardiff Airport will also continue to be considered through the planning application process, including the detailed design of the site access, Weycock Cross mitigation and any associated traffic management requirements.

In respect of climate change, the Deposit RLDP is supported by a strategy that promotes sustainable growth, active travel, public transport and a reduction in car dependency. This is achieved by locating development in the most accessible locations. While it is acknowledged that the development will inevitably result in car borne trips, it is considered to be fundamentally sustainable, located at the edge of the largest settlement in the Vale. These matters are considered in more detail in the section below, which considers those

objections in the context of the site's location, and sustainability/transport options. The Council has identified necessary mitigation measures in terms of highway improvements and strategic highway contributions, and this requirement is embedded within the individual Key Site policies of the Plan. In addition, the RLDP contains a number of policies relating to measures that will contribute towards mitigation and adaptation to climate change that are of direct relevance to this site, namely policies PGD1, SP10, SP13, SP16, policies CC1-CC4, SP19 and SP20. These policies are applicable to all developments, requiring mitigation measures such as biodiversity enhancement, management of flood risk and the construction of net zero buildings.

Issue - Poor Active Travel Routes and Public Transport

- The proposed site lacks safe, continuous footpaths, dedicated cycle lanes and crossings at key junctions.
- Existing roads are narrow, busy, and unsafe for pedestrians and cyclists.
- Bus services are infrequent, unreliable and poorly connected to key destinations like schools, hospitals, and train stations.
- Train stations are too far to walk for most residents and not easily accessible by bike or bus.
- Poor access to public transport.
- The development is seen as car-centric, with no nearby shops, schools, or services within walking distance.
- Carbon emissions and parking pressure in surrounding areas.
- Active Travel (Wales) Act 2013 – requires new developments to support walking and cycling.
- Planning Policy Wales (PPW) – prioritises sustainable transport and reducing car use.

Council Response

The Deposit Plan sets out the requirements for the provision of active travel routes for each of the housing allocations, reflecting the plan's objective of "Promoting Active and Sustainable Travel Choices". In respect of Land at North West Barry, the policy text for KS1 specifically requires the provision of land to accommodate the proposed active travel route from Weycock Cross to Cardiff Airport, alongside off-site sustainable transport improvements, including connection to the public right of way to Porthkerry Country Park via Cwm Ciddy Lane. The Deposit RLDP Infrastructure Plan (BP44) also specifies that contributions shall be sought for the enhancement of active travel and public transport improvements.

Regarding access to Barry train station, to inform the RLDP strategy, the Council has utilised Transport for Wales isochrome maps for both walking and cycling to illustrate accessibility to rail services. The maps provide approximate travel time distances of 5-, 10-, 15- and 20-minutes for both walking and cycling (See Background Paper 18 Appendix 3).

Barry is the most comprehensively served settlement for rail travel within the Vale, with four stations located at Cadoxton, Barry Docks, Barry and Barry Island. Services offer four trains per hour to Cardiff, and currently an hourly service to Bridgend via Rhoose and Llantwit Major. The isochrone map for Barry indicates that the site is approximately a 25-30 minute walk or a 10–15-minute cycle to the nearest station - this being Barry Station.

It is recognised that not all residents will be willing or able to walk or cycle to the station or to other services and facilities, and the RLDP does not assume that future residents of the site will only travel by sustainable modes. However, the site is located in a part of the Vale of Glamorgan where sustainable transport modes represent genuine and available alternatives for residents. Even where car borne journeys are unavoidable, the relative proximity of the site to a range of services and facilities in Barry means that journey distances would be reduced. It should be noted that the rail stations at both Barry and Barry Dock provide park and ride facilities. It is accepted that sequentially this is less preferable to an inner town location in even closer proximity to a station, however, in the absence of such sites being available, it is nevertheless considered that the site is sufficiently accessible to comply with the thrust of policies on sustainability and climate change.

Bus stops near the site entrance provide access to Service 304, which connects to Barry town centre, Barry station, Dinas Powys, and Cardiff, as well as Rhoose and Llantwit Major in the opposite direction. Additionally, Services B1 and B2, which serve Barry, can be accessed in close proximity from Pontypridd Road. In addition, the Council is currently considering tenders for 3 new rural Vale services. Service V3 Cowbridge to Barry is proposed to serve Pontypridd Road.

Improvements to active travel and enhancements to accessibility to public transport and active travel are key policy issues. An assessment of the most appropriate and user friendly active travel routes would be further considered in more detail at the planning application stage. Further detailed site master planning would enable the identification of active travel improvements within and surrounding the site. This may include (but is not limited to) upgrades to existing and new pedestrian/active travel measures for walking and cycling. It is also noted that the site would benefit from the Council's proposed active travel improvements between Weycock Cross roundabout and the Dragon's tail roundabout in Rhoose, which are being progressed currently.

Additional improvements to sustainable transport would be secured in the line with the Council's Planning Obligations standards. Appendix 2 Infrastructure Delivery Plan contains an initial assessment by the Council of the necessary infrastructure contributions that would be required for Land at North West Barry, including contributions for sustainable transport measures. The aim of these improvements would be to ensure that active travel provides a safe and viable alternative option for journeys and would allow for improved accessibility to and from the site.

Regarding crossings at key junctions, it is proposed that the signalised access linking the site to Port Road West would include a pedestrian/cycle crossing, and a new pedestrian/cycle crossing is identified on Pontypridd Road.

Port Road West, Five Mile Lane and Pontypridd Road are all considered to be of sufficient width and standard to accommodate traffic flows without undue risk to cyclists and pedestrians.

It is considered that the site benefits from good to a range of services and facilities. A neighbourhood food store is located near Weycock Cross roundabout, and a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium, and Church in Wales), and two secondary schools (English and Welsh Medium) are all within reasonable walking distance. While it is acknowledged that services located in the town centre and other parts of Barry are further from the site, they are nevertheless easily accessible, where journeys (even if necessitated by car) would be short.

It is considered that the location of the site and proposed active travel improvements accords with the intentions of Planning Policy Wales and the Active Travel (Wales). The site is considered to be in a fundamentally sustainable location, where residents can choose to travel by means other than the car.

Issue – Sewerage capacity

- Sewerage infrastructure is reportedly at capacity - Nant Talwg pumping station is under strain.
- Risk of sewage overflows into local watercourses and beaches.
- Additional housing could worsen overflow events, posing public health and environmental risks.

Council Response

In preparing the Deposit Plan, and in the assessment of the site Land West of Barry, the Council has consulted Dwr Cymru Welsh Water (DCWW) to identify existing water and mains sewage capacity issues associated with each proposed development, including the capacity requirements for the site.

DCWW has advised that the developers may be required to undertake an assessment of Barry Nant Talwg Sewage Pumping Station (SPS) to establish whether the flows can be accommodated or whether an upgrade to the SPS will be required to allow development to proceed. This requirement is reiterated within the Infrastructure Plan that accompanies the Deposit Plan. This assessment will be required in support of any future planning application for the site and shall be a material consideration in the determination of an application.

In terms of wastewater treatment, DCWW have also advised that sufficient capacity exists at Cog Moors wastewater treatment works to support the number of houses proposed.

Issue – Flood Risk

- The site will increase flood risk by reducing natural surface water absorption and reducing infiltration.
- Part of the site is in a flood zone.

- Several residents have experienced flooding in their gardens.
- NRW detailed flood data not available so no numerical assessment of depth, velocity or hazard rating.
- Drainage report highlights discrepancy between topographical survey and flood model outputs. – 2.5m difference but tolerance normally 0.1 to 0.25m.
- Infiltration rates expected to be low due to soil conditions (clay).
- No evidence that open channel or culvert has capacity.
- Porthkerry Park and Millwood already experience significant flooding.
- The submitted drainage strategy is incomplete and does not address the presence of clay-heavy soil and poor permeability which has not been suitably tested. Reliance on soil infiltration will increase flood risk and surface water runoff, flooding of nearby homes, roads, and gardens.
- Sustainable Drainage Systems (SuDS) may not be suitable for the site's soil type and have not been properly tested or modelled and could fail during heavy rainfall events.
- No clear plan for long-term maintenance of drainage system.

The site is not located within a flood risk zone for river or sea flooding. However, the central part of the site lies within a surface water and small watercourses flood zone, as identified in the Flood Map for Planning. This is due to the presence of a small stream crossing the site. This area has been identified as a wetland park, where no built development is proposed, and this is recognised in the policy text.

The submitted Preliminary Drainage Strategy explicitly identifies that the site is underlain by slowly permeable, seasonally wet loamy and clayey soils with impeded drainage, based on SoilScapes mapping. As a result, the strategy does not rely on infiltration as a primary method of surface water disposal and concludes that infiltration SuDS are unlikely to be viable across most of the site. In accordance with the drainage hierarchy and SAB guidance, infiltration is identified as "to be confirmed" and subject to further testing and geotechnical investigation at application stage, which is appropriate for a site at allocation stage.

Reflecting these soil constraints, the strategy proposes that 100% of surface water runoff from the developable area would be attenuated and discharged to the on-site watercourse at greenfield rates. While clay soils necessitate larger attenuation volumes, and the strategy proposes a manageable design response which indicates that the site is suitable for development. The soil conditions are therefore a recognised constraint but not a fundamental barrier to allocation, with further detailed investigation appropriately deferred to the planning application stage.

The Deposit Plan concept plan for the site identifies indicative areas of Sustainable Urban Drainage System (SuDs) infrastructure to manage potential surface run off. This has been informed by a preliminary drainage strategy report which has been undertaken for the site and made available as part of the deposit plan consultation. This report identifies potential sources of flood risk and recommends that a further detailed surface water survey be

undertaken to identify measures for managing surface water within the site. In this regard, as part of any future planning application submitted on this site, the Council's Drainage Team and Natural Resources Wales will have to be fully satisfied that the drainage and flooding measures proposed are sufficient to deal with the associated risk prior to any development taking place.

Furthermore, since 2019 provision of SuDs have been required in Wales to assist in achieving sustainable development in respect of flooding and drainage on new developments. This process is administered by the Council through the SuDS Approval Body (SAB) and they must approve a SuDS scheme before development can commence. The use of SuDS mimics natural drainage, managing surface runoff at or close to the surface and as close to its source as practicable, controlling the flow (volume and rate of runoff) and providing a range of additional benefits. The outcome of this is that issues associated with flooding and drainage should be dealt with on site and prevent any detrimental offsite impacts.

Accordingly, the Council is of the opinion that appropriate measures are in place to ensure that development of the site shall only proceed once detailed surface water and drainage mitigation measures have been identified and approved by the Council.

Issue – Education Capacity

- Local schools are at or over capacity, particularly Whitmore High School – turning away local children.
- Primary schools in the area are also under pressure and would exacerbate overcrowding.
- Require new school places without clear plans or funding.
- Force children to travel further, increasing traffic and reducing community cohesion.
- No guarantee that the contributions will be viable.
- Lack of infrastructure concerns - contrary to the Placemaking Charter the Council has signed up to.

Council Response

The Council acknowledges that new development may require the provision of additional supporting infrastructure to mitigate the impact that new development may have. In this regard, in preparing the Deposit Plan the Council has undertaken an assessment of the likely impact of the proposal. The Infrastructure Plan accompanying the Deposit RLDP sets out the infrastructure requirements for each site, and these requirements are reflected within the Deposit Plan Policies. The cost to the developer for this additional infrastructure has been accounted for within site-specific viability testing to ensure that the requirements can be supported by the development, as set out in Background Paper 42A Independent Financial Viability Assessments of Key Sites.

In respect of educational provision, the Council has undertaken an assessment of educational need generated by the site in respect of forecast future school places for

nursery, primary and secondary education (BP43 Education). This indicates that, based on pupil forecasts, the site is projected to generate the need for 80 secondary school places and 90 primary school places. At secondary level, there is sufficient capacity at Welsh Medium and Denominational schools, but additional capacity may be required at the English Medium catchment school, Whitmore High. If this forecast position remains the same at planning application stage, the Council will look to secure a financial contribution towards increased secondary school capacity.

Background Paper BP43 concludes that there are sufficient primary school places to accommodate forecast pupil numbers, but a forecast shortfall in nursery places. This position will continue to be reviewed and where necessary, a financial contribution for increased nursery capacity will be required.

In considering the necessary infrastructure requirements, all key sites have been the subject of detailed development viability appraisals. These have included associated infrastructure costs that have been tested to ensure that the development can financially support the contributions towards the identified infrastructure. These viability appraisals will be reviewed at the planning application stage to account for any changes in infrastructure requirements.

With regard to Placemaking Charter, the Council has undertaken non-statutory site-specific consultations on placemaking on key sites as part of the plan preparation. This has been arranged by the Council, in conjunction with site promoters, to enable residents to comment on site proposals and raise issues that have informed the initial indicative site plans within the Deposit RLDP and also informed the individual site-specific policies of the plan. Details of these are contained within Background Paper 1A (Pre Deposit Engagement Vol 2). Further community engagement is a requirement under national planning at pre-application stage, and the Council will consider how this engagement has been taken into consideration through site development proposals.

Issue - Healthcare and Emergency Service Capacity

- GP surgeries and dental practices are already oversubscribed.
- Experiencing long waiting times for appointments.
- No indication of new healthcare provision
- Increased population will have a negative impact on emergency services

Council Response

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites are identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes Barry, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this is contingent on securing necessary investment.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented from April 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

Issue – Community Infrastructure

- There are insufficient community facilities to serve the development.

Council Response

The Council shall seek appropriate contributions from site developers towards enhancing recreational and community facilities. S106 contributions can be sought from developers towards the costs of providing community and social infrastructure, arising from the development.

Issue – Biodiversity

- What ecological surveys have been undertaken and what measures are proposed to safeguard wildlife?
- The area supports a rich ecosystem, including protected species such as bats, dormice, otters, birds (e.g. Eurasian Jay, Bullfinch, skylarks, sparrowhawks), and foxes.
- The site cannot deliver PPW's requirement net benefit for biodiversity.

- The site borders ancient woodland and contains hedgerows and lowland deciduous woodland—features protected under Section 7 of the Environment (Wales) Act 2016.
- Development would cause habitat fragmentation, increased disturbance from noise, light, and human activity, and lack of binding biodiversity net gain plans.
- What measures will be put in place to deter off-road bikes accessing neighbouring woodlands.

Council Response

A preliminary ecological assessment (PEA) has been undertaken by the site promoters and has been published as part of the site-specific supporting evidence. The PEA has considered the ecology present within and adjoining the site and identified mitigation measures. The main findings of the PEA indicate that the site includes arable fields, poor semi-improved grassland, hedgerows, a stream, dense scrub, and broadleaved trees. Priority habitats identified include hedgerows and the stream.

The PEA recommends that boundary hedgerows, stream, and dense scrub are of greater ecological importance and these should be retained as part of the local green infrastructure network. Where the presence of protected species was noted, the PEA recommends provision of boundary buffers between development and natural areas of foraging, ensuring any site clearance is undertaken outside of nesting /breeding season and that specific mitigation measures should be implemented including setting aside existing land within the site and designated as an "ecological mitigation zone" or alternative off-site provision be made.

The Council has also consulted with Natural Resources Wales (NRW) on this site. In their response, NRW have highlighted the presence of protected species within and adjoining the site, and whilst not raising any objections to the proposed allocation, NRW have highlighted the need to ensure that these biodiversity interests are maintained and enhanced. This includes restricting unauthorised access for recreational uses at Walters Farm Site of Special Scientific Interest (SSSI) and Barry Woodlands SSSI, and that the site layout should incorporate sufficient open spaces within the development to reduce this risk and benefit the wider biodiversity interests and species present in the area.

In this respect, the indicative concept masterplan for the site included in the Deposit Plan indicates that a large area of the site will be retained as open space, which will provide appropriate land for mitigation measures to be implemented. Nevertheless, the Council shall require further detailed site designs to be provided at the planning application stage that evidence how the site layout has responded to ecological constraints within the site identified through further detailed ecological surveys undertaken.

The development will also be required to comply with national and local policy for achieving Net Biodiversity Benefit and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. In this respect, as a statutory consultee NRW will have oversight of any mitigation measures proposed at the planning application stage to ensure delivery of these objectives.

Additionally, any future development at the site would have to provide a detailed Green Infrastructure Strategy for the site. This shall incorporate green infrastructure measures that will also contribute towards delivering a biodiversity net benefit. More detail on this will be determined at planning application stage. Nevertheless, at this stage, principles for protection and net-benefit opportunities have been identified as part of the initial site master planning.

The appropriate management of the open space and its relationship with adjoining woodlands is a detailed matter that would need to be considered at planning application stage including any controls necessary for off-road bikes.

Issue - Loss of Green Wedge

- The site lies within a designated Green Wedge, intended to prevent urban sprawl between Barry and Rhoose, preserve the rural character and openness of the landscape.
- The green wedge background paper put in place by the Vale of Glamorgan Council in 2011 emphasises the importance of this green wedge and how it should be afforded protection from future development.
- This development breaches the Vale's own Local Development Plan, Policy MG18 (Green Wedge): a designation explicitly created to prevent the urban sprawl that this very scheme would accelerate.
- Development on this site would extend Rhoose / Barry beyond its natural boundary and constitute urban sprawl
- Planning Policy Wales, Edition 12 (2024), paragraphs 3.64–3.72 reiterate that Green Wedges must include only land "necessary to keep open in the longer term."
- Encroachment has not nullified the land's value but has made its protection even more vital.
- The justification for the removal of the green wedge misinterprets Planning Policy Wales (PPW) by reducing Green Wedge value to *distance* rather than function, character, and perception.
- The justification for redefining the Green Wedge boundary is weak and would set a damaging precedent elsewhere in the Vale of Glamorgan.

Council Response

Green Wedges are local designations which serve as an urban containment mechanism intended to restrict the spread of built development beyond designated settlement boundaries and allocated development sites. Where designated, green wedges comprise the open areas around, and between, parts of settlements and seek to maintain the distinction between the countryside and built-up areas and prevent urban coalescence.

Planning Policy Wales Edition 12 (February 2024) (PPW) advises that green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust. PPW also advises that, unlike green belts, which should be protected for a longer period than the relevant current development plan, green wedges, where they are proposed, should be reviewed as a part of the development plan review

process (paragraph 3.64 refers).

In line with national policy, the Council has undertaken a review of the existing adopted LDP green wedge designations (Background Paper 27 - Green Wedges). In reviewing these designations, the Council has utilised the regionally agreed 'South East Wales Green Wedge Definition Criteria' Method Statement. This method statement outlines the policy and geographical context for green wedge designations across the region, explores the established methodologies used by local authorities to date and proposes a methodology that can be implemented on a consistent basis across South East Wales to assess and refine existing or candidate green wedges, employing an assessment proforma to record and map relevant information.

The methodology entails four stages of assessment, these are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

When assessed against these criteria, the review maintains the justification for a green wedge designation between Barry and Rhoose due to development pressures in the Barry, and Cardiff Airport area. However, the assessment also recognises the need for the Council to facilitate release of land to address housing need within the Vale and that the removal of land for the Key site allocation at Land West of Barry would not result in undermining the green wedge designation between Barry and Rhoose in line with the assessment methodology.

The site submission is supported by a technical briefing note prepared by EDP, which addresses the green wedge (GW). This notes that "*While the present wider GW designation provides a useful spatial planning function in preventing coalescence, the area containing the site, offers extremely limited functional contribution to this purpose and its removal from the designation would have similarly limited impact in this regard. A circa 2.5km of open countryside would remain as a gap, substantially larger than the 1.25km gap between other parts of Barry and Rhoose which are still deemed to function effectively as a GW*." It goes on to state that "*the location and topographic enclosure also limits the potential for encroachment into countryside. The original site is already dominated by the influence of adjacent housing and its enclosure indicates that wider impacts on open countryside would be negligibl*e." Overall, it concludes that "*the inclusion of the original site within the GW designation was not 'necessary' to its effective functioning. On that basis, the inclusion of the site within the GW fails to meet the Planning Policy Wales (PPW) requirement that such designations "include only that land which it is necessary to keep open in the longer term*".

Whilst the character of the countryside will inevitably change in this location, the Council shall ensure that the proposed development will integrate with the existing settlement pattern, incorporating green infrastructure to offset biodiversity impacts. It is noted that the Landscape and Visual Appraisal for the site identifies potential opportunities that the development may provide to create a stronger, more coherent and landscaped settlement

edge, and the incorporation of enhanced green infrastructure. Together these landscape interventions provide the opportunity to strengthen the green wedge boundary and improve long-term management of its boundary vegetation.

Accordingly, the Council is of the view that development of Land at North West Barry, and its removal from the green wedge has been fully appraised in line with both Planning Policy Wales and the agreed regional assessment methodology. Consideration has been given to the impact both visually through the landscape appraisal undertaken and in terms of residential amenity and is of the view that any impacts can be mitigated through sensitive design and appropriate landscape management.

Issue - Impact on the Historic Environment

- The Heritage Assessment commissioned by Persimmon (June 2025) is inadequate, methodologically flawed, and non-compliant with national policy and guidance.
- The proposed development lies near several heritage assets, including Porthkerry Country Park, which contains historic woodland and structures.
- Listed buildings and farmsteads in the surrounding rural landscape. Concerns were raised that the development would diminish the setting of these assets, reducing their historical and visual significance.
- The area forms part of a historic rural landscape, with ancient field boundaries, hedgerows and traditional agricultural patterns
- Development would erode the historic character of the area, replacing it with suburban housing.
- The site may contain undiscovered archaeological remains, given its proximity to known historic sites. No thorough archaeological assessment has been published.

Council Response

In response to objections raised to the submitted heritage statement provided by the site promoter and its failure to comply with national policy and guidance, the Council has reviewed the Heritage Assessment undertaken for Land West of Barry and considers that the assessment has been undertaken in accordance with national policy, and the overall conclusions are considered acceptable.

The Heritage Setting Assessment explicitly identifies and evaluates the significance of all relevant designated and non-designated heritage assets, with reference to Cadw's Conservation Principles. It assesses how setting contributes to that significance and the likely effects of change, in accordance with PPW paragraphs 6.1.7 and 6.1.9:

PPW para 6.1.7: "*It is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way*."

PPW para 6.19: "*Any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place.*"

The assessment has applied Cadw's Setting of Historic Assets in Wales (2017) 4 Stage methodology appropriately and proportionately and has identified meaningful assets which have been carried through to detailed assessment. This takes account of visual, functional, historic and experiential factors. The level of analysis within the assessment is considered appropriate for RLDP evidence, notwithstanding this, further detail and mitigation measures would be considered appropriate at the planning application stage where detailed masterplanning will be undertaken.

In addition, the Council will require an Archaeological Desk-Based Assessment to be undertaken, to identify any potential effects on the settings of designated heritage assets in the surrounding area of the site.

Consequently, it is the Council's view that objections raised are based upon disagreement with professional planning judgement, rather than any demonstrable failure to comply with Planning Policy Wales (PPW) or Cadw guidance.

Issue - Landscape Impact

- The land remains highly visible, contributes to the rural setting of Barry, and forms part of a continuous and sensitive landscape corridor.
- The site provides a clear and perceptible transition from town to countryside on the western approach to the town.
- Development would introduce built form, lighting, roads, and engineered landforms into an otherwise undeveloped landscape.

Council response

A Landscape Technical Note has been prepared which includes an initial Landscape and Visual Assessment (LVA) of the impact that the Land at North West Barry would have in relation to the landscape setting within the western edge of the settlement.

The LVA indicates that the site itself is of relatively low landscape value, with limited distinctive features and a strong influence from surrounding urban form. Wider landscape character is assessed as of moderate value, and forms only a small, peripheral and visually contained part of that landscape. Importantly, the LVA indicates that the proposed form of development would not intrude into prominent skylines, disrupt key vistas or materially affect the character of nearby designated landscapes or public recreational assets.

The appraisal acknowledges that development of the site would result in the loss of open agricultural land and would alter the character of the site itself from open fields to built form. This change would be most apparent to immediately adjacent residential properties, where there is potential for adverse effects on private views. The impacts, while material to local residents, are typical of edge-of-settlement development and are largely unavoidable given the site's location. In acknowledging these localised impacts, the assessment identifies a number of mitigation and enhancement measures, including the opportunity to create a stronger, more coherent and landscaped settlement edge, enhanced green infrastructure,

improved long-term management of boundary vegetation, and better integration with active travel and countryside access.

With regard to safeguarding the residential amenity of neighbouring properties the assessment recommends the use of buffer distances, sensitive landscape screening and limit development to 2 storey dwellings along this boundary.

Accordingly, while the Council acknowledges that the proposal would result in localised visual impacts on adjacent residents, the landscape appraisal indicates that landscape and visual effects would be limited in extent and capable of adequate mitigation. Furthermore, any future planning application will be required to be accompanied by a full Landscape and Visual Impact Assessment (LVIA), building on the principles of the initial assessment, alongside detailed design and landscape proposals reflecting any recommendations of the full LVIA.

It is acknowledged that the development would fundamentally alter the character of the land, and in the context of the existing LDP that land is countryside. However, while brownfield land is prioritised where possible, there is insufficient brownfield land (or land in core inner settlement locations) to come close to meeting housing need. Consequently, there are elements of the proposed housing supply that unavoidably require greenfield land and it is unavoidable in those circumstances that the character of the land will change. It is the purpose of the RLDP process to enable submitted candidate sites to be assessed, in order that housing need and growth can be met on the most appropriate sites, where those impacts are managed and minimised as far as possible. The Vale of Glamorgan is located within a National Growth Area in Future Wales, and this RLDP must be consistent with Future Wales. For the reasons give above, it is considered that the visual and landscape impacts are manageable and are balanced appropriately with the need for growth and housing (esp. affordable housing).

Issue - Loss of agricultural land

- The land is classified as Grade 3 agricultural land, considered valuable for food production in South Wales.
- Low grade agricultural land - but is regularly used for cattle grazing and arable farming.
- Further investigation is required of the agricultural land value through soil sampling as it is well known that the agricultural maps for the Vale of Glamorgan are poor and inaccurate.

Council Response

National planning guidance specifies that local authorities should seek wherever possible to avoid the development of Grades 1, 2 and 3a agricultural land which are the best and most versatile agricultural land (BMV). Accordingly, the consideration of BMV Agricultural Land has been a key consideration at all stages of plan preparation.

The Council's candidate site assessment has examined the agricultural land quality of sites submitted to the Council. The assessment utilises the latest national predictive agricultural

land classification (ALC) maps for the Vale of Glamorgan. These indicate that Land at North West Barry is classified as being a mix of Grades 3b and 4 agricultural land and therefore its development would not be contrary to national planning policy.

Issue - No Requirement for Additional Housing in Barry

- Barry does not need any more houses.
- Barry is being disproportionately targeted for housing to solve Cardiff's shortages.
- It is queried who the future occupiers of the homes would be.
- Other sites/areas should be considered.
- There are lots of space in the Vale, Barry has its fair share already.
- Large number of units unnecessary other than to meet Welsh Government targets.
- The proposed houses will not be social housing or houses for first time buyers.
- The Vale of Glamorgan needs housing suited to older single people, and the proposed development does not meet that need.
- The site should provide 100% social housing/ housing association houses and no executive 4-bedroom houses. Building larger homes will just encourage more people to move out of the unaffordable Cardiff housing market.
- Empty Properties should be used instead of allocating new sites.

Council Response

New housing is required to meet forecast increases in the population and in household formation. The housing requirement and the assumptions that have informed it are set out in BP7 Housing and Employment Growth Options and BP8 Demographic Evidence. The projection has been derived from a range of information sources.

The Council's Local Housing Market Assessment highlights that there is high affordable housing need within the Vale of Glamorgan. This affordable housing need across the authority, indicating there to be an annual need based on RLDP projections for 1,114 affordable units during the next five-years and a further 196 units per annum over the following 10 years, equating to a need for 502 affordable units per annum over the 15 year period.

In relation to housing needs in Barry, as of February 2026, the Council's waiting list identified that there were nearly 4,000 persons/households registered on the Council's Housing waiting list (over 1,800 in the highest priority need) and some 7,700 in total across the Vale as a whole. The proposed housing allocation at North West of Barry is within the Barry affordable housing market area, where the target as set out in Policy SP8 is for 30% of all units to be affordable. The site will therefore be required to deliver a minimum of 30% affordable housing and contribute towards much-needed housing for those in the greatest need. The affordable housing will consist of 65% social rented and 35% low cost home ownership (LCHO), the latter is designed to help people, particularly first-time buyers or those on lower incomes, access home ownership when purchasing on the open market is unaffordable. The size of affordable homes will be based on local need, as identified by the LHMA and waiting list data. It will be expected that across the development there will be a mix of unit types, sizes and tenures.

Social rented homes will be allocated to those households on the Council's Homes4U housing allocations policy, which is a common allocation policy for the Council and Registered Social Landlords (RSLs) that own stock in the Vale. LCHO properties are made available through the Council and RSL partner's Aspire2Own. To be eligible applicants must meet a number of criteria, including be living or working in the Vale of Glamorgan.

The Council recognises concerns regarding the use of existing empty properties to meet housing need and acknowledges that bringing such properties back into use forms an important part of its wider housing strategy. There are currently over 500 long-term empty properties in the Vale, and the Council is actively working to reduce the number of long-term empty homes through a range of interventions including advice, enforcement and fiscal measures, such as Council Tax premiums. However, while the reuse of empty homes makes a valuable contribution, it is not sufficient on its own to address the scale, nature and urgency of identified housing need within the Vale. Many properties recorded as vacant are not readily available for occupation due to reasons such as disrepair, ongoing probate, ownership disputes, market churn, or because they are not of a size, type or tenure that matches current demand. In addition, the turnover of vacant properties is unpredictable and cannot provide a reliable supply to long-term housing requirements.

As explained in detail in the responses to Policy SP1 Sustainable Growth Strategy and SP2 Settlement Hierarchy, Barry is the largest settlement in the Vale and offers the greatest range of services and facilities. The level of growth is commensurate with its position in the settlement hierarchy.

Given the high prevalence of affordable housing need in Barry, and Barry's position in the settlement hierarchy, the identification of housing land within the town is fully justified and is in accordance with the RLDP growth strategy objectives.

Issue - No justification for identifying the site

- This site was not selected through evidence-led strategic planning. It was included late when preferred options failed.
- The site is contrary to the Vale's own RLDP Preferred Strategy
- The Council previously deemed this site unsuitable compared to North East Barry due to its smaller scale and limited placemaking potential. A site on the East of Barry is preferred to ease congestion.

Council Response

The RLDP Preferred Strategy identified a key site to the North East of Barry, which had a capacity for 1,500 dwellings, 900 of which were anticipated to be delivered in the plan period. As detailed in the Housing Growth in Barry consultation document (June 2025), due to deliverability issues associated with different land ownership, it was determined that it would not be appropriate to carry the site North East of Barry forward as an allocation in the Deposit RLDP. It was therefore necessary to consider alternative options to accommodate housing growth in Barry.

A smaller site comprising the northern 3 parcels of land part of allocation HG1 KS1 Land at North West Barry was originally submitted as a candidate site (449 Land at Weycock Cross) and following an assessment of the site, it was concluded at Preferred Strategy stage that the site was suitable for further consideration. The site was not identified as a key site allocation on the grounds that "*it would be more beneficial to address the housing needs of Barry strategically through the identification of a Key Site at North East Barry, which would deliver circa 1,500 dwellings within the plan period and beyond. This large urban expansion of the town would deliver a wider range of benefits particularly in addressing the high levels of affordable housing present in Barry, and from a placemaking perspective in delivering a mix of uses and infrastructure improvements than would be presented by developing this smaller site of circa 180 dwellings. This site would only be required to be considered further if the key sites in the Barry area do not proceed*."

Following the reconsideration of the North East Barry, and larger site at North West Barry was put forward, which increased the total site area and the number of dwellings from 180 to 376. The larger site offered a greater opportunity to deliver meaningful numbers of affordable units as well as other mitigation, and also offers the potential for significant green infrastructure improvements.

Whilst the site was not the original first choice site for future housing growth Barry for the reasons specified, it has been considered to be acceptable in principle throughout the RLDP process and is considered to meet the RLDP Strategy.

Issue - Prioritise Brownfield Land

- There are numerous existing brown and grey field sites nearby (with adequate infrastructure) and within the Vale of Glamorgan that could be utilised if needed.
- Planning Policy Wales states and insists that "Brownfield Sites" are to be used in preference to "Greenfield Sites".
- Future Wales: The National Plan 2040, through Policies 2 and 7, instructs planners to pursue compact growth, brownfield development, and sustainable infrastructure. This site delivers none of those outcomes.
- Council should consider brownfield sites for example Barry Docklands / Waterfront, Vacant or under-used employment land, large surface car parks and under-utilised town-centre plots, empty or long-term vacant properties within Barry.

Council Response

A key component of the RLDP Strategy is "Allowing for regeneration opportunities on previously developed and underutilised land." The Adopted LDP has been successful in terms of bringing forward redevelopment of brownfield land, such as that at Barry Waterfront. The RLDP seeks to prioritise brownfield opportunities over greenfield sites wherever possible and many brownfield sites in the Barry area are allocated for housing (including at Neptune Road, Hayes Lane and Pencoedtre School). However, even with these allocations, there is not sufficient viable and deliverable brownfield land to accommodate all

the proposed growth over the plan period and therefore greenfield land will also therefore need to be released.

In preparing the RLDP the Council has undertaken an Urban Capacity Study that has assessed the potential of brownfield land opportunities within Barry, as set out in background paper BP19A. This considers the potential contributions from the following potential brownfield sources:

- Vacant land within settlement boundaries.
- Public body land and rationalisation.
- Conversions and reuse of commercial-to-residential conversions, flats above shops, and reuse of underutilised buildings.
- Empty homes, and
- Vacant / derelict buildings and subdivision of existing housing provide only marginal additional supply.

Whilst the assessment provides a theoretical number of dwellings from each source, these units, this contribution alone will not deliver a level of housing in Barry that is commensurate with Barry's position as a key settlement as many opportunities are relatively small in scale. Since much of the potential sources are not within public ownership, they will rely on landowner willingness, market appetite and development viability. Similarly for land owned by public bodies, the availability of sites will depend on the organisational strategy and operational needs of the land.

The Urban Capacity Study therefore concludes that whilst it has identified a range of potential sources of brownfield land there exists a range of limiting factors to their delivery. Accordingly, the study has considered these constraints and provides realistic assumptions on the potential windfall contribution that brownfield developments may provide over the RLDP plan period. Projecting these figures over the plan period identifies that 396 dwellings could be provided in Barry.

From this the Council has determined that due to constraints on development there is a need to identify additional greenfield land within Barry to address the housing needs for the settlement in line with the RLDP strategy.

Issue – Alternative Sites should be considered

- Explore alternative locations or solutions that would have a less detrimental impact on the community.
- A new settlement should be provided at Llandow instead.
- Can/should the land at Model Farm include a mix of commercial and 376 residential developments

Council response

Proposals for new settlements such as a new village at Llandow would be contrary to national planning policy which considers that such proposals should only be identified through the Strategic Development Plan process.

Model Farm is allocated for employment uses aligned with the Welsh Government's Cardiff and St Athan Enterprise Zone and is allocated as a key employment site. It is not considered appropriate for housing.

Issue - Previous planning permission to develop site was refused

- Previous planning applications in 2013 (200 houses) was strongly opposed and rejected- what has changed?
- The site has already been tested and found unsuitable through earlier applications and examination.
- The fundamental constraints identified then still apply, and in many cases have intensified.

Council response

Previously planning application (reference 2013/00701/OUT) was considered against the adopted Vale of Glamorgan Unitary Development Plan which was at the time the statutory development plan for the Vale of Glamorgan. In considering the application, the site was located outside of a defined settlement boundary, contrary to the principles of the adopted UDP policies without sufficient material evidence to support the granting of the application.

In addition, the Council was in the process of adopting a new development plan (now the current Adopted Local Development Plan). The site at Weycock Cross was submitted as a candidate site for consideration as a potential housing allocation but was not deemed suitable for inclusion following assessment against the plan's objectives, candidate sites assessment and the availability of the large brownfield regeneration site at Barry Waterfront.

In seeking planning permission, the applicant sought to justify permission for the site on the grounds that the Council did not have a 5-year housing land supply which was at the time a requirement under national planning policy (technical advice note 1 housing land supply). The Council however provided evidence illustrating the provision of a 5-year land supply as a result of recent planning approvals on allocated and preferred Draft LDP sites.

The Council also argued that granting permission would prejudice the emerging LDP strategy and undermine the implementation of the LDP and the fundamental process of how the Council allocates appropriate land for housing through the LDP process. Furthermore, granting permission would be a clear contradiction to the aims and objectives of the emerging plan given that the site was not identified within the Draft LDP and was considered at the time to not be an appropriate extension of the town or an appropriate site to meet strategic housing needs of the emerging LDP.

In addition, the Council opposed the proposed development on the basis that the applicant had not provided sufficient supporting evidence regarding traffic impact assessment and ecological assessment to mitigate against the impact of development. The officer report also highlighted that discussions regarding viability raised concerns that the development could not support the necessary s106 contributions to deliver the required affordable housing provision, education, sustainable transport community facilities and open space, indicating that the applicants deemed the package of contributions would render the scheme unviable.

The officer report identified following 5 clear reasons for refusal:

1. The proposed residential development is outside the defined settlement boundary of Barry and there is no overriding justification or material consideration to outweigh the in-principle policy presumption against such development. As such the development would be contrary to Polices ENV1 - Development in the Open Countryside, and HOUS3 - Dwellings in the Countryside of the adopted Vale of Glamorgan Development Plan 1996 – 2011 and Planning Policy Wales (Edition 5) November 2012.

2. By virtue of the parameters for development and indicative site layout forming part of this outline submission, the proposed development of 200 No. houses would adversely prejudice the open nature of the landscape and countryside and consequently the identified Green Wedge between Barry, Rhoose and St. Athan causing a detrimental effect upon the landscape and the amenity value of the land. As such the development would be contrary to Policy ENV3 - Green Wedges of the adopted Vale of Glamorgan Development Plan 1996 – 2011 and Planning Policy Wales (Edition 5) November 2012.

3. The proposal has provided insufficient information on which to assess the application with regard to impact on a European Protected Species (Dormouse). The submitted survey 'Ecological Assessment' November 2013 does not provide the appropriate mitigation/compensation package for the conservation of dormouse required by the Local Planning Authority prior to determination. The development would therefore be contrary to Policy ENV16 - Protected Species of the Adopted Unitary Development Plan 1996-2011 and Planning Policy Wales (Edition 5) November 2012.

4. The development as proposed would be considered unsustainable by virtue of failing to mitigate the effects of up to 200 dwellings on local infrastructure including schools, the highway network and community facilities, whilst not contributing towards the evidential need for affordable housing and public open space within the area. As such, the proposals are considered contrary to Strategic Policies 2 and 8, Policies HOUS12 - Affordable Housing, ENV27 - Design of New Developments and HOUS8 - Residential Development Criteria of the Vale of Glamorgan Unitary Development Plan 1996-2011, plus Supplementary Planning Guidance 'Planning Obligations' and the Supplementary Planning Guidance 'Affordable Housing', the Vale of Glamorgan Affordable Housing Delivery Statement, Technical Advice Note

No. 2 ‘Planning and Affordable Housing’ and Technical Advice Note 18 ‘Transport’.

5. The proposed development would be contrary to the aims and objectives of the Vale of Glamorgan Deposit Local Development Plan, and as such would pre determine decisions about the location, scale and phasing of such new development which ought properly to be taken with the context of the Local Development Plan and the development is therefore considered premature pending the adoption of the Deposit Local Development Plan, and would have a significant detrimental impact on the setting of the important settlement of Barry, contrary to the advice and guidance in Chapter 2 of the Planning Policy Wales (5th Edition 2012).

Following the Council’s refusal of the application, the applicant lodged an appeal on the decision of refusal (Appeal Reference APP/Z6950/A/15/3010121)

In considering the applicant’s appeal and the Council’s reasons for refusal the Inspector concluded that the adopted Vale of Glamorgan UDP, although time-expired, was not outdated or superseded and remained consistent with national planning policy. Accordingly, given its location outside of the defined settlement boundary for Barry, the proposal was found to conflict with UDP policies ENV 1, ENV 3, HOUS 2 and HOUS 3. The Inspector also found that the lack of a 5-year housing land supply did not justify an exceptional circumstance required to justify inappropriate development within a Green Wedge, particularly given the proposal’s conflict with the development plan and its greenfield location.

Further consideration was given to the impact on the green wedge by the Inspector, who concluded that whilst landscape and visual effects were assessed as no worse than minor adverse, development of the green wedge would result in loss of openness and constitute a westward incursion from Barry towards Rhoose, undermining the Green Wedge’s primary purpose of preventing coalescence and would therefore be contrary to the policies of the adopted UDP and to which substantial weight was attached to.

Whilst, the Inspector gave limited weight to the emerging LDP, he considered that the development of this site should be considered as part of the overall LDP strategy. He did view that the inclusion of a site of the scale proposed should be considered through the LDP process, and that development of the site should be considered as part of an overall LDP review, which provides the proper process for considering changes to the boundaries of settlements and green wedges, rather than making such changes through the consideration of individual applications.

Finally, on matters regarding s106s contributions, highways, noise, ecology and drainage, following the submission of additional evidence by the applicant, the Inspector considered that these were capable of being addressed by condition but did not outweigh the identified policy harm. Accordingly, the Inspector recommended that the appeal be dismissed.

Whilst the Council previously defended its decision to refuse planning permission this decision was made in light of the then emerging Vale of Glamorgan LDP, the Council having

undertaken a review of its adopted LDP, is preparing its Replacement LDP, through which a new evidence base to inform its new strategy for the Vale of Glamorgan over for the period 2021-2036 which on adoption shall replace the current adopted LDP which runs to 2026. In preparing the RLDP, the Council has also undertaken reviews of existing housing and employment need, settlement boundaries, environmental designations, and green wedges, the latter being reviewed against the regional South East Wales Green Wedge Definition Criteria' Method Statement.

In light of this new evidence base and the RLDP strategy, the Council is of the opinion that the proposed development would contribute to the delivery of the RLDP strategy and be consistent with the role and function of Barry as the Key Settlement within the Strategy. In addition, the Council has considered the suitability of reducing the green wedge to facilitate the inclusion of Land at North West Barry as being appropriate within the context of the regionally agreed Green Wedge Methodology. This accords with the Inspector's view that such matters be considered through the LDP review process rather than through the planning application process.

In considering the suitability of Land at North West Barry, the Council has undertaken detailed site viability work to ensure that development can financially support the necessary requirements for affordable housing, community infrastructure and necessary highway improvements. The Council's Strategic Transport Assessment has also considered and identified mitigation measures to address projected traffic generation.

Accordingly, through the RLDP review and supporting evidence base the Council is of the opinion that the Land at North West Barry addresses previous issues and areas of objection raised by the Council in the consideration of previous planning applications at Weycock Cross, including the impact on the green wedge and landscape character within the locality of the site, which the Council is satisfied can be safeguarded through sensitive design, the integration of green infrastructure with the site, net biodiversity measures and comprehensive landscape management.

Issue - Land ownership issues

- The highway mitigation scheme would require land in private ownership on Pontypridd Road.

Council Response

A representation has been made relating to the ownership of a small section of highway verge in front of a property on Pontypridd Road, which may be required as part of the widening for the roundabout mitigation scheme on the Pontypridd Road arm. The Highways Department have reviewed their records and the area in question, alongside the remainder of the verge, has formed part of the adopted highway since November 1956 and it is therefore the Council's position that this part of the mitigation scheme would not involve any third-party land.

Issue - Other matters raised

- Use traditional architecture design codes for all new construction
- Impact on Residential Amenity.
- Disruption during construction phase.
- Lack of meaningful public open space benefits to existing residents.
- A site-specific Health Impact Assessment has not been undertaken.
- Negative impacts on property values.
- Loss of views.
- Anti-Social Behaviour and Crime.
- Concern about the political decision-making process.

Council Response

Use Traditional Architecture Design Codes

The Council does not intend to mandate design codes for the site, but at planning application stage, as set out in Policy SP4, major developments will need to prepare Placemaking Statements which consider placemaking principles.

Residential Amenity Impacts

The protection of residential amenity is a material planning consideration when determining planning proposals. Presently, the masterplans contained within the Deposit RLDP are indicative and further detailed work shall be required at the planning application stage, which will include a requirement to incorporate suitable separation distances from existing residential properties, landscaping, and design solutions to protect neighbouring residential amenity, safeguard privacy and reduce visual impacts.

In relation to potential disruption during the construction phase, it is recognised that some temporary disturbance is inevitable with any building works, this will normally be controlled at planning application stage through a planning condition requiring a Construction Environmental Management Plan (CEMP), which will set out detailed measures to manage construction impacts.

Access to Open Space to existing residents

The outline masterplan contained within the RLDP for Land West of Barry, indicates that a large area of the site will be retained as open space to the south of the site, alongside smaller areas of informal open space throughout the site. As the site is currently a private agricultural field with no right of access, the provision of several new publicly accessible open spaces will be beneficial to the wider community. Proposals for access to these areas for existing residents will be considered at the planning application stage.

Health Impact Assessment

Policy SP5 Creating Healthy and Inclusive Places and Spaces requires residential developments greater than 100 dwellings to be supported by a Rapid Health Impact Assessment to highlight potential health impacts from the development, and to identify opportunities for the incorporation of measures that contribute towards health and wellbeing. This will be undertaken as part of a planning application.

House Prices

Concerns regarding a potential reduction in house prices are also noted; however, the effect of a development on property values is not a material consideration in planning decision-making. This position is well established through planning guidance and appeal decisions, which confirm that land and property values fall outside the scope of planning control.

Loss of view

It is well established in planning law that there is no statutory right to a private view. While it is acknowledged that the proposed development may alter the outlook from some neighbouring properties, this is not a material planning consideration in itself. The planning system seeks to protect living conditions in terms of matters such as privacy, daylight, sunlight, and overbearing impact, rather than the preservation of private views.

Anti-Social Behaviour

In respect of potential anti-social behaviour, on large developments the Council formally consults the South Wales Police Designing Out Crime Officer who provides advice in respect of incorporating measures to ensure developments are safe and reduce opportunities for anti-social behaviour.

Decision-making process

Each stage of the political reporting process has been carried out in line with the Council's constitution and the Council's Multi-Location Meetings Policy.

Council Overall Response

Following detailed review of the representations submitted in relation to Site KS1 Land at North West Barry, the Council acknowledges the breadth of concerns raised, including infrastructure capacity, transport impacts, environmental and heritage constraints, amenity considerations raised within the representations. Infrastructure delivery and appropriate mitigation will be essential to ensure that the development comes forward in a coordinated and responsible manner, and these matters have been considered in the allocation of the site.

Many of the matters raised relate to detailed design, technical and operational issues that are most appropriately assessed when a planning application is submitted and full development proposals are available. However, for the purposes of plan preparation, the Council is satisfied that there is sufficient evidence to demonstrate that the site represents an appropriate, sustainable and deliverable allocation within the RLDP. The allocation is

considered to accord with the Plan's strategy and strategic objectives and is therefore regarded as sound.

HG1 KS2 NORTH OF DINAS POWYS, OFF CARDIFF ROAD

Representation ID	Respondent Name	Representation Type
4721	Mr Luke Bellamy [2298]	Object
4393	Mr Martin Clements [2102]	Object
4396	Mr Tim Hackett [2751]	Object
4414	Dinas Powys Community Council (Mrs Jeanette Haigh) [1472]	Object
4417	Helen Kennedy [2761]	Support
4438	Mr Andrew Bowdler [2202]	Object
4478	Peter Kennedy [2807]	Support
4480	Audrey Jenkins [2809]	Object
4515	Mrs Debbie Totterdell [1547]	Object
4518	Mr Karl Watkins [2830]	Support
4519	Mr Karl Watkins [2830]	Object
4522	Mrs Christine Gupwell [2833]	Object
4527	Miss Diana Collins [2837]	Object
4528	Mr Alan Stamp [2345]	Object
4529	Mrs Elizabeth Stamp [1536]	Object
4530	Jennifer Williams [2840]	Object
4536	Mrs Cathy Farr [1818]	Object
4537	Ms Andrea Holloway [2843]	Object
4550	Mrs Helen Cook [2850]	Object
4559	Mrs Alison Hubbard [2863]	Object
4561	Mrs Anne Hill [2865]	Object
4589	Mr David Barton [2683]	Comment
4646	Mr David Davies [1503]	Object
4648	Mr James Hill [2873]	Object
4649	Mrs Se Fitt [2874]	Object
4650	Mr, Mr and Mrs A,N and R Sweetman [2875]	Object
4676	Mr Tim Griffiths [2578]	Object
4684	Mrs E Kemp [2460]	Support
4693	Ms Melanie Daniel [1548]	Object
4702	Miss Mari-Wyn Elias-Jones [1982]	Object
4716	Mr Peter Coleman [2116]	Object
4717	Mrs Teresa Britton [1644]	Object
4723	Mr Luke Bellamy [2298]	Object
4733	Mrs Belinda Morgan [2090]	Object
4734	Mrs Emily Kinch [2905]	Object
4735	Mrs Francesca Bell [2906]	Object
4736	Mrs Francesca Bell [2906]	Object
4737	Mr Glen Monteiro [1967]	Object
4748	Mrs Cathie Jackson [2012]	Object
4749	Miss Delyth Vaughan [1654]	Object
4750	Mrs Kim Mills [2913]	Object
4751	Mrs Ruth Clogg [2914]	Object
4752	Mr Elgan Evans [2915]	Object
4753	Mrs Rhian Evans [2917]	Object

4754	Mrs Shelley Williams [2352]	Object
4751	Mr John Clogg [2947]	Object
4756	Mr Michael Wilson [2918]	Object
4758	Justine Pang [2920]	Object
4759	Mr Lewis Cook [2921]	Object
4760	Miss Samantha James [2027]	Object
4761	Mrs Sophie Williams [2922]	Object
4762	Mr Jack Donnelly [2924]	Object
4763	Mrs Shirley Richardson [2927]	Object
4764	Mrs Hannah Williams [2928]	Object
4765	Ms Nicola Meredith [2930]	Object
4766	Miss Lauren Knight [2103]	Object
4767	Mr Ian Christopher [1808]	Object
4768	Miss Rachel Brown [2932]	Object
4769	Mrs Carla Bluett [2931]	Object
4770	Mrs Amy Murphy [1788]	Object
4774	Mr Nicholas Stork [2935]	Object
4777	Mr Nic Hanson [1653]	Object
4778	Mrs Cristina Moreau [2939]	Object
4779	Mrs Christine Bateman [2940]	Object
4780	Mr Scott Pride [2941]	Object
4781	Mr Paul Bateman [2943]	Object
4782	Mr John Lewis [1897]	Object
4783	Mr Mike Burden [2946]	Object
4784	Rachel Norman [1822]	Object
4785	Ms Priscilla Macgregor [2945]	Object
4786	Peter Kennedy [2807]	Support
4791	Mr Paul Carroll [2838]	Object
4793	Mrs Claire Newland [1753]	Object
4794	Miss Siobhan O'Connell [2951]	Object
4796	Mrs Lucy McQuade [2950]	Support
4797	Miss Katie Morgan [2953]	Object
4799	Mrs Sian Phillips [2955]	Object
4804	Mr Robert Fisher [2958]	Object
4805	Mrs Debra Fisher [2959]	Object
4807	Mrs Jane Roberts [1709]	Object
4808	Miss Siobhan O'Connell [2951]	Object
4810	Thomas Brinn [2960]	Object
4811	David & Madeline Thorne [2961]	Object
4812	Llandough Community Council (Clerk) [236]	Object
4813	Mr Nick Beddoe [2963]	Comment
4814	Mr Sam Hume [2962]	Object
4815	Mrs Lindy Harris [2964]	Object
4816	Ms Ros Granger [2965]	Object
4819	Mrs Christine Real [2954]	Object
4823	Mrs Jean Harrison [2969]	Object
4825	Mr N Evans [2970]	Object
4826	Mrs Elizabeth Davis [1552]	Object
4828	Mrs Beata Price [1586]	Object
4829	Mrs Amanda Paines [2972]	Object

4830	Mr Alun Pincombe [2974]	Object
4831	Mr Philip Hayes [2976]	Object
4832	Mrs Amy Harding [2977]	Object
4833	Mrs Amy Harding [2977]	Object
4835	David Pain [2978]	Object
4836	Mrs Christine Boston [2944]	Object
4837	Mrs Sarah Miller [2973]	Object
4838	Alan Blakoe [2980]	Object
4839	Mrs Christine Begg [2981]	Object
4840	Ms Dionne Shillabeer [2982]	Object
4841	Mrs Rachel Whitehurst [2186]	Object
4842	Mr FRANK COLEMAN [1496]	Object
4843	Miss Hannah Lloyd [1673]	Object
4844	Mrs Zelda Smith [2984]	Object
4846	Mrs Vivyenne Pritchard [2986]	Object
4849	Miss Candice Boyes [2988]	Object
4850	Mr Kevin Davis [1947]	Object
4851	Mr Andy Paterson [2045]	Object
4852	Mr and Mrs M A Hayley [2989]	Object
4853	Mr Mark Somers [1850]	Object
4854	Mr Mike Burden [2946]	Object
4855	Mr Chris Lewis [2990]	Object
4856	Miss Claire Warner [1562]	Object
4861	Mrs Ailsa Enos [2991]	Object
4866	Mrs Michelle Doran [1782]	Object
4867	Mr Mathew Hobbis [2992]	Object
4868	Mr Charlie Laundon [2993]	Object
4869	Janet Rayer [2994]	Object
4874	Mrs Marilyn Stansfield [2998]	Object
4875	Mrs Sheena Jenkins [1878]	Object
4877	Mrs Rachael Cronin [2999]	Object
4881	Mr Simon Evans [2176]	Object
4882	Mr Oliver Payne [3003]	Object
4886	Mr Richard Hume [3005]	Object
4887	Mr Paul Brown [2138]	Object
4896	Mrs Louise Hesp [1676]	Object
4897	Mr David Hicks [3008]	Object
4898	Mr Leovigildo Ferrer [3009]	Object
4899	Ms Julie Oaten [3010]	Object
4902	Dr Matthew Shields [1525]	Object
4903	Mrs Lisa Burke [3013]	Object
4906	Ms Sharon Smith [2173]	Object
4908	Mrs Cristina Moreau [2939]	Object
4914	Mr Adey Jewkes [2096]	Object
4915	Mrs Jo Hurley [3017]	Object
4916	Mrs Rachelle Leake [3018]	Object
4917	Mrs Rachelle Leake [3018]	Object
4920	Mrs Cathie Jackson [2012]	Object
4923	Stephen Bull [3021]	Object
4925	Mr Richard Jackson [2333]	Object

4938	Mrs Margaret Donovan [3025]	Object
4939	Mr Maurice Lawrence [3026]	Object
4940	Mrs Carol Woodfield [1641]	Object
4942	Ms Bryony Amesbury [1872]	Object
4943	Mr Tim Edwards [1554]	Object
4944	Mr and Mrs Peter and Sylvia Thompson [3030]	Object
4945	Mr David Green [2203]	Object
4946	Mrs Paula Bugler [3031]	Object
4954	Miss Charlotte Blake [2923]	Object
4956	Miss Laura Morris [3039]	Object
4957	Miss Cath Thomas [3040]	Object
4961	Mr Brian Eccleshare [2099]	Object
4962	Mrs Charlotte Thrupp [3042]	Object
4965	Mrs Rebecca Rossiter [1601]	Object
4967	Mr John Fearon [3043]	Object
4968	Mrs Michaela Fearon [3044]	Object
4969	Mr Jonathan Poley [3045]	Object
4970	Mrs Kathryn Wintle [3046]	Object
4971	Mrs Anne Jones [3048]	Object
4972	Mrs Ceri Morgan [3049]	Object
4973	Mr Michael Hicks [3050]	Object
4974	Geraint Scott [2048]	Object
4975	Mrs Stacy Scott [3051]	Object
4979	Mr Tim James [3052]	Object
4981	Mrs Jennifer James [3053]	Object
4986	Mr Alexander Whitehurst [3055]	Object
4989	Ms Dianne Hayes [3058]	Object
4992	Mr Peter Robinson [3061]	Object
4994	Mr Mark Taylor [3063]	Object
4995	Mrs Avril Terrar [3066]	Object
4998	Miss Kate Williams [3067]	Object
5001	Mrs Sian Board [3070]	Object
5002	Mr Nigel Williams [3071]	Object
5003	Mrs Valerie Leung [1480]	Object
5004	Mrs Sheila Allsop [1918]	Object
5005	Dr Stuart Keeping [3073]	Object
5006	Miss Victoria Williams [1861]	Object
5011	Mrs Angharad Gaylard [3024]	Object
5013	Mr M L Ham [3076]	Object
5015	Mrs Alison Harries [3078]	Object
5017	Mr Mark Richards [3079]	Object
5018	Mr Alan Griffiths [3080]	Object
5019	Mrs Sara Siddall [3082]	Object
5020	Mrs Valerie Pronence [3083]	Object
5021	Mrs Nicola Foxwell [1749]	Object
5023	Mrs Stephanie Atkins [1923]	Object
5024	Mr and Mrs Roy Gee [1733]	Object
5025	Mrs M Perkins [2251]	Object
5026	Mrs Victoria Pici [3084]	Object
5027	Mrs Judith Richards [1731]	Object

5028	Mr Ieuan Richards [1729]	Object
5064	Sarah Teagle [3110]	Object
5065	Mr Darren Hubbard [3113]	Object
5071	Mr Christopher Bates [2248]	Object
5072	Mr John Moffatt [3114]	Object
5077	Mrs Susan Teagle [3115]	Object
5079	Mrs Sian Ellis [3118]	Object
5081	Sarah & Lee Murphy [3119]	Object
5084	Mr Dewi Gaylard [3068]	Object
5086	Miss Jane Brocklehurst [3121]	Object
5087	Mrs Rebekah Hubbard [3120]	Object
5089	Mrs Carolyn Mirza-Davies [1686]	Object
5090	Mrs Louise Passchier [2068]	Object
5092	Mrs Linda Wilcock [3125]	Object
5093	Mr Stephen Keogh [3126]	Object
5094	Mrs Janice Hooper [2144]	Object
5095	Mrs Joyce Evans [2015]	Object
5098	Mr Stephen B Hann [1986]	Object
5102	Mr Peter Coleman [2116]	Object
5107	Mr Josh Andrews [3128]	Object
5109	Mr Malcolm Lane [3130]	Object
5111	Mr Stefan Passchier [2276]	Object
5119	Mr Yu Sing Leung [3132]	Object
5136	Dr Sara Collins [3139]	Object
5137	Mrs Bethany Barnham [1551]	Object
5138	Mrs Lauren Barnham [3141]	Object
5139	Mrs Charlotte Wise [3142]	Object
5140	Miss maxine hadley [1916]	Object
5141	Mrs Caroline Hadley [3143]	Object
5153	Mr Kenneth Lim [1636]	Object
5161	Mrs Karen Lim [1634]	Object
5163	Mr Peter Lynch [3151]	Object
5180	Mr and Mrs Colin Sim [1920]	Object
5189	Mr Roger Bishop [3159]	Object
5193	Mrs Wendy Lynch [3160]	Object
5199	Mrs Katie Hearn-Cross [1767]	Object
5216	Mrs Brenda James [3170]	Object
5217	Mr Michael James [3169]	Object
5218	Mr Simon James [1851]	Object
5221	Mr Gary Williams [3172]	Object
5225	Mrs Katherine Evans [2209]	Object
5227	Mrs Linda Hobbis [1893]	Object
5229	Miss Carelyn Boughton [3177]	Object
5230	Mr Paul Mason [3107]	Object
5231	Mr Ian Symonds [1106]	Object
5232	Carole Sian Robertson [3181]	Object
5233	Dr Mohammed Mirza [3180]	Object
5236	Miss maxine hadley [1916]	Object
5241	Mrs Lynn Cox [3188]	Object
5242	Mrs Sandra Stowe [3187]	Object

5243	Mr Paul Marks [3189]	Object
5244	Mr Terry Follett [2159]	Object
5247	Mr J.S Rosser [3190]	Object
5251	Mr Thomas Cockayne [3176]	Object
5265	Mrs Louise John [2265]	Object
5268	Dr Trevor Humby [3198]	Object
5269	Shirley Willis [3196]	Object
5276	Mr Richard Hird [3202]	Object
5280	Mrs Lowri Bull [3206]	Object
5294	Ms Fen Butcher [3214]	Support
5301	Mr Sean Worrell [3217]	Object
5306	Mrs Christiana Lindsey [3227]	Object
5307	Mr Ian Chambers [3228]	Object
5361	Mr Kevin Totterdell [3243]	Object
5366	Miss Jessica Clogg [3244]	Object
5413	Mrs Jennifer Rhodes [3246]	Object
5415	Mr Christopher Barnes [3247]	Object
5439	Namika Birchall [3257]	Object
5459	Mrs Jacquelyn Brinkard [2301]	Object
5460	Mrs Avril Allen [3266]	Object
5472	Mr Edmund Keane [2329]	Object
5480	Ms Robyn Keane [3270]	Object
5483	Mrs Thea Keane [2330]	Object
5492	Ms Paula Bailey [3272]	Object
5504	Mr G.W Wilton [3277]	Object
5506	Mr Simon Wilson [3279]	Object
5513	Mrs Gaynor Wilson [3280]	Object
5515	Mrs Janet Black [1566]	Object
5526	Mrs Hilary May [2309]	Object
5533	Mrs Angela Jones [3286]	Object
5535	Mr & Mrs Andrew Locker [1745]	Object
5536	Mrs Clare Tomlinson [2011]	Object
5538	Mr Simon Groves [3287]	Object
5539	Mrs Clare Tomlinson [2011]	Object
5556	Mr Corrado Ruta [2774]	Object
5617	Mrs Maria Howland [3309]	Object
5618	Mr Liam Roche-Lamerton [3310]	Object
5628	Mrs Hanna Rouse [3319]	Object
5650	Mr David Entwistle [3264]	Support
5682	Mr John McManus [3333]	Object
5687	Antoinette Dowdall [3335]	Object
5698	Mr David Richards [3336]	Object
5721	Mr Marcello Apollonio [3341]	Object
5724	Mrs Rebecca Evans [2069]	Object
5747	Mr Mitchell Davies [3347]	Object
5763	Prof Carole Rakodi [1751]	Object
5764	Mrs Elaine Davies [3348]	Object
5792	Miss Laura Waddilove [2060]	Object
5795	Mrs Zoe Follon [3375]	Object
5811	Mrs Alyson Brown [2041]	Object

5818	Mr Leigh Hutchings [1797]	Object
5819	Miss Chloe Devereux [3384]	Object
5820	Mrs Mandy Hutchings [3386]	Object
5822	Miss Susan foley [2105]	Object
5826	Richard Griffiths [3389]	Object
5831	Mr Justin Joyce [3391]	Object
5833	Mr Peter Davis [1531]	Object
5838	Mr Simon Tomlinson [3396]	Object
5841	Dinas Powys Community Council (Mr Stephen Griffiths, Councillor) [3372]	Object
5842	Mr R Todd [3397]	Object
5843	Ms Rhian Williams [3398]	Object
5876	Mrs Ruth Shields [3409]	Object
5895	Mr GRAHAM MORRIS [2131]	Object
5942	Mr Alan Tarr [1825]	Object
5985	Mr Andrew John [2264]	Object
5997	M vdh [3450]	Object
6007	Mr Jeffrey Joyce [3453]	Object
6012	Miss Cari Rees [3455]	Object
6023	Mr Phil Richardson [1858]	Object
6027	Mrs Janet Richardson [1894]	Object
6033	Mr Lewis Clements [1931]	Object
6034	Mrs Suzanne Rees [3457]	Object
6040	Mrs Claire Oneill [1537]	Object
6041	Mr Michael Hutchings [2001]	Object
6043	Mrs Claire Oneill [1537]	Object
6045	Dinas Powys Community Council (Mr Stephen Griffiths, Councillor) [3372]	Object
6053	Miss Ceri Baines [3461]	Object
6059	Mrs Joanna Williams [3459]	Object
6062	Ms Clare Richardson [2013]	Object
6063	Mr James Huzzey [3462]	Object
6067	Miss Siobhan O'Connell [2951]	Object
6075	Mr Nick Hughes [3466]	Object
6083	Mr Kevin Rossiter [3468]	Object
6085	Mrs Wendy Puntis [3467]	Object
6089	Dr Malcolm Puntis [3123]	Object
6107	Mr Julian Baines MBE [3477]	Object
6116	Mr leonard Hughes [2031]	Object
6117	Mrs Kelly Boyce [2181]	Object
6119	Mrs Allison Davies [1802]	Object
6189	Barry & Vale Friends of the Earth [708]	Object
6206	Mrs Sarah Jefferies [3494]	Object
6270	Dr Jane Harden [3506]	Object
6285	Ms Lynne Squires [3520]	Object
6292	June Davies [3523]	Object
6293	Ms Katrina Webb [3524]	Object
6297	Mrs Joanne King [3526]	Object
6299	Mr and Mrs Colin Sim [1920]	Object
6302	Mr Lawrence King [3529]	Object

6304	Dr Mandy Brimble [3530]	Object
6317	Mr John Bloodworth [3533]	Object
6320	Mrs Catherine Messr [3542]	Object
6322	Mrs Kathleen Bloodworth [2347]	Object
6324	Mr Rupert Boston [3543]	Object
6349	Miss Joanne Williams [3550]	Object
6351	Mr Charles Pleasants [3285]	Object
6354	Mr John Jones [3555]	Object
6356	Mrs Deryn Jennings [3554]	Object
6359	Mrs Helen Huzzey [1862]	Object
6365	Mr marcus longley [3382]	Support
6369	Mr Arthur Mills [1441]	Object
6371	James Leung [1754]	Object
6383	Mrs Catherine Tailby [3566]	Object
6391	Ms Deborah Jones [1521]	Object
6392	Mr Jonathan Cowpe [3568]	Object
6393	Mr Paul Dunleavy [1912]	Object
6400	Mrs Lynnette Love [1806]	Object
6402	Mrs sarah pope [1481]	Object
6413	Mr Malcolm Phillips [3574]	Object
6414	Mr Matthew Andrews [3575]	Object
6418	Mrs Christine Drury [1730]	Object
6420	Mari-Wyn Elias-Jones [3577]	Object
6422	Mrs Ella Groves [3581]	Object
6427	Ms Jen Sullivan [1564]	Object
6429	Mrs Hayley Paterson [1995]	Object
6430	Chirag Metha [2123]	Object
6441	Mrs Sweta Mehta [2120]	Object
6442	Mr Mark Hampson [3586]	Object
6446	Mrs Janet Hampson [3587]	Object
6448	Miss Fran Thrower [3588]	Object
6449	Mr Matthew Clements [1449]	Object
6451	Mrs Gabriella Thrower [3589]	Object
6454	Mrs Eleanor Hudd [3590]	Object
6455	Ms Dawn Burns [2526]	Object
6456	Ms Jodie Clements [1974]	Object
6461	Mr Justin Dowling [3216]	Object
6463	Mr Paul Griffiths [3593]	Object
6465	Elinor Elias-Jones [1938]	Object
6466	Dryw Thompson [3594]	Object
6467	Dr Claire Bennett [3595]	Object
6468	Mrs Dawn Squires [3596]	Object
6469	Mr Carl Alexis [2092]	Object
6480	Mrs Laura Hanks [1504]	Object
6481	Mrs Sian Wilton [3602]	Object
6486	John Williams [3604]	Object
6487	Mrs Catherine Clements [2088]	Object
6488	Mr Stuart Penney [3605]	Object
6506	Ursula Roan [3612]	Object

6510	Vale of Glamorgan Council Conservative Group [3614]	Object
6513	Mrs Marie-Claire Williams [3616]	Object
6527	Mr Chris Williams [1519]	Object
6530	Mr Michael Hughes [2024]	Object
6532	Councillor Christopher Franks [1024]	Object
6539	Mr Andrew Bowdler [2202]	Object
6541	MS Rhys ab owen [3629]	Object
6546	Dinas Powys Community Council (Dinas Powys Community Council) [2712]	Object
6548	Mrs Jeanette Haigh [3631]	Object
6549	Mr Tim Haigh [3633]	Object
6555	Mr Dilwyn Samuel [2155]	Object
6561	Mr Colin Asbrey [2111]	Object
6567	Mr Mark Alexander [3640]	Object
6568	Mr Neil Andrews [1726]	Object
6569	Mrs Wendy Andrews [3641]	Object
6570	Miss Chloe Barlow-Griffin [2038]	Object
6572	Mrs Anne Asbrey [3643]	Object
6574	Ms Amanda Barrington [3644]	Object
6576	Mr Mark Bernhardt [3646]	Object
6577	Mr Ian Brinsdon [3647]	Object
6579	Miss Maisie Downing [3645]	Object
6580	Mr Keble Burnell [3648]	Object
6581	Mrs Nicola Davies [1692]	Object
6589	Mr & Mrs G & H Davies [2091]	Object
6592	Helen Davies [3650]	Object
6593	Ms Dawn Burns [2526]	Object
6594	Mr Kevin Calnan [3652]	Object
6595	Mrs Lauren Davies [2213]	Object
6601	Miss Madelaine Carroll [3653]	Object
6603	Mr Geoff Davies [3654]	Object
6604	Mrs Christine Clements [2085]	Object
6605	Mr Ashley Curtis [3656]	Object
6606	Mrs Judith Coughlan [3657]	Object
6607	Mr Haydn Craven [3658]	Object
6608	Mr Eirian M Davies [3655]	Object
6609	Mrs Valerie Davidson [3659]	Object
6610	Mr Ritchie A Craven [1529]	Object
6611	Mrs Rebecca Curtis [2187]	Object
6612	Sally Craven [2216]	Object
6613	Mr David Davies [1503]	Object
6615	Mr Tudor Evans [3660]	Object
6616	Miss Sian Evans [2061]	Object
6622	Mrs Isabelle Evans [2221]	Object
6626	Friends of Seel Park (Mrs Debbie Evans, Chairman) [1397]	Object
6632	Mrs Tesni Fleetwood [3663]	Object
6633	Mr Matthew Fleetwood [3664]	Object

6655	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6687	Mrs Deborah Evans [3665]	Object
6690	Mr Aled Evans [2218]	Object
6691	Mrs Christine Drury [1730]	Object
6692	Mr Colin Drury [2215]	Object
6693	Mr Stephen Eveleigh [1539]	Object
6694	Mr Ian Harvey [3666]	Object
6695	Mr Ben Harvey [3667]	Object
6696	Mrs Jean Harrison [2969]	Object
6722	Miss Catrin Harris [3668]	Object
6734	Mr David Harris [3669]	Object
6740	Ms Sarah Forster [2046]	Object
6743	Mrs Claire Griffiths [2222]	Object
6750	Mr Tim Hubbard [3670]	Object
6751	Mrs Alison Hubbard [2863]	Object
6752	Mr Aw Holden [3671]	Object
6753	Mr Richard Hird [3202]	Object
6755	Mrs Maxine Hird [1713]	Object
6757	Mr Jeremy Herbert [3674]	Object
6758	Mrs Jill Harvey [3675]	Object
6760	Mr Paul Giles [3673]	Object
6761	Mrs Tina Giles [3676]	Object
6762	Mr Kevin Feehan [3677]	Object
6778	Persimmon Homes (East Wales) [1068]	Support
6806	Mr Fergus Jamieson [3680]	Object
6817	Miss Jenny Hurley [3681]	Object
6824	Mrs Angela Green [3683]	Object
6826	Mr Anthony Green [3684]	Object
6827	Mrs Janet Green [3685]	Object
6835	Dr John Green [3686]	Object
6836	Mrs Margaret Gwilliam [3687]	Object
6837	Mr David James [3688]	Object
6838	Mrs Joyce Harding [3689]	Object
6839	Elinor Elias-Jones [1938]	Object
6840	Mrs Beryl Kelly [3690]	Object
6841	Dr Chris Jones [2189]	Object
6842	Mr and Mrs Jones [2161]	Object
6843	Mrs Rhian Jamieson [3691]	Object
6848	Mrs Susan Pryce [3692]	Object
6854	Mr Gareth Pryce [1523]	Object
6855	Mr Charles Pleasants [3285]	Object
6857	Mrs Julie Nicholas [3693]	Object
6861	Mrs Jean Newberry [2254]	Object
6863	Mr Gavyn Meredith [3694]	Object
6864	Mr Robert Mcateer [3695]	Object
6867	Mrs Aimee Mackenzie [3696]	Object
6868	Mrs Eileen May [3697]	Object
6869	Mrs Margret Lloyd [3698]	Object

6871	Miss Helen Lloyd [3699]	Object
6872	Miss S.C Lawrence [3700]	Object
6873	Mrs Shelagh Lane [3701]	Object
6874	Mrs Dianne Lane [3702]	Object
6875	Mr Stephen Kinchen [3703]	Object
6876	Mrs Hilary Kinchen [3704]	Object
6877	Mr James Kidby [3705]	Object
6878	Mr Malcolm Phillips [3574]	Object
6879	Mrs Jill Phillips [3707]	Object
6880	Mrs Angela Peterken [1886]	Object
6881	Mr Roger Newberry [2250]	Object
6882	Miss Gemma Power [3708]	Object
6883	Mrs Sarah Pugh [3709]	Object
6884	Mrs Rachel Pugh-Alexander [3710]	Object
6885	Mr Gareth Shaw [3711]	Object
6886	Mrs Kay Shaw [2243]	Object
6888	Jane Sissons [3712]	Object
6932	Mr Jeremy Sissons [3714]	Object
6933	Miss Mary Spiller [3715]	Object
6934	Mrs E G Thomas [3716]	Object
6935	Mrs Sarah Thomas [3717]	Object
6936	Bharana Varsani [3718]	Object
6937	Mrs Anna Maria Villiers [3719]	Object
6949	Mr Dean Villiers [3720]	Object
6950	Mr Alan Virgo [3721]	Object
6951	Mrs susan virgo [2100]	Object
6952	Mr Clive Vockins [3722]	Object
6953	Mrs Wendy Vockins [3723]	Object
6954	Mrs Glenda Watts [2127]	Object
6955	Mr Antony Weeks [3724]	Object
6956	Mrs Julie Weeks [3725]	Object
6957	Mrs Kathryn Wheatley [1550]	Object
6958	Mrs J.A. Woodman [2312]	Object
6959	Mr Robin Woodman [3726]	Object
6960	Mrs Gillian Woods [3727]	Object
6961	Mr John Woods [3728]	Object
6962	Lorraine Williams [1640]	Object
6963	Mr Ivor Williams [3729]	Object
6964	Mrs Lydia Williams [3730]	Object
6973	Dwr Cymru Welsh Water: Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
6981	Mrs Pam Morris [3732]	Object
6985	Mr Maxwell Scott-Cook [3731]	Object
7013	Mr Matthew Jackson-Hookins [3733]	Object
7023	Ms Rachael Brown [3734]	Object

A total of 529 duly made representations were submitted in respect of HG1 KS2 - North of Dinas Powys off Cardiff Road, Dinas Powys, by 503 individual respondents. It should be

noted that some representors submitted more than one representation in respect of the site. Duplicate representations have only been counted once, but if representations made different points, these have been counted separately.
A total of 10 representations were received in support of the proposed site with 519 comments or objections.

In addition, two petitions were submitted. A paper petition received 377 signatures received. An online petition received 1,376 signatures. However, it should be noted that the online petition was administered through Change.org rather than through the Council's own e-petition system. A review of the location of signatories indicated that a substantial number from were not residents of the Vale of Glamorgan or adjoining authorities, including approximately one third of signatories who provided postcodes outside of Wales. Some signatories of the online petition also signed the paper petition and many also submitted individual representations on the site.

Statutory consultation responses were received from NRW and DCWW. These have been addressed first. The individual response from the site promoter is then considered.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. The issues raised in the representations from Dinas Powys Community Council have been included in the composite response as the issues raised reflect issues raised by local residents. The Community Council representation requests that either the site should be removed on mandatory policy wording and evidence requirements be incorporated. The mandatory policy wording is discussed in the final issue in the report.

The key issues raised were in respect of transport and highways, air quality, flooding, active travel and public transport, housing requirements/need, infrastructure capacity (education, health services, utilities, community facilities), biodiversity, green wedge, loss of agricultural land and landscape impact. A full response on each issue has been provided.

It is noted that a number of background documents for each Key Site were made available as part of the consultation and where relevant the Council's response to representation makes reference to this evidence.

STATUTORY CONSULTEE RESPONSES

6793 - Dwr Cymru Welsh Water (DCWW)

DCWW have reconfirmed that a hydraulic modelling assessment will be required in order confirm capacity and connection points to the existing public sewerage system and have further advised that:

- The site is crossed by an 18-inch diameter watermain.
- The sewerage network can accommodate foul flows from the development.
- The site is crossed by a 1450mm diameter foul sewer; and

- The Cog Moors WwTW has sufficient capacity to accept foul flows from the proposed development.

Council Response

DCWW's comments are noted. The need for a hydraulic modelling assessment and references to site specific constraints due to infrastructure crossing the site have previously been stipulated through earlier engagement with statutory undertakers as part of the plan preparation process. As a result, they have already been included in the supporting text for KS2 and also within the Infrastructure Delivery Plan (Appendix 2 of the RLDP).

6655 - Natural Resources Wales (NRW)

NRW 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.

Council Response

The comments are noted. The requirement for species specific surveys is a matter for planning application stage and the Appendix 2 of the RLDP highlights this as a requirement.

A Masterplan has been prepared for each of the key sites to demonstrate the key placemaking and design principles that would apply to each site. Each high-level plan is referenced as 'indicative,' rather than being a detailed site layout. However, it does set out key parameters including which parts of the site are likely to accommodate built development and which are open space and green infrastructure corridors, which will also include areas required to achieve net biodiversity benefit.

In the case of KS2, the masterplan has been informed by a Preliminary Ecological Appraisal, which largely retains key biodiversity corridors including broadleaved woodland and native species rich hedgerows in line with the stepwise approach. It is recognised that at detailed design stage there may be a need for the masterplans to be amended in light of updated ecology surveys and the high-level nature of these plans does allow for a degree of flexibility to provide an appropriate response from a biodiversity perspective.

7035 - Natural Resources Wales (NRW)

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.

Council response

The key points raised as part of the October 2023 consultation response from NRW were:

- The site is within 2km of the Cwm Cydfin, Leckwith SSSI.
- The minor watercourses form a hydrological link with Cog Moors and the Severn Estuary Marine Sites.
- The site includes priority semi natural grassland habitats bordered by ancient semi natural woodland and is a key site for connectivity between SSSIs in the wider area.
- There is a need for at least 10m buffer to protect the riverine habitat across the site.
- Because of the wet nature of the site pollution prevention measures would need to be implemented.
- No works should be proposed within the fluvial floodplain.
- Works within 8m if the Main River (East Brook) would require a Flood Risk Activity Permit.
- NRW are aware of numerous European Protected Species (EPS) records for the proposed site, including great crested newts and bats. Otters are likely to be present on any watercourses within or adjacent to the site, therefore their presence should be assumed. We therefore advise that any application that comes forward for this site should be supported by up-to-date ecological survey information, to include relevant protected species surveys as appropriate as appropriate and appropriate mitigation/compensation.
- The full survey requirements should be determined in liaison with the Local Authority Ecologist. Where species are present, development should retain and enhance supporting habitats and include appropriately sized buffers to watercourses and retained habitat features.

The comments from October 2023 related to a larger candidate site (referenced 440) rather than the smaller site that was revised through the RLDP process. Notwithstanding this, NRW's comments have been considered in respect of revisions to the layout.

With regards to survey requirements and protected species, an additional bullet point on planning applications is proposed to be included in the introductory section of Appendix 2 which highlights the need for up to date surveys. This is set out in the response to representation 6653 by NRW.

With regards to landscape fragmentation and potential severance by road infrastructure, the Green Infrastructure Statement sets out the opportunity to enhance green infrastructure on the site and provide connections to adjacent and nearby GI assets and to create new green infrastructure and habitats which will function as continuous movement routes for wildlife and to minimise fragmentation. The Council acknowledge that the initial internal road network identified will require further refinement as part of future detailed design. The Council will continue to engage with NRW in development of the masterplanning of the site to ensure appropriate biodiversity mitigation and enhancement measures are integrated within the site.

INDIVIDUAL RESPONSES

6778 - Persimmon Homes (Boyer Planning)

Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.

The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision.

The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidence base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.

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

In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network.

Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel.

Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.

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

Council Response

Support is noted.

COMPOSITE RESPONSE

SUPPORT

- The development site would provide a mix of housing types and tenures and deliver much needed housing in the Dinas Powys and Llandough area.
- The site is an obvious location for housing with good existing transport links and near existing healthcare, education and public transport networks.
- It will enable younger people from older estates within Dinas Powys to remain in the local area.
- The housing will help sustain the local community.
- Support for the housing but ensure that other services and facilities are provided.

A representation of support was also submitted by the site promoter, Persimmon Homes, which is detailed in the individual response section above.

Council Response

Support is welcomed and the comments are noted.

COMMENTS AND OBJECTIONS

Issue – Transport and highways

- Existing congestion and network stress – Dinas Powys suffers from chronic congestion along its main arterial route caused by junction capacity constraints – key junctions in

and around Dinas Powys are at or near capacity including Merrie Harrier, Cardiff Road / Penlan Road and Cardiff Road / Millbrook Road.

- Lack of evidence including robust traffic modelling and any deliverable mitigation measures.
- Concerns that an additional 250 houses (potentially 300-500 additional cars) would add to existing congestion issues and increase journey times.
- No proposals for Dinas Powys By-Pass.
- Impact on emergency services caused by increased congestion.
- Concerns over proposed sites access, new junction onto an already congested road, proximity to already congested junctions.

Council Response

HG1 KS2 Land to the North of Dinas Powys is allocated in the Deposit RLDP for 250 dwellings. The proposed allocation will generate additional traffic movement, and the Council has therefore assessed its transport implications comprehensively through the RLDP evidence base.

In considering the traffic implications associated with the Key Site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of collective development proposals on the strategic transport network and to identify mitigation measures where necessary. The STA is supplemented by site-specific transport evidence submitted in support of relevant sites. The full STA assessment is set out in Background Paper BP14 Strategic Transport Assessment - Stage 1 and BP14A Strategic Transport Assessment - Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a review of baseline transport conditions in the Vale of Glamorgan and examines the existing transport infrastructure and its current operational state, including the strategic highway network. The Stage 2 STA comprises a series of technical notes covering Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation, and Cost Estimation and Funding Mechanisms.

The STA uses the Transport for Wales South East Wales Transport Model (SEWTM) as the strategic modelling basis, supplemented by industry-standard detailed junction modelling software (TRL Junctions 11 and JCT LinSig). The strategic model covers the Cardiff Capital Region and provides a recognised basis for assessing the cumulative impacts of strategic housing allocations on the strategic highway network. The assessment considers two principal forecast scenarios:

- 2036 Base Scenario - representing future background traffic growth to 2036, excluding traffic from the RLDP strategic housing sites.

- 2036 RLDP Scenario - representing the 2036 Base scenario plus traffic associated with the identified RLDP strategic housing sites.

The 2036 Base Scenario includes forecast background traffic growth derived from TEMPro/NTEM, which takes account of wider changes in population, households, employment, car ownership and economic activity. This means that forecast job growth, regional housing growth and general traffic trends within the Vale of Glamorgan and the wider South East Wales region is accounted for within the strategic assessment. The 2036 RLDP Scenario then adds the traffic associated with the strategic housing allocations, allowing the specific cumulative impact of those housing sites to be identified against a future-year baseline that already reflects wider background growth that would occur regardless of the strategic housing allocations. The traffic data and modelling approach used in the STA are standard techniques and are appropriate and proportionate for plan-making.

Technical Note 5 of the STA provides a detailed assessment of the forecast cumulative impact of the proposed RLDP housing allocations on 17 highway network junctions. The junctions closest to HG1 KS2 include Junction 8 Cardiff Road/Murch Road/Millbrook Road, Junction 9 Penlan Road/Barry Road/Andrew Road/Cardiff Road and Cardiff Road/Redlands Road (Merrie Harrier), Junction 10 A4055 Penarth Road/Cogan Spur/Windsor Road/Barry Road (Barons Court), and Junction 12 Leckwith Road/Pen-y-Turnpike Road.

Junction 8 was not taken forward for detailed strategic mitigation assessment due to the low forecast impact. Site-specific effects at this location can be considered further through the planning application process, where necessary.

For Junctions 9 and 10, Merrie Harrier and Barons Court, the STA recognises that these are existing congestion locations. Technical Note 6 identifies that both junctions are forecast to operate over capacity in the 2036 Base scenario, before the addition of RLDP strategic housing traffic. When the cumulative impact of the RLDP sites is added, both junctions remain significantly over capacity. The STA concludes that no strategic highway mitigation is required at these junctions as part of the RLDP, because large-scale localised highway mitigation would be disproportionate to the additional impact arising from the RLDP strategic housing allocations. The STA identifies that the strategic focus for these locations should be on wider sustainable transport network improvements, which would require regional support and coordination.

Whilst existing peak-hour congestion at Merrie Harrier and Barons Court is acknowledged, HG1 KS2 also has clear locational benefits. The site is well placed in relation to local facilities and amenities within Dinas Powys, including schools, shops, healthcare, bus stops and Eastbrook railway station. It also provides access to wider regional destinations including Barry, Penarth and Cardiff by a range of transport modes. The allocation is therefore considered to benefit from a sustainable location, subject to the detailed access, active travel, public transport and highway mitigation matters being addressed through the planning application process.

With regards to Junction 12, Leckwith Road/Pen-y-Turnpike Road, the STA identifies this location as being sensitive to traffic growth arising from the RLDP strategic housing allocations and its role in accommodating traffic to and from Cardiff within the 2036 RLDP scenario. Technical Note 7 identifies that mitigation is required at this junction because it is

forecast to operate significantly over capacity and there is a material RLDP impact on overall junction delay.

For junctions where mitigation is identified as appropriate, the STA considers feasibility designs which have been prepared to demonstrate that mitigation is achievable and can restore operation to better, or similar to, 2036 Base levels. While further design stages will be necessary, the feasibility designs are proportionate to the requirements of the RLDP and demonstrate that a scheme is viable to a reasonable degree of certainty. In respect of Junction 12, the potential mitigation is to convert the existing priority junction into a signalised junction with MOVA control. Signals would regulate flows and allocate green time more equitably across arms. The feasibility design also includes advanced cycle stop lines on all approaches.

The Deposit Plan clearly sets out the requirement for each relevant site to contribute towards mitigating the impacts of development, where justified. Technical Note 8 sets out an indicative cost estimate and apportionment methodology for relevant strategic highway improvements. Any contributions would be secured through Section 106 planning obligations at planning application stage and would need to meet the statutory tests, namely that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

In respect of site access for HG1 KS2, access is proposed to be taken from Cardiff Road. The Deposit Plan identifies the need for a new signalised junction onto the A4055 Cardiff Road to serve as the primary access, with a secondary access for emergency vehicles, pedestrians and cyclists. The Deposit Plan also identifies the need for walking and cycling links between the development and Seel Park and George's Row, together with contributions towards off-site sustainable transport measures in the area.

The promoter has submitted transport evidence which has considered access from Cardiff Road. Some earlier submissions considered a larger development quantum than is now proposed through the Deposit RLDP and should therefore be read in that context. However, the later access work tested a 300-dwelling scenario, which is above the 250 dwellings now allocated at HG1 KS2. This provides a conservative indication that a suitable access arrangement can be achieved in principle.

The promoter's access evidence identifies two potential signalised access options from Cardiff Road. Option 1 comprises a signalised junction located at the northern boundary of the land within ownership of the applicant. Option 2 comprises a signalised junction with a 26-metre dedicated right-turn lane, utilising part of the existing bus lane on the western side of Cardiff Road, with the bus lane reinstated to the north of the proposed junction. Both options are shown by the promoter as being capable of accommodating the required signal infrastructure within the highway boundary, and both include a staggered pedestrian crossing of the access arm.

Junction modelling of the potential access arrangements has been undertaken by the site promoter assuming that 300 dwellings are served by the junction. This demonstrates that both options would be expected to operate with spare capacity, with queuing and delays

remaining limited on all arms and queuing traffic expected to clear the junction within a single cycle. Option 2 provides a slight increase in spare capacity in the morning peak and a more substantial increase in capacity in the evening peak. A high-level technical review undertaken on behalf of the Council found that both site access options were shown in the promoter's modelling to operate within acceptable capacity thresholds on the basis of 300 dwellings, and that the trip distribution and assignment methodology was standard practice and reasonable. This has been further confirmed by Council Highway Officers. This supports the conclusion that a suitable access can be provided in principle, subject to detailed assessment at planning application stage.

The submitted site-specific technical reports recognise that the Cardiff Road corridor experiences queuing and delay during peak periods. However, the promoter's modelling indicates that queues from Merrie Harrier would not extend back to the proposed site access in the modelled scenario.

Welsh Government transport policy places clear emphasis on reducing the need to travel, supporting modal shift, and applying the sustainable transport hierarchy. This means that walking, cycling and public transport should be prioritised before private car movement, with highway capacity measures considered where they are necessary and proportionate. The proposed allocation is therefore not assessed solely on the basis of private car access, but also on its ability to connect to existing public transport, local services and active travel routes.

The promoter's evidence identifies that the site is located close to existing public transport and active travel opportunities. Eastbrook railway station and local bus stops are within walking distance of the site, and the site is capable of connecting to the existing pedestrian and cycle network. The submitted evidence identifies potential pedestrian links to Highfield Close and George's Row, which would help connect the site to Dinas Powys and provide access to local services, public transport and schools. The detailed form and acceptability of these connections will be determined through the planning application process.

In relation to the suggestion that a Dinas Powys bypass should be included in the RLDP, the Council does not consider that this would be appropriate. Although a bypass proposal formed part of a previous development plan, it does not form part of the adopted Local Development Plan 2011-2026. While a bypass could potentially address some through-traffic movements, it would not directly resolve the primary congestion constraints at Merrie Harrier and Barons Court, which are the principal capacity issues identified in the transport evidence.

Since the earlier bypass proposal was identified, national transport policy in Wales has changed significantly. Welsh Government policy now places greater emphasis on reducing car dependency, supporting modal shift, improving active travel and public transport, and ensuring that new highway infrastructure is only taken forward where it is necessary, proportionate and consistent with wider climate change and sustainable transport objectives.

A requirement for HG1 KS2, or other RLDP allocations, to deliver or fund a Dinas Powys bypass would not be justified on the evidence currently available and would be difficult to reconcile with the statutory tests for planning obligations. Any Section 106 obligation must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. Given the scale of the HG1 KS2 allocation, its assessed traffic impact, and the wider strategic nature and cost of a bypass, it is unlikely that a requirement to deliver or fund such a scheme could satisfy those tests. The inclusion of a Dinas Powys bypass in the RLDP is therefore not considered appropriate.

At planning application stage, there will be a requirement for an updated Transport Assessment and detailed designs for both the site access and any required off-site highway, active travel and sustainable transport improvements. The level of detail included in the RLDP and supporting documents is sufficient to demonstrate that, in principle, HG1 KS2 Land to the North of Dinas Powys is deliverable in transport terms and that appropriate access and any necessary mitigation can be secured through the planning application process.

Concerns have been raised about potential delays for emergency services due to increased congestion on the local highway network. Proposed RLDP key site allocations have been subject to a comprehensive evidence-based assessments, including transport and accessibility considerations. This includes the preparation of a Strategic Transport Assessment (as set out above) which evaluates the cumulative impact of development across the Vale of Glamorgan road network, including key routes serving Dinas Powys. Where necessary, mitigation measures have been identified to ensure that the highway network continues to operate safely and effectively. Any future planning applications on RLDP sites will be required to be supported by detailed Transport Assessments. These assessments must demonstrate that safe and suitable access can be achieved for all users, including emergency service vehicles. Developers will also be required to design layouts in accordance with relevant standards and guidance, including those relating to emergency access, road widths, turning facilities and junction capacity. It should be noted that in preparing the RLDP, the Council consults closely with statutory consultees, including the Highways Authority, South Wales Fire and Rescue Service, Welsh Ambulance Services NHS Trust, and South Wales Police, providing the opportunity for these agencies to raise any operational concerns, including those relating to access and response times, and to require mitigation where appropriate. No objections have been received. The Council therefore considers that the proposed allocation HG1 KS2 North of Dinas Powys does not give rise to unacceptable risks in relation to congestion affecting emergency services vehicles.

The detailed response provided above on the Strategic Transport Assessment (STA) illustrates the steps that have been taken to assess the likely impacts of RLDP key site allocation on traffic movements within the Vale of Glamorgan. The STA notes that in the baseline scenario, the primary junctions causing congestion within Dinas Powys are already over capacity during the AM and PM peak regardless of RLDP strategic housing traffic. The inclusion of additional strategic housing allocations through the RLDP does not materially affect this position. Overall, the STA demonstrates that the proposed strategic housing growth can be accommodated within the existing and planned transport networks, provided

continued progress is made towards sustainable travel and effective integration of land use and transport planning principles. It should also be noted that the STA analysis is based on a highway-only strategic model and does not explicitly capture the effects of modal shift, peak spreading or increased levels of home working. These behavioural and policy-driven factors, together with regional interventions such as the South Wales Metro and Active Travel initiatives, are expected to further moderate highway demand.

Issue – Air Quality

- Concerns about air quality linked to congestion particularly near Dinas Powys Infants School.

Council response

In respect of air quality, pollutants of concern for public health are particulate matter (PM10, PM2.5) and primary/secondary derived nitrogen dioxide (NO2). Both pollutants primarily originate from motor vehicles. The Council's Shared Regulatory Services (SRS) monitor multiple sites for these pollutants throughout the Vale of Glamorgan including within Dinas Powys. The latest Vale of Glamorgan Council 2025 Air Quality Progress Report (September 2025) indicates that the baseline air quality within the Vale of Glamorgan is generally good. There are currently no Air Quality Management Areas (AQMAs) within the Vale of Glamorgan and air pollution concentrations continue to meet the relevant Air Quality Objective limits. Air Quality Management Areas (AQMAs) are declared when air quality is close to or above an acceptable level of pollution (known as the air quality objective). After declaring an AQMA the authority must prepare an Air Quality Action Plan (AQAP) within 18 months setting out measures it intends to put in place to improve air quality to at least the air quality objectives, if not even better. AQMA(s) are seen by local authorities as the focal points to channel resources into the most pressing areas of pollution as a priority.

Specifically, within Dinas Powys and Penarth, multiple monitoring sites are located along Cardiff Road and at Merrie Harrier and Cogan junctions, and while there were a small number of pollution episodes and exceedances over the monitoring period in the short-term objective limit of >50µg/m3 for PM10 during bonfire night on the 5th of November and the surrounding dates. These exceedances were still within the short-term objective limit of 50µg/m3 not to be exceeded more than 35 times a year. Meteorological conditions during this period may have prevented effective dispersion of particulate matter generated by fireworks and associated activities.

In respect of the RLDP, SRS will continue to assess air quality impacts associated with the RLDP and Air Quality Assessments will be carried out where necessary and mitigation measures recommended to ensure that the air quality impacts of new developments will not cause any adverse effects to new and existing residents. Further, SRS on behalf of the Vale of Glamorgan Council review all planning applications regarding air quality in line with local and national planning policy.

In addition to the above, while direct air quality management is critical in maintaining environmental quality, national and local planning policy place a strong emphasis on sustainable transport and reducing reliance on the private car. The location of key site HG1 KS2 adjacent to an existing settlement with access to public transport (both bus and rail), access to local services and facilities provide opportunities to promote more sustainable travel patterns. Measures such as active travel connections, public transport enhancements, and travel planning would be expected to form part of any development proposal, thereby helping to minimise additional traffic generation and associated emissions.

Considering the above, the Council considers that the allocation of key site HG1 KS2 North of Dinas Powys is consistent with national planning policy and that any potential air quality impacts can be appropriately assessed and mitigated through the development management process.

Issue – Flood Risk, Drainage and Hydrology

- The site lies within a hydrologically sensitive catchment of the East Brook and River Cadoxton, with extensive evidence of historic flooding, including major flooding events (notably December 2020 (which has been omitted from the flooding assessment)) and the site is subject to extensive flooding especially during the winter months.
- The RLDP relies on outdated Natural Resources Wales evidence which does not reflect the scale or implications of the December 2020 flood event.
- More houses would increase flood risk in Dinas Powys, and the loss of green field land would increase surface water runoff.
- The RLDP does not include a requirement for detailed catchment wide modelling.
- The RLDP fails to demonstrate that adequate, deliverable and fully funded drainage and flood mitigation infrastructure can be secured to address known issues which is against the requirements of Planning Policy Wales and TAN15.
- Ground conditions described as waterlogged, with high groundwater tables and poor permeability which would mean that SuDS may be unworkable.
- Downstream communities (Cardiff Road, Georges Row, Sunnycroft, Millbrook) face heightened flood risk

Council Response

The Council notes and accept the comments in respect of the hydrological sensitivity of the Dinas Powys area around the sensitive catchment of the East Brook and Cadoxton Rivers and the information that the land forming the HG1 KS2 North of Dinas Powys site is subject to extensive flooding during the winter months.

However, it should be noted that in progressing the key site HG1 KS2 North of Dinas Powys in the Deposit RLDP, the site has been supported by a range of evidence including a Preliminary Flood Risk Assessment and Drainage Strategy prepared by specialist environmental consultants with wide ranging local knowledge, JBA Consulting. The preliminary report found that flood risk throughout the HG1 KS2 North of Dinas Powys site is generally very low, however the report did recommend that more detailed flood modelling is undertaken, whilst stressing that due to the naturally oversized channels

throughout the site it is unlikely that flood risk will increase with a more detailed assessment. Further information is available within the range of Council RLDP background evidence including BP21 Strategic Flood Consequences Assessment and BP21A Flooding and other related evidence such as the Section 19 Flood Report into the December 2020 flooding within Dinas Powys.

Therefore, while accepting the general comments in respect of the site's location within the hydrologically sensitive catchment of the East Brook and River Cadoxton, and the evidence of historic flooding, the Council considers that the information presented in support of the RLDP in general and the key site adequately address the sensitivity of the general area and that this information represents the best available data at the strategic plan level and is a proportionate scale of evidence for the RLDP and the suggestion by representors that RLDP the evidence base is outdated is not accepted.

Concerns have been expressed over the suitability of the evidence supporting the RLDP, specifically representations consider that information available from Natural Resources Wales (NRW) is outdated and no longer reliable as they do not reflect either the scale or the implications of the December 2020 flood event.

NRW is the national body responsible for the strategic management of flood risk in Wales, including flooding from main rivers, the sea and reservoirs. It produces and maintains the primary evidence base for flood risk (including mapping and modelling), and acts as a statutory consultee in the planning system, providing technical advice to local planning authorities and developers. The responsibility for the availability and updating of national flood modelling data sits with NRW.

While the Council acknowledges the representations that suggest that flood risk datasets underpinning the RLDP are not sufficiently up to date and omit more recent flood events, the Council does not agree with this position. The RLDP has been informed by nationally recognised and authoritative flood risk datasets produced by the relevant statutory body responsible for flood risk management. They provide a consistent and standardised evidence base that has been subject to rigorous assessment and quality assurance processes. The Council therefore considers that the evidence base that supports the RLDP provides a strategic, high-level overview of flood risk that is robust, proportionate and consistent with national policy. More detailed site-specific flood assessments will be a statutory requirement at the planning application stage, as referenced in Appendix 2 of the Deposit Plan, and any limitations in the strategic flood data will need to be appropriately addressed at that time.

Regarding the December 2020 flood event, the Council acknowledges that the December 2020 flood event was a significant incident within the Dinas Powys catchment, resulting in impacts to properties and infrastructure. However, it is important to distinguish between the strategic role of the Replacement Local Development Plan (RLDP) and the site-specific role of flood risk assessments at the development management stage. The RLDP is supported by a Strategic Flood Consequence Assessments (SFCA) prepared by specialist environmental consultants and utilises flood mapping and datasets provided by NRW and is further supported by site specific technical work as detailed above.

While representations have been raised stating that the RLDP "does not include any analysis of the December 2020 event", the 2020 event occurred within a known flood-prone catchment, which is already reflected in NRW flood mapping and SFCA outputs. The event is referenced in supporting material (including strategic flood evidence and NRW investigations), even where not explicitly reproduced as a standalone assessment within the RLDP. Importantly, the Section 19 Flood Investigation Report (2021) and related NRW work post-event form part of the wider understanding of flooding within the area, even if their detailed findings are not replicated within plan documents. The Council therefore considers that while the December 2020 flood event is recognised as an important consideration, the RLDP has relied upon strategic, nationally recognised datasets and NRW guidance and the lack of detail regarding the December 2020 flood event does not undermine the robustness of the information and reinforces the need at detailed planning application stage for a robust site-specific assessment.

It should be noted that in response to some of the criticisms raised with regards to flooding at the key site HG1 KS2 North of Dinas Powys, for clarity, the Council has instructed the specialist environmental consultants, JBA Consulting, to respond and update the evidence base where appropriate and an Addendum to the SFCA has been prepared to clarify this point. This highlights that the December 2020 flooding was referenced in the SFCA. However, it was incorrectly named in the report as Storm Dennis. Storm Dennis actually occurred in February 2020, where the flood event of 23rd December 2020, was as a result of an unnamed storm with a period of short intense rainfall. The flood event itself was therefore referenced, albeit with an incorrect name.

The Stage 1 SFCA also included a map showing historical flooding extents, derived from the NRW Recorded Flood Extent dataset. At the time that the SFCA was prepared, the December 2020 flood was not shown on the map, although earlier Dinas Powys flood were. Following receipt of the consultation comments, the relevant NRW dataset was reviewed again. At the time of writing the addendum, the extent of the December 2020 flooding in Dinas Powys is still not comprehensively captured within the currently available NRW Recorded Flood Extent mapping. For that reason, the Stage 1 SFCA mapping has not been redrawn by JBA. Instead, this addendum clarifies the limitation of the mapping and signposts to the more detailed evidence available within the Section 19 flood investigation report for Dinas Powys, which records flood extents for Brookside, Mill Road, Greenfield Avenue, Elm Grove Place and St Cadoc's Avenue.

Representations also raises concerns regarding the potential for increased surface water flooding arising from the allocation of approximately 250 dwellings in an area identified as being susceptible to such risk.

All new development in Wales must comply with national planning policy and statutory Sustainable Drainage Systems (SuDS) requirements. National planning policy in Wales, including Planning Policy Wales (PPW) and Technical Advice Note 15 (TAN 15): Development, Flooding and Coastal Erosion, requires that development is directed away from areas at highest risk of flooding and that flood consequences are fully understood and

managed. Where surface water flood risk is identified, proposals must be supported by a Flood Consequence Assessment (FCA) demonstrating that risks can be acceptably managed.

Mitigation measures typically include attenuation basins, swales, permeable surfacing, and other forms of green infrastructure designed to control both the rate and volume of runoff. These measures must be approved by the Council in its role as the SuDS Approval Body (SAB). The SAB process ensures that surface water runoff from new development does not exceed greenfield runoff rates, is managed as close to source as practicable and does not increase flood risk on-site or elsewhere. These measures are secured through the SAB approval process and planning conditions and are subject to detailed technical scrutiny.

Consultants JBA acting for the site proposer have confirmed the site shall attenuate surface water to greenfield runoff rates of approximately 11.4 l/s/ha. This aims to mimic natural site processes whilst the development will also incorporate a design that seeks to intercept the first 5mm of rainfall from impermeable areas.

It is also recognised that, where existing surface water flooding issues are present, well-designed SuDS schemes can provide betterment by reducing current runoff rates and improving overall drainage performance within the catchment.

Therefore, while the Council acknowledges the concerns raised in the representations, it is not considered that the proposed level of development would result in an increase in flood risk, subject to compliance with the established policy and regulatory framework and is appropriately designed and manged.

Representations also raise concerns that catchment wide flood modelling should be undertaken before any future development can be considered.

In preparing an RLDP, flood requirements are set out in Planning Policy Wales (Edition 12 February 2024), Technical Advice Note 15: Development, Flooding and Coastal Erosion and supporting information and guidance from Natural Resources Wales (NRW). At the Deposit Plan stage, the expectation of national policy is that flood risk is strategically assessed via Strategic Flood Consequence Assessment and analysis of Natural Resources Wales data and that such assessments are proportionate and sufficiently robust to justify allocations and demonstrate that sites are deliverable and fundamentally acceptable in flood terms. Catchment wide modelling is not a requirement at the RLDP allocation stage.

More detailed flood risk assessment would be required in support of future planning applications, and these would include (where necessary) site-specific Flood Consequence Assessment (FCA), Sustainable Urban Drainage approval Body process and consultation with Natural Resources Wales.

Therefore, while the comments in respect of detailed catchment wide modelling are noted, the Council considers that the background evidence prepared in support of the key site HG1 KS2 North of Dinas Powys is appropriate at this stage of the RLDP process and complies with national policy as detailed in Planning Policy Wales (Edition 12 February 2024), Technical Advice Note 15: Development, Flooding and Coastal Erosion.

Representations raise concerns that existing ground conditions at the site, mean it is waterlogged, there is a high groundwater table and poor permeability and therefore SuDS may be unworkable.

While the comments are noted, in Wales, SuDS are mandatory for all new development comprising more than one dwelling or where the construction area exceeds 100 m^2, under Schedule 3 of the Flood and Water Management Act 2010 (commenced January 2019). The provision of SuDS will ensure that surface water run off rates from the site would remain the same or be better than the existing situation. Approval for schemes must be obtained from the SuDS Approval Body (SAB) prior to construction, ensuring that surface water runoff is managed in accordance with national standards.

While the constraints highlighted in the representation may restrict the type of SuDS features that could be utilised, there is no evidence to suggest that appropriately designed SuDS cannot be an effective means of managing surface water runoff from the site.

National policy requires that surface water is managed through an appropriate hierarchy of drainage measures, informed by site conditions and supported by detailed design. In this context, SuDS are expected to form part of a broader surface water management strategy, incorporating a combination of attenuation, surface conveyance, controlled discharge and downstream mitigation where necessary, rather than relying solely on infiltration. The precise nature, scale and effectiveness of these measures would be determined at the detailed design stage associated with any future planning application and would be ultimately determined following site-specific ground investigations; hydraulic modelling; engagement with the SuDS Approval Body (SAB) and relevant flood risk authorities; and secured through long-term management and maintenance arrangements.

Planning Policy Wales (PPW) (Edition 12 February 2024) is clear that where infiltration SuDS may not be appropriate, consultation with drainage bodies and Natural Resources Wales (NRW) should be undertaken and relevant evidence and information drawn from Area Statements considered (paragraph 6.6.27 refers).

The allocation of the site therefore does not imply that SuDS in isolation will resolve all surface water issues. Rather, it reflects the understanding that mitigation will need to be comprehensive, multi-layered and potentially phased, with some measures delivered in advance of or alongside development. In this regard, the Preliminary FCA submitted in support of the site identifies that underlying soil conditions and geology in the area there is unlikely to be the potential for the development site to infiltrate to the ground (subject to further infiltration testing) and suggest that as the site is crossed by a number of watercourses it is preferable to discharge surface water into these watercourses. The Preliminary FCA also suggests that SuDS features across the site could include swales, basins, rain gardens and other cross contour features to convey surface water into the drainage channels.

Further, existing watercourses will be protected by appropriate buffer zones within which no development will be permitted as required by NRW. This will further assist on site surface water management through maintaining natural overland flow routes.

The Council therefore disagrees that there are limitations to the effectiveness of SuDS but accepts that the design and implementation of SuDS should be based on a detailed assessment and understanding of the hydrological features of the proposed site, and which will need to support any future planning application.

In Wales, Planning Policy Wales (PPW) and TAN 15 (Development and Flood Risk) set out the planning requirements for flooding. They sit alongside SuDS legislation and inter alia, direct that development should seek to reduce and not exacerbate flooding both on and off site. In this regard, future development of the site would be subject to a site-specific Flood Consequences Assessment (FCA).

A typical site-specific FCA would cover elements such as existing flood risk sources e.eg. rivers, surface water, flood levels, depths and extent, impact of climate change and the possible effects of the development on flooding elsewhere around the site. The FCA would then propose appropriate mitigation measures to address any issues identified. A critical part of an FCA is demonstrating no increase in flood risk elsewhere around the site through displacing floodwater onto neighbouring land or impeding natural flow routes. An FCA at planning application stage would therefore ensure that flood processes across the area are properly understood and that the proposed development site is not being treated in isolation. Measures such as SuDS as described above would be utilised to retain and identified flooding within the site.

The Council therefore considers that the requirements of national planning and local policy adequately address the concerns expressed in the representation in regard to the potential flooding of downstream communities (Cardiff Road, Georges Row, Sunnycroft, Millbrook refer) and that such matters would be appropriately considered through the requirements of an FCA at the planning application stage.

Issue – Poor Active Travel and Public Transport

- Concerns that public transport does not meet every day needs and is not a realistic alternative to private transport for the development given the limitations of the bus and rail services. Eastbrook station is overcrowded at peak times and has limited car parking, and no disabled/elderly access (Barry bound trains) and bus services are infrequent and unreliable. As a consequence, residents will remain car dependent.
- Concerns over the reliance of public transport and active travel to mitigate perceived transport impacts of the proposed development given the limitations presented by existing network pressures, topography and local highway infrastructure e.g. footways.
- No credible proposals to improve the situation and enhance services.
- Objections to proposed active travel routes, specifically Georges Row, which is identified as a private lane.
- Active Travel (Wales) Act 2013 – the key site HG1 KS2 North of Dinas Powys does not comply with the requirements of the Active Travel (Wales) Act 2013.

Council Response

The Council acknowledges the concerns raised in respect of public transport and would comment as follows.

Dinas Powys is served by two rail stations at Eastbrook and Dinas Powys. The stations offer direct routes to Cardiff, Barry and Bridgend (and further afield) with regular services of 4 trains per hour in each direction. The two stations are well located at either end of Dinas Powys, and most of the village is within a 15-minute walk of either one or both stations and almost all the village is within a 20-minute walk of either or both stations (BP18 Transport for Wales Isochrone Maps). In addition to the rail services, Dinas Powys is served by a local bus network with 4 services linking it to Cardiff, Penarth, Barry and the wider Vale of Glamorgan. The main operators are Cardiff Bus (Services 93, 95, 305) and First Cymru (Service 304). While the frequency of the services varies, there are 2-4 buses per hour towards Cardiff and 2 buses per hour towards Barry/Vale however it is accepted that these frequencies reduce during evenings and at the weekends.

The Council therefore considers that while individual bus routes may operate at moderate frequencies, the combined rail and bus public transport network serving Dinas Powys provides regular and reliable access to a wide range of key destinations including Cardiff, Barry, Penarth, Cardiff Bay and Llandough hospital and is therefore appropriate for the everyday needs of local residents. With specific regard to the proposed development site HG1 KS2 North of Dinas Powys, it is acknowledged that not all residents will be willing or able to walk or cycle to the local station(s) or to access bus services or to other services and facilities within Dinas Powys and the RLDP does not mandate that future residents of the site should only travel by sustainable modes. However, the site is located in a part of the Vale of Glamorgan where sustainable transport modes do offer alternatives should residents choose to utilise them, and even where car borne journeys are deemed to be necessary, the proximity of the site to a range of services and facilities mean that journey distances would be reduced.

The Council therefore considers that the proposed development site is in a sustainable location. Its proximity to established public transport infrastructure, including accessible rail stations and regular bus services, as well as other local services and facilities, provides genuine opportunities for modal shift away from private car use. PPW 12 emphasises the need to locate development where sustainable transport options are available or can be enhanced, and to reduce the need to travel by private vehicle. In this context, the site's integration with the existing settlement and its connectivity to public transport corridors ensures it aligns with national policy objectives to promote sustainable travel patterns, support active travel, and contribute to the creation of more sustainable, low-carbon communities.

Concerns have been raised over the level of disabled access currently available at Eastbrook station and how this severely limits use for some section of the community e.g. disabled, elderly or those with pushchairs. Eastbrook station is currently categorised under the National Rail 'step-free access' categories classification system used by Network Rail, Train

Operating Companies (including Transport for Wales), as category B2. This means that in practise, there is step-free access to both platforms, but with significant limitations. For Platform 1 (to Cardiff), access is via a footpath from Cardiff Road and a ramp and for Platform 2 (to Barry), access is via Chamberlain Row and a ramp. A footbridge with steps connects the platforms (no step-free route between them internally). Access to Platform 2 for those unable to use the footbridge would involve a significant detour.

Therefore, while the Council acknowledges the issues set out above, the Council's primary responsibility at Eastbrook Station covers the highway access and the Park and Ride facility. Responsibility for ensuring appropriate disabled access at railway stations rests with Network Rail, as infrastructure owner, and Transport for Wales as the train operating body responsible for day-to-day management and customer service. These organisations are responsible for maintaining existing accessibility provision and delivering improvements, typically through national programmes such as "Access for All" or their own investment plans. The Local Planning Authority (LPA) has a more limited role, focused on considering accessibility in strategic planning terms and ensuring new development promotes sustainable and inclusive transport, but it does not control or fund upgrades to existing rail infrastructure. Accordingly, any future enhancements to station accessibility would fall to Network Rail and/or Transport for Wales, rather than the LPA.

In addition to the existing provision set out above, Transport for Wales is committed to improvements on the Vale of Glamorgan line which is identified as part of a 'priority corridor' within the Metro programme, with committed timetable enhancements. Improvements will include service frequency enhancements (particularly on the Barry corridor), upgraded rolling stock, increased capacity, and enhanced station accessibility and facilities and these improvements will further enhance rail provision within Dinas Powys.

Concerns over the reliance of sustainable and active travel to mitigate perceived issues arising from key site HG1 KS2 North of Dinas Powys are noted however, national policy directs that new development in Wales should be located and designed in a way which minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, local services and community facilities. The RLDP adopts a sustainable growth strategy that promotes a range and choice of new housing and employment sites in sustainable locations with good access to employment, public transport, community facilities and shops. Policies within the plan inter alia SP10 – Sustainable Transport and key site policies HG1 KS1-5 will ensure that new development is designed to encourage walking, cycling and public transport use end reduce the dependency on the private car and support modal shift through schemes such as travel planning and reduced parking provision.

Details on the availability of public transport services within Dinas Powys is set out above and more detail on concerns regarding the unsuitability of the surrounding area to accommodate active travel schemes and improvements is set out below.

The Council acknowledges the concerns raised regarding the existing constraints in the vicinity of key site HG1 KS2 North of Dinas Powys, including narrow footways, restricted carriageway widths, and the perceived limitations that these might have on delivering

sustainable transport improvements. However, these concerns are not considered to preclude the site's suitability within the Deposit RLDP when assessed appropriately in a strategic planning context. As set out below, it is important to emphasise that the RLDP is a strategic land use plan, which identifies broad locations for development rather than delivering detailed design solutions. The Plan is not expected to resolve all localised physical constraints at this stage. Instead, it establishes key principles for sustainable development, including prioritising active travel and reducing reliance on private vehicles and requires development proposals to demonstrate how they will mitigate constraints and deliver appropriate access improvements through subsequent stages. Detailed design solutions—including footway widening, traffic management, or alternative route creation—are appropriately addressed through master planning, transport assessments, and planning applications, rather than at the plan allocation stage.

While the current highway environment may present challenges, it does not mean that improvements are unachievable or that the site is inherently unsustainable. Many settlements across Wales exhibit similar historic constraints, yet incremental and targeted interventions have successfully improved accessibility over time. It should be noted that both the active Travel (Wales) Act 2013 and the Active Travel Act Guidance (July 2021) do not require all routes to meet ideal standards in every location, particularly in constrained environments and the duty on local authorities and the Welsh Ministers state that both are required to take 'reasonable steps to enhance the provision made for walkers and cyclists'. The Act and the guidance therefore recognise proportionality in challenging environments where limitations might apply.

Notwithstanding the above, any allocation within the RLDP will be subject to further detailed assessment at the planning application stage. This work will include Transport Assessments and Active Travel Audits, which will rigorously examine pedestrian and cycle connectivity, highway safety and identify opportunities for enhancement and where necessary, development will be required to deliver or contribute to off-site mitigation measures through planning obligations or conditions.

Therefore, while the concerns regarding existing highway and footway constraints are noted, the Council is of the opinion that the RLDP provides a strategic framework to guide sustainable transport improvements and that existing constraints are capable of mitigation through design, intervention, and investment. Detailed solutions will be developed at the application and delivery stages, and this approach is consistent with national policy and legislation. Accordingly, the site is not considered fundamentally constrained in a way that would prevent the delivery of appropriate and sustainable access arrangements over the plan period.

The concerns raised regarding the perceived lack of credible proposals to improve transport and active travel within Dinas Powys are noted; however, it is important to recognise the strategic nature and purpose of the RLDP within the development plan hierarchy.

The RLDP is required, by national planning policy and legislation, to provide a high-level spatial framework for future growth over the plan period. As such, it does not seek to set out detailed, site-specific transport schemes or fully designed active travel interventions at

this stage. Instead, it identifies the broad locations for growth, key transport principles, and strategic infrastructure priorities necessary to support sustainable development. In this context, the Plan:

- Prioritises sustainable transport modes, embedding the principles of reducing reliance on private car use and encouraging modal shift in accordance with Planning Policy Wales and Llwybr Newydd (Wales Transport Strategy).
- Aligns with regional and national transport strategies, including the work of Transport for Wales and the Regional Transport Plan, which are the appropriate mechanisms for developing and delivering detailed transport schemes.
- Identifies key strategic transport corridors and constraints, ensuring that development is directed to locations that are, or can be made, accessible by a range of sustainable modes.
- Supports active travel objectives, including walking and cycling, by promoting development patterns that are compact, connected, and integrated with existing and planned active travel networks.

Policies HG1 KS1-5 provides illustrative masterplans for each of the key sites and sets out what each site will be required to provide. Independent site viability appraisals undertaken in support of each site ensures site delivery and the ability of each site to financially support the necessary infrastructure specified within each key site policy, including contributions to sustainable transport and highways.

Site-specific transport improvements will be progressed through subsequent stages, including master planning, planning applications, and infrastructure delivery plans. The Council will continue to work collaboratively with Transport for Wales, Welsh Government, and other stakeholders to secure investment and bring forward schemes. Active travel enhancements will be delivered through Active Travel Network Maps (ATNM) and associated funding programmes, which sit alongside the RLDP and provide greater detail.

Therefore, while the Deposit RLDP does not include fully detailed transport schemes, it provides a sound strategic framework that integrates land use and transport planning, supports sustainable and active travel and enables the delivery of appropriate infrastructure through subsequent implementation mechanisms. Accordingly, the Plan is considered consistent with national policy requirements and provides an appropriate and credible basis for addressing transport and active travel needs over the plan period.

The Council notes the concerns raised over a potential active travel access via a lane to the rear of Georges Row, which residents claim is private The Council has reviewed ownership records and part of the lane between 24 and 26 Georges Row is classified as adopted highway. The remaining part of the lane is unregistered on Land Registry records. It should be noted that whilst the information prepared in support of site HG1 KS2 North of Dinas Powys may identify the Georges Row route as an ‘opportunity’ to provide for wider pedestrian access and active travel links to the surrounding area, this would clearly need to be negotiated and in agreement with the private landowner(s). In the Deposit Plan, this route is not shown on the indicative masterplan for the site but is referenced in the wording of the policy. Given the uncertainty of delivering this access point due to ownership and to

ensure consistency with the illustrative plan, it is proposed that the wording of Policy HG1 KS2 be amended as follows to remove reference to Georges Row. This should instead refer to the existing link from Seel Park to Highfield Close.

The Council notes the concerns raised regarding compliance with the Active Travel (Wales) Act 2013 and the adequacy of active travel provision associated with the proposed allocation. However as set out above, the RLDP is a strategic plan, which establishes the overarching framework for sustainable development rather than providing detailed, site-specific design solutions. As such, it is not expected to demonstrate fully designed active travel infrastructure at this stage. Instead, the Plan sets out clear policy requirements to ensure that development proposals prioritise walking, cycling and public transport, in accordance with national policy and legislative duties.

The concerns raised largely reflect existing baseline conditions and constraints within the settlement, including narrow footways, limited cycle provision and accessibility challenges at Eastbrook Station. While these issues are acknowledged (and have been responded to above) they do not in themselves preclude development. Rather, they highlight the need for targeted improvement, which the Plan seeks to secure.

With regard to deliverability, the Act does not require that all routes meet ideal standards at the outset, but that authorities take a progressive and evidence-led approach to improving active travel infrastructure. Detailed consideration of route width, gradients, accessibility and connectivity will be undertaken at the planning application and master planning stages, supported by Transport Assessments and Active Travel Audits. In terms of accessibility and inclusivity, development proposals will be required to have regard to inclusive design principles and relevant equality considerations. Opportunities to improve access to key transport nodes, including Eastbrook Station, will continue to be explored in collaboration with relevant partners.

Therefore, while the concerns raised are noted, the Council considers that the RLDP provides an appropriate and policy-compliant framework to secure sustainable and active travel improvements, and it is through subsequent stages that the detailed measures necessary to fulfil the objectives of the Active Travel (Wales) Act will be delivered. It is considered that the location of the site and proposed active travel improvements accords with the intentions of Planning Policy Wales and the Active Travel (Wales) Act as the site is in a location where residents can choose to travel by means other than the car.

Proposed Change

Amend the wording of Policy HG1 KS2 be amended as follows to remove reference to Georges Row. This should instead refer to the existing link from Seel Park to Highfield Close:

The inclusion of walking and cycling links between the development and **Highfield Close via** Seel Park ~~and George's Row.~~

Issue - No Requirement for Additional Housing in Dinas Powys

- Lack of clear evidence for 250 houses in Dinas Powys and that housing need is greater elsewhere in the Vale of Glamorgan.
- Concerns that birth rates are falling and that the population is ageing and that there is therefore no need for further housing.
- Housing growth in Dinas Powys is disproportionate to its role and capacity.
- Dinas Powys has already experienced significant growth in previous plans.

Council Response

The concerns raised by respondents regarding the scale of housing proposed and the need for additional housing in Dinas Powys are noted.

All local authorities within Wales must consider future population and household growth and set out housing requirements in LDPs to meet projected growth. The housing requirement and the assumptions that have informed it are set out in BP7 Housing and Employment Growth Options and BP8 Demographic Evidence. The projection has been derived from a range of information sources.

The RLDP sets a requirement for increase of 7,587 additional households. This equates to the need for some 7,890 additional dwellings over the period 2021-2036. To meet this increased population and household change, the RLDP makes provision for 8,679 dwellings (7,890 plus a 10% flexibility allowance). The housing proposals put forward by the Council shall contribute towards delivering the identified requirement.

The Councils' Local Housing Market Assessment highlights that there is high affordable housing need within the Vale of Glamorgan. This affordable housing need across the authority, indicating there to be an annual need based on RLDP projections for 1,114 affordable units during the next five-years and a further 196 units per annum over the following 10 years, equating to a need for 502 affordable units per annum over the 15 year period.

In relation to housing needs in Dinas Powys, as of February 2026, the Council waiting list identified that there were over 400 persons/households registered on the Council's Housing waiting list for Dinas Powys (nearly 200 in the highest priority need) and some 7,700 in total across the Vale as a whole. The proposed housing is within an area where the target as set out in Policy SP8 is for 40% of all units to be affordable. The site will therefore be required to deliver a minimum of 40% affordable housing and contribute towards much-needed housing for those in the greatest need.

The RLDP spatial strategy prioritises growth within the most sustainable locations, including Barry, Penarth and Llandough, which accommodate most allocations. However, national policy (Planning Policy Wales) requires that development is also distributed across the settlement hierarchy to support sustainable communities, maintain rural vitality and ensure that housing need is met locally where it arises. Limiting development only to the largest settlements would conflict with these principles and would fail to address localised demand. In this context, Dinas Powys is identified in the Settlements Appraisal Review (June 2023) BP5 as a Primary Settlement i.e. a settlement with a significant population and typically at

least one key service or facility (school, health service or local or neighbourhood shopping centre).

These settlements support a range of day-to-day services, as well as benefiting from frequent public transport services (either bus and/or rail) and access to an element of local employment. This range of facilities is considered to make Dinas Powys appropriate to accommodate a proportion of the housing growth required and the scale of the proposed development, circa 250 dwellings, is modest in the context of the overall RLDP.

Concerns that Dinas Powys has already accommodated sufficient development are acknowledged, however, the RLDP must plan for future needs over the plan period to 2036, not solely reflect past delivery.

With respect to falling birth rates, whilst it is acknowledged that birth rates have declined in recent years and that the population profile is ageing, the housing need identified within the RLDP is not derived solely from natural population change and seeks to address identified needs now rather than some point in the future, as children being born now will not form their own households within this plan period. Successive household projections have shown increases in the formation of single person households, a trend that is particularly prevalent in the older age groups. This means that even if the population itself were to remain constant, there would still be an increase in households that must be accommodated in the plan.

The suggestion that there is no need for additional housing in Dinas Powys is therefore not supported. Indeed, some representations themselves highlight the difficulties experienced by young households and local families in accessing suitable housing to remain in the Dinas Powys area, reinforcing the presence of localised demand.

Issues - Education

- Local primary and secondary schools are at or over capacity, St Cyres and Stanwell schools are specifically mentioned. Some responses note existing difficulties in securing school places for current residents.
- The RLDP fails to provide evidence that new or expanded education provision will be provided and that Section 106 contributions are insufficient and/or unreliable and there is no guaranteed delivery mechanism for new or expanded education provision.
- Concerns that 250 new houses could potentially generate significant numbers of additional children that would need to be accommodated in an already overcrowded system, leading to the need for children to travel further to school, increased class sizes and reduced quality education.
- Lack of consultation with education providers.

Council Response

The Council acknowledges the concerns raised in respect of the existing education provision and the demands placed by the proposed key site HG1 KS2 North of Dinas Powys. However, in preparing the RLDP, the Council has undertaken an assessment of educational need

generated by projected future housing growth associated with the RLDP, including assumptions in respect of windfall sites across the Vale of Glamorgan.

The background paper (BP43 Education) evaluates whether existing school capacity can meet future demand, identifies where new or extended facilities are needed, and outlines the strategic approach for delivering these requirements. It focuses on nursery, primary, secondary, and additional learning needs (ALN) provision, with reference to Welsh-medium and denominational education commitments under the Welsh in Education Strategic Plan (WESP). The pupils generated have been assessed by school cluster (Barry, Cowbridge, Llantwit Major and Penarth) and by individual school. Where there is insufficient capacity to meet the demand generated by RLDP development, the background paper sets out how this will be accommodated and identifies where new schools and/or extensions to existing schools will be required to address this. Planning and education colleagues have worked collaboratively in preparing the background paper.

The background paper indicates that, based on pupil forecasts, the HG1 KS2 North of Dinas Powys site would generate the need for 53 secondary and 59 primary school places. However overall, within the Penarth Cluster, the background paper indicates that at primary school level there is sufficient capacity within the cluster area overall to accommodate all pupils generated from RLDP sites. However, there is a lack of capacity at specific catchment schools, most significantly Dinas Powys Primary and St Andrews CIW at English Medium and denominational level. There is sufficient capacity for Welsh Medium. At secondary level, there is sufficient capacity for Welsh Medium and Roman Catholic demand, but there is projected to be an overall shortfall of spaces at the catchment English medium secondary, St Cyres, and additional capacity will be required in the cluster area. Full details of the assessment and identified additional need is set out in the background paper. To meet this shortfall in the identified capacity, the background paper identifies that additional capacity will be required.

To ensure a robust delivery mechanism to meet the needs associated with proposed development sites, the Council has prepared an Infrastructure Delivery Plan (IDP), background paper BP44 in support of the RLDP. The paper outlines the infrastructure required to support the RLDP's strategic objectives, with a focus on a long-term, sustainable, and collaborative approach to development. The IDP identifies existing infrastructure, highlights planned improvements, and details the new infrastructure central to unlocking the development of allocated sites. The IDP identifies the need for new schools, upgrades to the transport network to support sustainable travel, and the timely provision of utilities like water and electricity. The document also highlights the role of developer contributions through Section 106 agreements to fund these necessary improvements. The key requirements of the IDP are also detailed in Appendix 2 of the RLDP and the need for off-site financial contributions towards the delivery of additional school places is set out in the wording of Policy HG1 KS2.

In considering the necessary infrastructure requirements, all key sites have been subject of detailed development viability appraisals, (BP42 Viability Assessment and BP 42A Independent Financial Viability Assessments of Key Sites refer). These appraisals have included associated infrastructure costs that have been tested to ensure that the

development can financially support the contributions towards the identified infrastructure. These viability appraisals will be reviewed at the planning application stage to account for any changes in infrastructure requirements.

Therefore, while acknowledging the concerns raised in respect of education provision associated with the key site HG1 KS2 North of Dinas Powys, the Council considers that the RLDP and the background evidence that supports it as set out above demonstrates that education impacts have been robustly assessed at a strategic level, there is sufficient capacity and/or deliverable mitigation measures in place and that there are clear mechanisms (policy + funding) to secure the provision that will be required.

The Planning department have worked closely with the Education department in the preparation of the evidence base as, for the majority of schools within the Vale, the admission arrangements and pupil forecasts are the responsibility of the Education department, not individual schools. Notwithstanding this, individual schools were advised of the consultation as part of the ConnectED weekly bulletin which is circulated to all schools.

The Health Board is a statutory consultee which makes representations in respect all health-related issues, including General Medical Services (GMS) capacity. Individual GP surgeries are not specifically listed within the Delivery Agreement as consultees as the Health Board's role is to represent their collective interests.

Issue - Healthcare and Emergency Services

- Local GP provision at Dinas Powys Medical Centre is already operating beyond capacity having absorbed patients from Penarth practise closures and the cumulative impacts of other new developments.
- Concerns that population growth from new housing would increase pressure on and restrict access to already overstretched local healthcare services.
- No evidence of healthcare capacity assessment and no demonstrable plan to expand NHS/GP provision in the area.
- Related impacts on wider health services e.g. dentist, general NHS capacity and emergency services.
- Need a clear commitment for additional GP capacity or expanded NHS provision.
- Experiencing long waiting times for appointments.
- Health centre has not been consulted.

Council Response

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Eastern Vale which includes Dinas Powys and Penarth, the Primary, Community and Intermediate Health Care assessment indicates that the overall position has stabilised following the UHB's acquisition of Redlands Surgery. There is no capacity for further expansion, future growth depends on developing integrated facilities in partnership.. The proposed Wellbeing Hub at Penarth Leisure Centre is currently paused due to updated flood risk data from Natural Resources Wales (NRW), with no alternative site or funding identified to progress the Outline Business Case. The UHB is exploring a potential integrated services development at Cosmeston Farm, in collaboration with the Council and aligned with Section 106 opportunities. The assessment indicates that while there are no immediate plans to increase the number of commissioned providers/services. The ability to absorb future growth for GMS within this area will be reliant on the development of integrated wellbeing solutions and the adoption of new ways of working.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.
Therefore, while the concerns regarding GP access and local service pressures are acknowledged, the Council considers that the RLDP, and the associated evidence base, provides an appropriate, proportionate, and deliverable framework to ensure that healthcare needs arising from planned growth in Dinas Powys and Penarth can be addressed through established and evolving NHS planning mechanisms.

Regarding emergency services, these organisations are statutory consultees to the Replacement LDP and as such have been formally contacted in respect of the proposed housing growth. No issues have been raised by the emergency services in respect of the RLDP.

The consultation has been carried out in accordance with Council's approved Delivery Agreement, which prescribes the statutory and non-statutory consultees that will receive notification of the consultation. The Health Board is a statutory consultee which makes

representations in respect all health-related issues, including General Medical Services (GMS) capacity. Individual GP surgeries are not specifically listed within the Delivery Agreement as consultees as the Health Board's role is to represent their collective interests.

Issue - Utilities

- No evidence that the existing sewerage and water infrastructure will be improved.
- Concerns that additional sewage from the proposed development will increase pollution, discharge into the sea and impact public health.

Council Response

The comments from DCWW have been addressed in the statutory consultation section above. It is recognised that they have identified a requirement for a hydraulic modelling assessment at planning application stage. Should this identify that improvements are necessary, then the developer will be required to fund these improvements.

Accordingly, at this stage in plan preparation, the Council is satisfied that the existing infrastructure is capable of accommodating discharge from the proposed development and that appropriate measures are in place to ensure that development of the site will only proceed once detailed surface water and drainage mitigation measures have been identified and approved by the Council. Any unforeseen issues with capacity or the ability of the sewerage system to accommodate discharge form the proposed development identified will be addressed through the normal development process channels in consultation with Dwr Cymru Welsh Water.

Issue - Other Infrastructure

- Lack of existing local community facilities and amenities such as libraries, leisure facilities, parks, open spaces, and informal recreation areas to support the additional housing.
- The proposed development is not supported by adequate infrastructure or the provision of new community facilities.
- Additional housing is likely to place further pressure on already constrained services and reduce accessibility to local centres and everyday services, giving rise to wider concerns about quality of life and social wellbeing.

Council Response

The Council will seek appropriate contributions from site developers towards enhancing recreational and community facilities. S106 contributions can be sought from developers towards the costs of providing community and social infrastructure, arising from the development.

Issue – Biodiversity and Ecology

- The ecology survey is not fit for purpose as it was carried out by the developer.
- Loss of ancient trees and hedgerows
- Loss of grasslands and wetlands
- The site supports species including bats, dormice, newts, birds of prey and other birds, insects, reptiles and other animals.
- General loss of the natural environment which should be protected for wildlife, flora and fauna.
- The development would result in habitat fragmentation.
- Green Infrastructure Strategy references access to two areas of woodland in private ownership, which the landowner does not support.

Council Response

A preliminary ecological assessment (PEA) has been undertaken for the site, and it is acknowledged that detailed ecological surveys have not yet been undertaken however, this is typical at the plan-making stage and it is considered that this approach is consistent with national policy and standard practice, and does not preclude allocation at this stage. While the PEA covers the initial much larger Candidate Site submitted to the Council, it is considered that the information and findings of the document are sufficient at this stage of the RLDP process. The PEA was completed by a competent qualified ecologist at an ecology consultancy.

The PEA identifies that the site comprises fields of grazed pasture and hay meadows of moderate biodiversity value. Field boundaries are delineated by a network of mature intact and defunct species-rich hedgerows / hedge and trees, with trees of local value to biodiversity. Two small woodland parcels are in the centre and southern sections of the Site. Both the woodland and hedgerows meet the definitions of habitats of principal importance under the revised Section 7 list of species and habitats of principal importance under the Environment (Wales) Act, updated 2026.

Importantly, the PEA identifies that habitats on the site have the potential to support the following protected species: including great crested newt (and other amphibians), bats (roosting, foraging, and commuting), breeding birds (including barn owl), hazel dormouse, otter (foraging and commuting) and reptiles. Priority mammal species may also be present.

The PEA recommends that retaining hedgerows, woodland, and mature trees would reduce potential impacts to protected species. The design of development within the site will determine the scope of further survey work, which may include:

- Bat surveys of buildings and mature trees likely to be affected by the proposed development.
- Breeding bird survey including a check for barn owl within farm buildings on Site.
- Great crested newt survey of the on-site pond.
- If hedgerows and mature trees are to be lost to facilitate development, a bat activity survey and hazel dormouse survey is recommended to determine the use of the site by both species and inform site design and a lighting plan.

- A reptile presence / (likely) absence survey to determine population size and inform mitigation measures.
- Consultation with the Local Planning Authority to agree the scope of survey work (as required).

In addition, the PEA makes recommendation on measures to avoid and/or reduce impacts associated with the development of the site, and these include but are not limited to:

- Control measures to ensure no materials / pollutants can enter on Site and adjacent water courses should be incorporated into Construction Environmental Management Plan (CEMP) for the Site.
- Boundary vegetation and habitats of ecological importance should be retained and enhanced within the proposed development. Adopt sensitive management practices during construction by providing suitable buffers / stand offs (root protection areas) from retained areas.
- Existing access points and field gates should be used to facilitate access across the Site where possible.
- Lighting should be sensitively designed to avoid adverse effects on bats and hazel dormouse (if present).
- Sensitive working methods should be adopted during the construction phase to avoid impacts to protected species (if present), reptiles and other notable mammal species (hedgehog).

Current policy and legislation place a duty on public authorities and developers to not only maintain biodiversity but also include enhancements for nature conservation and biodiversity. In this regard, the PEA recommends that the following measures be incorporated into future site design:

- Enhancement of any retained habitats (hedgerows woodland, and mature trees).
- New habitat creation within drainage schemes to benefit a range of aquatic / wetland species.
- Incorporating native species of local provenance into landscape design.
- Incorporation of habitat enhancement for reptiles, amphibians, invertebrates, and small mammals.
- Inclusion of bat and bird boxes within the building design.

In this respect the indicative concept masterplan for the site included in the Deposit Plan for key site HG1 KS2 Land to the north of Dinas Powys, includes significant areas of public open space, drainage features and the retention of woodlands, trees and hedgerows to maintain habitat connectivity. Nevertheless, the Council will require further detailed site designs to be provided at the planning application stage along with detailed ecological surveys that will evidence how the site layout has responded to the ecological constraints identified within the site. NRW will also be fully consulted at the planning application stage and their views fully considered in the determination of the planning application.

The development will also be required to comply with national and local policy for achieving Net Biodiversity Benefit and improving the resilience of ecosystems as required by Planning

Policy Wales, Edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. In this respect, as a statutory consultee NRW will have oversight of any mitigation measures proposed at the planning application stage to ensure delivery of these objectives.

Further Policy HG1 KS2 – Land to the North of Dinas Powys, requires the retention and provision of green Infrastructure corridors and recreation spaces and all future planning applications will be required to comply with policies SP19 Green Infrastructure and SP20 – Biodiversity and Ecosystem Resilience.

Additionally, any future development at the site would have to provide a detailed Green Infrastructure Strategy for the site that shall incorporate green infrastructure will also contribute towards delivering a biodiversity net benefit. More detail on this will be determined at planning application stage. Nevertheless, at this stage principles for protection and net-benefit opportunities have been identified as part of the initial site master planning.

Concerns have been raised that the supporting GI Strategy references that planting and alterations will be carried out to enable access to adjoining woodland which is in private ownership. The landowner does not agree with public amenity use of these woodlands due to potential conflict between the public and livestock and also with forestry works. The concerns are noted. The key site policy does not reference a requirement for links into private woodland. The GI Strategy does reference the adjoining woodland as a GI Asset and identifies opportunities for planting as part of a green wildlife corridor. This green corridor has the potential to enhance biodiversity. The GI Strategy states “ancient woodland adjacent to the site would be maintained and additional parkland will be created and enhanced to provide amenity space for future residents and existing residents of the adjacent neighbourhood.” It does not specifically state that the ancient woodland would form part of the amenity space. The intension would be that the additional parkland that is referred to will be provided on site.

Issue - Loss of Green Wedge

- The site lies within a designated Green Wedge between Dinas Powys, Penarth and Llandough which was designated to prevent urban sprawl and preserve the rural character and openness of the landscape and risk coalescence between the settlements.
- Development as proposed within the Green Wedge would significantly erode the distinct settlement identity and character of Dinas Powys changing it from a village to a town and transforming it into a suburban extension of Cardiff/Penarth.
- Allowing development within the Green Wedge would risk undermining the designation and impact the long-term effectiveness of the policy.
- Background evidence to other development plans have stated the importance of the land included within the green wedge designation and how it should be protected from future development.
- Candidate Site Stage 2 Assessment Register rejected other nearby sites within the same Green Wedge (including sites overlapping geographically) on the basis that development would harm the integrity of the designation.

Council Response

Green Wedges are local designations which serve as an urban containment mechanism intended to restrict the spread of built development beyond designated settlement boundaries and allocated development sites. Where designated, green wedges comprise the open areas around, and between, parts of settlements and seek to maintain the distinction between the countryside and built-up areas and prevent urban coalescence.

Planning Policy Wales Edition 12 (February 2024) (PPW) advises that green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust. PPW also advises that unlike green belts which should be protected for a longer period than the relevant current development plan, green wedges where they are proposed, should be reviewed as a part of the development plan review process (paragraph 3.64 refers).

In line with national policy, the Council has undertaken a review of the existing adopted LDP green wedge designations (Background Paper 27 Green Wedges). In reviewing these designations, the Council has utilised the regionally agreed 'Southeast Wales Green Wedge Definition Criteria' Method Statement. This method statement outlines the policy and geographical context for green wedge designations across the region, explores the established methodologies used by local authorities to date and proposes a methodology that can be implemented on a consistent basis across Southeast Wales to assess and refine existing or candidate green wedges, employing an assessment proforma to record and map relevant information.

The methodology entails four stages of assessment, these are

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

When assessed against these criteria, the review maintains the justification for a green wedge designation between Dinas Powys, Penarth and Llandough.

Notwithstanding the above, one of the main functions of the Replacement Local Development Plan (RLDP) is to ensure that there is sufficient land available within the Vale of Glamorgan to deliver the required future housing requirements over the lifetime of the plan. The background evidence to housing need is set out in the RLDP Background Paper BP7 Housing and Employment Growth Options Paper (September 2023).

In order to identify suitable sites for development within the RLDP, a 'Call for Candidate Sites' was made between the 17 June and the 13th September 2022 when the Council invited site promoters the opportunity to submit sites for consideration by the Council, with an additional 3-month period thereafter to enable site promoters to submit any relevant

supporting information. During this period 148 sites were submitted to the Council for a range of uses including housing, employment, renewable energy, minerals, and open space.

A further 'Call for Candidate Sites' was made as a part of the formal consultation on the Preferred Strategy, and the call for candidate sites was undertaken alongside the Preferred Strategy consultation, which ran from 6 December 2023 to 14 February 2024. A total of 38 sites were received, of which 13 were entirely new submissions and 25 were amended sites previously submitted during the initial call for sites.

All sites submitted were assessed on their own merits in accordance with the Council's 4 stage assessment process as detailed with the site methodology.

Therefore, while the concerns expressed in the representations relating to the assessment of candidate sites is noted, the Council is satisfied that the assessments are robust and reflect the merits of each candidate site and that key site HG1 KS2 North of Dinas Powys represents an appropriate and sustainable allocation that accords with the strategy of the RLDP.

In respect of the loss of a part of the Green Wedge to accommodate the key site, the Council has concluded that in the light of the identified housing need within the Vale of Glamorgan as set out in the background paper BP10B Local Housing Market Assessment, that by reallocating an element of the green wedge between Dinas Powys, Penarth and Llandough is justified and a necessary step towards addressing the urgent housing needs in the Vale of Glamorgan.

In reaching this conclusion, the Council has considered that:

- PPW clearly identifies that green wedges are non-permanent planning designations that require review as an integral part of the RLDP process and that their boundaries may be amended to reflect changing land use priorities. The current housing crisis within the Vale of Glamorgan represents such a circumstance, necessitating a re-evaluation of the green wedge boundaries.
- While it is important to protect agricultural land, it is equally important that such protection is considered against other priorities and objectives. The Vale of Glamorgan faces a significant housing shortage, especially affordable housing.
- The proposed allocation is located adjacent to the primary settlement of Dinas Powys which offers good public transport links and a range of services and facilities.
- Significant preparatory work on placemaking and master planning has already taken place to ensure that development of the site would be carefully managed and that key environmental and landscape features are maintained and enhanced. In addition, the introduction of Green Infrastructure throughout the site offers opportunities to enhance the settlement edge and maintain the overall integrity of the green wedge designation.

Concerns have been expressed regarding the loss of the green wedge and that this would risk undermining the designation and impact the long-term effectiveness of the policy. While these concerns are noted, the Council considers that the green wedge identified in

Policy DNP2 - Green Wedges, between the settlements of Dinas Powys, Penarth and Llandough and as illustrated on the RLDP Proposals Map remains significant and is capable of fulfilling the role of a green wedge as set out in PPW (Edition 12)(February 2024). Allied with other RLDP policies such as Policy SP3 – Development in the Countryside, the policies provide significant protection to resist speculative development between settlements.

Issue - Loss of Agricultural land

- The land is classified as Grade 2 and Grade 3A agricultural land, defined as the Best and Most Versatile (BMV) land considered valuable for food production in South Wales.
- The site is valuable open space, farmland and countryside and should be protected from development.

Council Response

National planning guidance specifies that local authorities should seek wherever possible to avoid the development of Grades 1, 2 and 3a agricultural land which are the best and most versatile agricultural land (BMV). Accordingly, the consideration of BMV Agricultural Land has been a key consideration at all stages of plan preparation including through the Candidate Site assessments.

The Council has prepared a background paper BP23A Best and Most Versatile Agricultural Land which set out how the Vale of Glamorgan Council has considered the location and quality of agricultural land in developing the Vale of Glamorgan Replacement Local Development Plan 2021-2036 (RLDP). It explains how the Council through its assessment of candidate sites has considered the need to minimise the loss of the Best and Most Versatile agricultural land (BMV) as required by national planning policy.

The Council's candidate site assessment has examined the agricultural land quality of sites submitted to the Council. The assessment utilises the national predictive agricultural land classification (ALC) maps for the Vale of Glamorgan. These indicate that the site HG1 KS2 North of Dinas Powys comprises primarily grade 3b land with small area of unclassified land and therefore its development would not be contrary with national planning policy.

Issue – Prioritise brownfield land

- Failure of the RDLP to prioritise brownfield land.

Council Response

In accordance with national planning policy, in preparing the RLDP every effort has been made to direct development to previously developed land in the first instance.

In preparing the RLDP the Council undertook an Urban Capacity Study that assessed the potential of brown field land within Barry, Penarth and Llandough to contribute to housing need (background paper BP19A Urban Capacity Study (2025) update refers). While the study did not directly consider Dinas Powys, it did assess the wider area of Penarth and Llandough.

While the assessment provides a theoretical number of dwellings that could be accommodated on brownfield land, it highlighted that reliance on these sources to contribute towards housing delivery is limited due to deliverability and availability constraints.

Therefore, the RLDP recognises that the level and availability of brownfield land to meet identified housing and employment needs over the plan period is limited and that brownfield land alone cannot meet the Vale's development needs. The plan therefore adopts a balanced approach to site identification utilising brownfield land wherever possible but also identifying appropriate greenfield allocations (following detailed site assessments) where necessary to ensure that the RLDP complies with national planning policy and reflects a realistic approach to site allocation and identifies sufficient deliverable land to meet its housing and employment requirement over the plan period.

Issue - Landscape Impact and Loss of Village Character

- Loss of Green Belt / Green Wedge and risk of coalescence between Dinas Powys, Llandough and Penarth.
- Unacceptable intrusion into the rural landscape which erodes the areas landscape character and visual quality which will affect mental wellbeing and the quality of life for residents.
- Development would fundamentally alter the character of Dinas Powys leading to urbanisation and loss of the village identity transforming it from a rural village to a town.
- Need for landscape assessments.

Council Response

Specific concerns regarding the loss of green wedge land have been addressed above. The site is not within a Green Belt.

In including key sites within the Deposit RLDP the Council has required site promoters to submit background evidence in support of their sites including Preliminary Ecological Assessments, Viability Assessments and Landscape Assessments where relevant.

A range of supporting documentation was submitted in support of site HG1 KS2 Land to the North of Dinas Powys, including a Landscape Summary (August 2023) and Green Infrastructure Strategy (August 2923). These documents built on an earlier Landscape Study prepared in September 2022 for a much larger site submitted for consideration as a part of the RLDP.

The Landscape and Green Infrastructure assessments identify that the proposed site has been subject to proportionate Landscape and Visual Impact Assessment (LVIA) in line with guidelines prepared by the Landscape Institute (LI) and IEMA 3rd Edition (2013) (GLVIA) and the indicative masterplan has been prepared with a landscape led design approach.

The assessments indicate that the landscape of the site is not of high intrinsic landscape sensitivity overall and represents a transitional urban fringe landscape that exhibits elements of decline and limited management. The site lies in a LANDMAP area of predominantly moderate value for landscape, historic and visual/sensory aspects and is relatively well contained visually because of the local topography, existing vegetation and the surrounding built form.

The Council acknowledges that development of the site will result in the loss of lower value agricultural land and would alter the character of the site from open fields to built form. This change would be most apparent immediately adjacent to existing residential properties, where there is potential for adverse effects on private views. However, these impacts, while material to residents, are typical of edge-of-settlement development and are largely unavoidable given the site's location. In acknowledging these localised impacts, the assessment identifies mitigation and enhancement measures, including the opportunity to create a stronger, more coherent and landscaped settlement edge, enhanced green infrastructure, improved long-term management of boundary vegetation, and better integration with active travel and countryside access.

Furthermore, any future planning application will be required to be accompanied by a full Landscape and Visual Impact Assessment (LVIA) prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) published by the Landscape Institute (LI) and IEMA 3rd Edition (2013) and which would build on the principles of the initial assessment, alongside detailed design and landscape proposals reflecting any recommendations of the full LVIA.

Representations have raised concerns that the proposed development of the site HG1 KS2 North of Dinas Powys would have an adverse impact on the identity of Dinas Powys. Particular concerns have been raised that the development would erode the 'village' character of the settlement and result in it becoming part of the wider urban environment of Penarth and Llandough.

While the concerns are noted, the Council would argue that the identification of Dinas Powys as a village with the implied rural characteristics is inaccurate. While certain areas of the settlement may maintain characteristics associated with a village e.g. Dinas Powys Green, Dinas Powys has experienced significant growth over many decades with housing developments such as Parc Bryn-Y-Don and Longmeadow Drive to more recent developments such as those at St Cyres and Caerleon Road.

This growth is reflected in the Council's Settlements Appraisal Review (June 2023) BP5 where Dinas Powys is identified as a Primary Settlement i.e. a settlement with a significant population (usually more than 1,000 residents) and typically at least one key service or facility (school, health service or local or neighbourhood shopping centre. These settlements support a range of day-to-day services, as well as benefiting from frequent public transport services (either bus and/or rail), and access to an element of local employment. This range of facilities is considered to make Dinas Powys appropriate to accommodate a proportion of the housing growth required and the scale of the proposed development, circa 250 dwellings, is modest in the context of the overall RLDP.

Therefore, while the importance of safeguarding the character and identity of Dinas Powys is acknowledged, and the concerns expressed in the representations are noted, it is considered that the proposed allocation forms part of the continued development of the settlement and reflects its scale and the range of services and facilities available and is in accordance with the Council's identified RLDP strategy and identified settlement hierarchy.

It is acknowledged that the development would fundamentally alter the character of the land, and in the context of the existing LDP that land is countryside. However, while brownfield land is prioritised where possible, there is insufficient brownfield land (or land in core inner settlement locations) to come close to meeting housing need. Consequently, there are elements of the proposed housing supply that unavoidably require greenfield land and it is unavoidable in those circumstances that the character of the land will change. It is the purpose of the RLDP process to enable submitted candidate sites to be assessed, in order that housing need and growth can be met on the most appropriate sites, where those impacts are managed and minimised as far as possible. The Vale of Glamorgan is located within a National Growth Area in Future Wales, and this RLDP must be consistent with Future Wales. For the reasons give above, it is considered that the visual and landscape impacts are manageable and are balanced appropriately with the need for growth and housing (esp. affordable housing).

While representations frequently highlight concerns regarding the weakening of identity through the loss of green space and reduced settlement separation, as detailed above, these are matters that can be mitigated and addressed through careful master planning, landscape design, and adherence to the policy requirements.

Issue - Other issues raised

- The Green Infrastructure Strategy shows a footpath/cycle path that terminates on the western boundary with an arrow pointing into an adjacent farmyard. The adjoining farm is private land with no right of access.
- Contrary to RLDP Objectives
- Impact on Residential Amenity
- Disruption during construction phases of the development.
- Anti-Social Behaviour and Crime
- The development should use Traditional Architectural Design Codes.
- The consultation lacks transparency, accessibility and was not fully inclusive with no evidence of how responses will influence the process.

Council Response

Potential access on private land

The indicative plan included within the Deposit RLDP does not show a proposed access into private farmyard at Mill Farm and the policy does not reference this as a requirement. Whilst it is noted that a footpath/cycle path is shown to extend to the edge of the site

boundary, this is indicative and the exact route within the site boundary is a detailed matter that will need to be determined at planning application.

Conflict with RLDP Objectives

Representations raise concerns regarding the proposed development being contrary to the stated objectives of the RLDP. The allocation of the key site HG1 KS2 Land North of Dinas Powys must be considered in the context of the overall RLDP strategy. This seeks to deliver sustainable plan-led growth that meets housing and employment need in sustainable locations that are well served by public transport while balancing the need for growth against the need for environmental protection and climate resilience. Therefore, while concerns are noted, the Council considers that the principle of development of site HG1 KS2 is consistent with the strategic objectives of the RDLP and represents a balanced approach to delivering housing need alongside environmental and infrastructure considerations.

Residential amenity

The protection of residential amenity is a material planning consideration when determining planning proposals. Presently, the master plans contained with the Deposit RLDP are indicative and merely illustrate the general location of development within the site boundary taking account of existing site constraints. Further detailed work will be required at the planning application stage, and this will include a requirement to incorporate suitable separation distances from existing residential properties, landscaping, and design solutions to protect neighbouring residential, safeguard privacy and reduce visual impacts.

Disruption during construction

This is a matter that will be addressed at the planning application stage, with planning conditions placed on the granting of planning permission that inter alia, would seek to control the hours of construction, the management of nuisances arising from dust, traffic and noise.

Anti-Social Behaviour

A number of representations raise concerns that the proposed development could give rise to anti-social behaviour, particularly in relation to the proposed new pedestrian and cycle links identified in the indicative master plan, and changes in the pattern of movement through existing residential areas. While these concerns are noted, the Council formally consults the South Wales Police Designing Out Crime Officer on all major developments who provides advice in respect incorporating measure to ensure developments are safe and reduce opportunities for anti-social behaviour. Where possible, these measures will be incorporated into site design.

Use Traditional Architecture Design Codes

The Council does not intend to mandate design codes for the site, but at planning application stage, as set out in Policy SP4, major developments will need to prepare Placemaking Statements which consider placemaking principles.

Consultation process

While the comments with regard the inadequacies of the public consultation are noted, the Council disagrees the public consultation undertaken between 28th January and 11th March 2026 lacked transparency, accessibility or meaningful engagement. A composite response on the consultation itself has been provided separately.

Issue – Inclusion of mandatory policy wording

- The allocation should either be removed from the LDP or should incorporate mandatory policy wording, evidence requirements and safeguards.
- Include Policy FR-X: Catchment-Wide Flood-Risk Assessment
- Include Policy FR-Y: Groundwater and Overland Flow Protection
- Include Policy SuDS-X: Sustainable Drainage Requirements
- Include Policy INF-X: Infrastructure Delivery and Phasing

Council response

With regard to the proposed flood risk policy, planning applications must be assessed in accordance with the requirements of Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion, which provides comprehensive national guidance on the assessment of flood risk and the management of flood consequences over the lifetime of a development. TAN 15 sets out the framework for determining whether flood risk and its associated impacts can be appropriately avoided, mitigated and managed.

The Development Plans Manual advises that development plans should not duplicate national planning policy. As flood risk is addressed comprehensively through Planning Policy Wales and TAN 15, it is not considered necessary or appropriate to include a separate flood risk policy within the RLDP, or require measures that exceed the requirements set out in national policy.

In respect of groundwater, TAN 15 recognises that flood consequences assessments should consider all relevant sources and mechanisms of flooding where applicable, including groundwater. These matters are therefore addressed through the requirements of national planning policy and site-specific technical assessments undertaken at the planning application stage. Consequently, there is no justification for introducing an additional policy requirement within the RLDP, and no amendment to the Plan is considered necessary.

In relation to the proposed mandatory policy on sustainable drainage, the requirement for development to incorporate Sustainable Drainage Systems (SuDS) is already established through Policy HG1 KS2. Furthermore, the SuDS approval process operates separately from the planning system, with developers required to obtain approval from the Sustainable Drainage Approval Body (SAB) in addition to securing planning permission.

As the provision and approval of SuDS are governed through a separate statutory regime, the inclusion of the suggested policy would fall outside the scope and remit of the

Replacement Local Development Plan (RLDP). Consequently, no amendment to the Plan is considered necessary in this respect.

The suggested Policy INF-X states that development will not be permitted unless all infrastructure upgrades have been identified, funding has been secured, delivery is guaranteed, and the infrastructure is provided in advance of occupation.

The RLDP is supported by an Infrastructure Plan which identifies the necessary infrastructure, associated costs (where known at this stage), and anticipated timescales for delivery. As part of the planning application process, infrastructure requirements will be reviewed in detail, and planning permission will only be granted where it can be demonstrated that the necessary mitigation can be secured and delivered.

With regard to the provision of infrastructure prior to occupation, the Council recognises the importance of ensuring that infrastructure is delivered in a timely manner to support growth and mitigate the impacts of development. However, it is not always appropriate or necessary for all infrastructure to be delivered before the occupation of the first dwelling.

In practice, infrastructure is typically secured through Section 106 agreements and delivered on a phased basis alongside development. This enables infrastructure provision to be aligned with the pace of development and the resulting demand for services and facilities. Requiring all infrastructure to be provided upfront would, in many cases, have significant viability implications, as developers would be required to meet substantial infrastructure costs before receiving any income from house sales.

Accordingly, infrastructure delivery is usually linked to specified occupation thresholds, ensuring that necessary mitigation measures and community facilities are provided at the appropriate stages of development whilst maintaining the overall deliverability of the scheme. The detailed timing and phasing of infrastructure provision will be considered and secured through the planning application process.

Having regard to the above, the Council considers that the existing policy framework is sufficiently robust and that the introduction of an additional site-specific policy requirement is neither necessary nor justified. As such, no change to the Plan is proposed.

Council Overall Response

Following detailed review of the representations submitted in relation to Site KS2 Land North of Dinas Powys, the Council acknowledges the breadth of concerns raised, including infrastructure capacity, transport impacts, environmental constraints, amenity considerations raised within the representations. Infrastructure delivery and appropriate mitigation will be essential to ensure that the development comes forward in a coordinated and responsible manner, and these matters have been considered in the allocation of the site. Further mitigation details will be required at the planning application stage and controlled by appropriate planning conditions.

The Council considers that the allocation of Site KS2 remains sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

However, in order to ensure that Plan reflects potential deliverability issues around one of the pedestrian and cyclist access points, the following minor changes are proposed to the policy wording:

- Amend the bullet point under Policy HG1 KS2 in the Sustainable Transport and Highways section as follows:
    - *The inclusion of walking and cycling links between the development and* ***Highfield Close via*** *Seel Park* ~~*and George's Row.*~~

HG1 KS3 – LAND AT READERS WAY, RHOOSE

Representation ID	Respondent Name	Representation Type
4472	Mr Hugh Connolly [813]	Object
4495	Mr Simon Parker [2821]	Object
4505	Mrs Pam Spence [2822]	Object
4540	Mr Geoffrey Williams [1463]	Object
4542	Mrs Emma Cane [1516]	Object
4590	Mr David Barton [2683]	Comment
4647	Mrs Judy Boakes [2868]	Object
4677	Mr Tim Griffiths [2578]	Object
4694	Mrs Kayleigh Whiteley [2361]	Object
4713	Mr Kelvin Spear [1420]	Object
4772	Mr Alex Leonard [2934]	Object
4820	Mr Hywel Owen [2887]	Object
4953	Mrs Tracey Govier [3027]	Object
4980	Emma Reed [2653]	Object
4999	Mr Ian Allwood [2846]	Object
5070	Mr Shayne Wilford [2132]	Object
5076	Mr Shayne Wilford [2132]	Object
5078	Mr Shayne Wilford [2132]	Object
5080	Mr Shayne Wilford [2132]	Object
5083	Mrs Claire Jefferies [814]	Object
5108	Mrs Anne Sloman [668]	Object
5110	Miss Miranda Davis [3131]	Object
5142	Mr Michael Morgan [3144]	Object
5145	Miss Christie Leat-Bowen [3146]	Object
5150	Ceri-Anne Wilkins [3147]	Object
5151	Mr Andrew Lenthall [3148]	Object
5162	Mrs Rachel Prescott [3150]	Object
5190	Mrs Helen Ashman [3155]	Object
5198	Mr Steve Ashman [3161]	Object
5249	Mr Shayne Wilford [2132]	Object
5252	Mr Shayne Wilford [2132]	Object
5259	Mr Shayne Wilford [2132]	Object
5261	Mr Shayne Wilford [2132]	Object
5264	Mr Shayne Wilford [2132]	Object
5266	Mr James Neagle [3096]	Object
5267	Mr Shayne Wilford [2132]	Object
5271	Mr Shayne Wilford [2132]	Object
5284	Mrs Cara wilson [2070]	Object
5296	Mr Ken Timmins [1489]	Object
5298	Mr Ken Timmins [1489]	Comment
5404	Emma Reed [2653]	Object
5414	Miss Lisa Dutton [3248]	Comment
5424	Mrs Susan Evans [712]	Object
5475	Mr Ken Timmins [1489]	Object
5485	Mrs Deborah Selley [652]	Object
5490	Mr Frank Haschka [3203]	Object

5493	Mr Glyn Lewis [1600]	Object
5580	Mr James Neagle [3096]	Object
5587	Mrs Hilary Neagle [3095]	Object
5619	Dr Rhiannon Yapp [3314]	Object
5634	Mrs Karine Dubois-Jones [3322]	Object
5651	Mr David Entwistle [3264]	Object
5684	Councillor Samantha Campbell [1002]	Object
5771	Mr James Neagle [3096]	Object
5912	Mrs Helen Lynch [3419]	Object
5919	PMG Development Ltd [3426]	Support
5974	Mr & Mrs Malcolm Butchart [3445]	Object
5993	Councillor Samantha Campbell [1002]	Object
6022	Mrs Jacky Williams [3343]	Object
6051	Mrs Gill Sims-Williams [654]	Object
6096	Miss Julia Thompson [2631]	Object
6144	Mr Martin Rauch [3482]	Object
6149	Mrs Laura Rauch [3481]	Object
6197	Councillor Samantha Campbell [1002]	Object
6262	Councillor Gillian Bruce [1018]	Object
6263	Councillor William Hennessy [1031]	Object
6269	Mr James Neagle [3096]	Object
6288	Mr Steve Ashman [3161]	Object
6295	Mr Shayne Wilford [2132]	Object
6301	Mr Shayne Wilford [2132]	Object
6424	Mr Malcolm Butchart [3385]	Object
6498	Mrs Eve Owen [3609]	Object
6656	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6974	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

A total of 74 duly made representations were submitted in respect of Key Site 3 - Land at Readers Way, Rhoose, by 53 individual representors. This included 1 representation of support, 5 comments and 68 objections. It should be noted that some representors submitted more than one representation in respect of the site. Duplicate representations have only been counted once, but if representations made different points, these have been counted separately.

The statutory consultee response from Natural Resources Wales (NRW) and Dwr Cymru Welsh Water (DCWW) has been addressed first. As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

The key issues raised were in relation to highway capacity, highway safety, poor active travel and public transport, flooding and drainage and infrastructure capacity (including education and healthcare). Concerns have also been raised about biodiversity, the loss of a

green wedge, the loss of agricultural land and potential other sites that could be used as alternatives. Further comments were made on housing density, affordable housing and wider housing need, the impact on and from Cardiff Airport and residential amenity.

It is noted that a number of background documents for each Key Site were made available as part of the consultation and where relevant the Council's response to representation makes reference to this evidence.

STATUTORY CONSULTEE RESPONSES

6656 – Natural Resources Wales

- 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.

Council Response

A Great Crested Newt (GCN) survey was prepared by the site promoters. This surveyed three ditches within the site boundary itself, plus Readers Way Pond, which has historically been a known breeding pond for GCN. The survey identified a negative result for GCN eDNA in two of the ditches on site. The third could not be surveyed as it was dry. Water samples could not be collected at the pond due to its overgrown nature with the surveyor concluding that it was not likely to sustain a breeding population.

Notwithstanding the findings of the survey, it is the view of the Council's ecologist that where a species that habitually uses the same site year on year, such as GCN, then the site would still be considered to be protected. As GCN are a long-lived species, the absence of suitable breeding conditions does not negate the ability of the site to support a GCN population in the future. Many individuals will still be present and will still migrate back to the pond to attempt to breed. Therefore, in order to conclude that the pond is not suitable for GCN, survey over several years would be required to demonstrate that GCN interest is no longer present. In this respect, the burden of proof is on the applicant to show that the pond is not used by GCN. The Council therefore considers that a precautionary approach should be taken and that appropriate mitigation will be required.

It should be noted that the Council is working with the Vale Nature Partnership to manage the pond with the aim of restoring it to its former condition. Two management sessions have already been undertaken, and more are planned for this winter.

The Council have met with the site promoters and NRW to discuss how the Masterplan can be adapted to respond to the comments made by NRW. It was agreed that there is scope to

include a woodland corridor along the eastern edge of the site in order to provide a suitable terrestrial habitat that connects to the countryside beyond.

Following the meeting, NRW advised that the following measures will be required to ensure that the site is able to provide suitable habitat and long-term management for GCN:

- Provide a minimum 20 metres wide corridor along the eastern side of the site.
- Locate the ponds in the north further away from the development and playing fields.
- Fence the ponds to prevent public access so they can be managed for GCN as opposed to being part of any public open space.

The site promoters have confirmed that they can accommodate the provisions without reducing overall dwellings numbers on site, although a minor change in the residential mix will be necessary. It is agreed that these requirements should be shown on the indicative plan in Figure 15 and referenced in the key site policy and Appendix 2.

It is recognised that this is in close proximity to the airport so consultation has taken place with Cardiff Airport who have agreed in principle to the inclusion of a woodland corridor in the area, subject to trees being no higher than others in the area.

Whilst the layout identified on the masterplan would need to be reconfigured to accommodate the corridor, it is considered that this can be achieved without affecting the number of units that can be delivered on site.

It is recognised that there will be a requirement for updated surveys to be undertaken at planning application stage.

Proposed Change

Under Key Site Policy Green Infrastructure, Recreation Spaces and Biodiversity amend the final bullet point as follows:

~~The provision of a pond that holds water and connected green infrastructure close to Readers Way Pond is required to provide~~ **In order to provide** an appropriate **terrestrial** habitat for great crested newts**, a minimum 20 metre wide corridor must be provided on the eastern boundary of the site to provide a link to the wider countryside. Ponds should be provided in the north of the site. These should not form part of the open space and should be fenced and managed for great crested newts.**

Update the Indicative Plan for KS3 to show the GCN corridor and additional ponds to the north of the site.

6972 - Dwr Cymru Welsh Water

- Water Supply - A hydraulic modelling assessment (HMA) will be required. A 9” diameter watermain crosses the site.

- Wastewater - A hydraulic modelling assessment (HMA) will be required. A 150mm diameter foul sewer crosses the site.
- Wastewater Treatment Works - Cog Moors WwTW has capacity to accept foul flows from the proposed development.

Council Response

Dwr Cymru Welsh Water (DCWW) comments noted. These are currently reflected in the Infrastructure Plan (BP44) and Appendix 2 of the RLDP.

INDIVIDUAL RESPONSES

Rep 5919 – PMG Development Ltd (Ms Philippa Cole) - Support

- The allocation of Readers Way is supported by the promoter and the site owners. The change to the indicative plan more accurately reflects the Masterplan submitted by the site promoters - reflecting the intention that Readers Way would provide the principal access and that Celtic Way would only be used as a secondary access. There will be no through route on the site that could be utilised to by-pass Fontygary Road.

Council Response

The site owners and promoter's support for the allocation is welcomed, and the confirmation regarding the proposed masterplanning and access arrangements is noted.

COMPOSITE RESPONSE

OBJECTION/COMMENTS

Issue – Highways Capacity

- Concerns of congestion on the road into Barry with Weycock Cross roundabout over capacity which this site, and other sites, will exacerbate.
- Issues regarding the Fontygary traffic light junction capacity and width.
- Fonmon Road is not suitable for additional traffic.
- Transport Assessment and traffic counts are flawed and outdated and only conducted for 450 homes rather than the updated 520.
- Transport Assessment does not take account of seasonal peak traffic from the leisure park and local pub or other RLDP key sites.

- The development will lead to another 700-1,000 cars on the road as most dwellings have more than one car.
- Suggestions to look at roads north of the site and take traffic through the bypass instead of through Rhoose and limit Celtic Way and Readers Way access points to active travel only.

Council Response

The Council acknowledge that the proposed RLDP housing allocation at Readers Way, alongside sites located at Barry and St Athan, have the potential to increase traffic flows along the roads in the Vale of Glamorgan. Accordingly in preparing the Deposit Plan, the Council has sought to identify the potential impacts and identify mitigation measures that will be required by the site promoters to contribute towards addressing these issues.

Strategic Transport Assessment

In considering the traffic implications associated with Key Site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of development proposals on the strategic transport network and mitigation measures. In addition, the STA is supplemented by evidence from site specific Transports Assessments. The full assessment is set out in background evidence documents BP14 Strategic Transport Assessment – Stage 1 and BP14A Strategic Transport Assessment – Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a comprehensive review of the baseline transport conditions in the Vale of Glamorgan and examines the existing transport infrastructure and its current operational state, including the strategic highway network using various data sources.

The Stage 2 STA comprises a series of technical notes on the Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation and Cost Estimation and Funding Mechanisms.

The STA utilises the South East Wales Transport Model (SEWTM), which is owned by the Welsh Government and managed, maintained and updated by Transport for Wales. The model, which covers the whole Cardiff Capital region area, has been designed specifically to assist local authorities to identify the cumulative impacts of strategic housing allocations on specific junctions on the strategic highway network. It includes two forecast scenarios:

- 2036 Base Scenario – representing 2022 SEWTM base flows factored to 2036 using TEMPro derived growth rates, excluding traffic from the RLDP strategic housing sites.
- 2036 RLDP Scenario – representing the 2036 Base flows plus traffic associated with identified strategic housing sites.

The Stage 2 STA that reviews the highway and junction impacts of the proposed land allocations in the Deposit RLDP, is conducted using the 520-unit figure for Land at Readers Way. Additionally, the study utilises a recognised base model, and therefore the Council is of the opinion that traffic data in the STA is comprehensive and fit for purpose.

Technical Note 5 of the STA provides a detailed assessment of the forecasted cumulative impact of the proposed RLDP housing allocations on 17 specific highway network junctions where the SEWTM outputs together with professional judgement and local knowledge indicated that the cumulative impact of RLDP sites would have a material effect on highway safety and operation.

The strategic data on the cumulative impact of RLDP sites showed that Junction 16 (Weycock Road, Port Road West/Pontypridd Road roundabout) was forecast to increase traffic by 7.2% in the AM peak and 12.2% in the PM peak and was deemed to warrant further consideration in the more detailed modelling.

Following detailed modelling, Table 1 of Technical Note 6 indicates that in the baseline scenario 2036 (without RLDP traffic) the capacity of the Weycock Road/Port Road West/Pontypridd Road roundabout would be nearing practical capacity, with maximum AM and PM flows of 88%. When the cumulative impact of the RLDP sites is factored in, this increases to 102% in the AM peak (i.e. over capacity) and 97% in the PM peak. This represents a worsening of performance compared with the 2036 Base scenario. The STA concludes that there will likely be a material adverse impact at this junction, and mitigation is therefore considered necessary.

To address the impact of additional traffic flows, Technical Note 7 of the STA identifies potential highway mitigation measures for Weycock Cross. Two mitigation options were considered: Option A, maximum widening while retaining the roundabout, and Option B, partial signalisation. Option A comprises targeted widening of the roundabout entries, with localised lane-marking modifications to improve entry width, provide extended approach lanes and increase circulatory capacity. Option B would introduce MOVA-controlled signals on the A4226 eastern and western arms in addition to the widening works.

The Option A assessment in Technical Note 7 shows that widening the junction and improving road markings could allow the junction to operate within theoretical capacity during the AM peak. The modelling demonstrates that the highest ratio of flow to capacity would decrease from 88% in the 2036 Base scenario to 78% in the 2036 RLDP scenario with the mitigated junction layout, with corresponding reductions in average delay and queue lengths across all approaches. Overall average delay at the junction is forecast to reduce, indicating that the scheme has the potential to provide measurable capacity and delay benefits if progressed to detailed design and implementation.

The PM peak results indicate that the Option A widening concept would maintain stable operation across most approaches at Weycock Cross, although the A4226 east arm would continue to operate close to capacity. This reflects localised queuing during the busiest periods rather than overall junction failure. All other approaches remain comfortably within capacity. Overall junction delay increases only marginally, indicating that the scheme could accommodate RLDP traffic growth without materially degrading performance.

The indicative cost of the scheme is detailed in the BP14A Strategic Transport Assessment – Technical Note 8. The cost estimates assume that the developer of key site HG1 KS1 Land at North West Barry will deliver those improvements directly related to their development.

Improvements to the junction itself are anticipated to be funded by Section 106 contributions, which the Council is already in receipt of for strategic highway network improvements in the Barry area, together with additional contributions from RLDP allocated sites.

The mechanisms for securing these monies will be via S106 planning contributions at the planning application stage. The Deposit RLDP Key Sites Policies KS1 to KS5 specify a requirement towards off-site contributions for improvements to the strategic highway network. Policy TR1 Transport Proposals identifies strategic highway improvements which include improvements to Weycock Cross Roundabout. Finally, the Deposit RLDP Infrastructure Plan (BP44) sets out the infrastructure requirements for each proposed housing allocation in the plan including Readers Way. This is also set out in Appendix 2 of the Deposit Plan.

The STA also considered A4226/Port Road (the Dragon's Tail roundabout). In the 2036 scenario with background growth and RLDP strategic housing sites factored in, the roundabout junction is forecast to operate within theoretical capacity.

On the basis of the above, the Council is of the view that it has fully taken into account the strategic highway implications of the proposed housing allocations within the plan, and the Deposit Plan sets out clearly the requirements for each site to contribute towards mitigating the impacts of development, which will be secured through legal agreements at the planning application stage. The costs associated with each key housing allocation have been accounted for in the site-specific viability assessment undertaken and are considered both appropriate and deliverable as set out in Background Paper 42A Independent Financial Viability Assessments of Key Sites.

Site-Specific Transport Assessment

In addition to the Strategic Transport Assessment (STA), a draft Site-Specific Transport Assessment (TA) has been prepared by SLR Consulting Ltd on behalf of the site promoters. The scope of the TA was agreed with the Highways Authority. It is noted that the TA modelled 450 dwellings (the notional capacity of the site identified at the Preferred Strategy stage) rather than the increased figure of 520 dwellings. Consequently, an updated TA will be required to support any future planning application.

The draft TA considered seven junctions on the local highway network. Junctions anticipated to experience a 5% or greater impact as a result of development traffic were then subject to more detailed junction capacity modelling. This modelling included the Fonmon and Fontygary Road signalised crossroads, about which representors have specifically raised concerns. The draft TA concluded that this junction would operate within its theoretical capacity in a future scenario that includes development traffic. Overall, the Practical Reserve Capacity (PRC) remains positive at 54.7%, indicating that the additional development traffic would remain well within the operational capacity of the junction. While the modelling is based on a lower number of dwellings (450 rather than 520) and will therefore need to be revisited at the planning application stage, the positive PRC at the junction is noted. It should be noted that the conclusions in the TA relate to the capacity of the junction. If

improvements are required to the Fonmon/Fontygary junction or any other section of the highway, such as Fonmon Road, from a highway safety perspective once detailed proposals are known, this will be considered as part of the planning application.

The other junctions modelled were Rhoose Road Roundabout, Pentir-y-De Roundabout, Port Road Roundabout, Dragonfly Drive Roundabout, and the B4265/Fontygary Road priority junction. All were concluded to operate within their theoretical capacity in a future scenario that includes the proposed development.

Weycock Cross Roundabout was not specifically considered within the site-specific TA, as the forecast impact of the development was below the 5% threshold that would trigger further modelling. However, it has been considered as part of the cumulative assessment within the STA, and the Readers Way development is expected to make a financial contribution towards any cumulative mitigation measures identified.

The reference to 700 to 1,000 cars does not represent the number of vehicles that would using specific junctions or roads at any one time. Car ownership is different from peak-hour trip generation. Household travel patterns vary, not all residents travel during the highway peak hours, and not all journeys are made by private car.

Alternative Accesses

In regard to access points and directing traffic from the site out north. The existing roads north of the Readers Way site including Port Road, Fonmon Road and Rockshead Lane, are inadequate to support the trips and vehicles generated from the site. Proposals for a new road connecting to the bypass/B4265 is not a realistic alternative due to distance (the B4265 is 1km from the site boundary), the requirement for third party land and cost.

Traffic congestion conclusions

At planning application stage there will be a requirement for an updated Transport Assessment and detailed designs will be required for both the site access and any off-site highways improvements. However, the level of detail that is included in the RLDP and supporting documents is considered to be sufficient to justify that in principle the allocation is deliverable and can mitigate against any impacts on the highway network.

Issue – Highways Safety

- Concerns that the proposed access roads are unsuitable in terms of pinch points, parked cars and cars reversing from drives.
- Risk to children crossing Celtic Way to access the playground
- Cars using Readers Way already travel at excessive speeds.
- Objections to a link road between Celtic Way and Readers Way.
- There are a number of unadopted highways in the area.
- The roads are not suitable for construction traffic.

Council response

The proposal has been assessed by the Highways Authority, who did not object to the principle of the development, subject to a robust TA and active travel improvements. They indicated that a development of this nature and size would need to ensure that two access points were achievable, from both Celtic Way and Readers Way.

It is acknowledged that some local roads experience on-street parking and narrowing of the available carriageway width. However, the presence of on-street parking along sections of the access route does not, in itself, demonstrate that the road is unsuitable to accommodate development traffic or that the proposal would result in an unacceptable impact on highway safety or capacity. The key consideration is whether the development would generate a level of traffic that would result in severe congestion, materially worsen highway safety, or prevent satisfactory access being maintained. The Highway Authority have not objected on these grounds, although it is noted that further detailed information would be required at planning application stage.

The location of a playground in close proximity to Celtic Way is acknowledged. The safety of pedestrians, particularly children, is an important consideration in the assessment of any development proposal. At planning application stage, when details on the number of vehicles movements using the Celtic Way junction are known, consideration will be given to any highways safety issues that may be necessary, such as signage, pedestrian crossing facilities or traffic calming measures, should these be required.

There is no evidence currently available to suggest that the proposed access, by virtue of its proximity to the play area alone, would result in an unacceptable impact on highway or pedestrian safety. The local highway network is already required to safely accommodate interactions between vehicles and pedestrians in a variety of settings, including locations frequented by children. The planning process provides mechanisms to ensure that any new access arrangements maintain appropriate safety standards.

The concerns about speeding traffic on the existing highways network are noted. However, this is related to driver behaviour rather than being directly related to any development on this site and is more appropriately addressed through separate measures such as enforcement or traffic interventions.

The high-level indicative masterplan for the site identifies that the site will be accessed via a primary access point off Readers Way and a secondary access point off Celtic Way. The exact road layout, including the number of properties that would be potentially served by each proposed access, as well as whether the highway would be a 'through road' between Readers Way and Celtic Way, is a detailed matter that would be considered at future stages of the development process.

Both Celtic Way and Readers Way are adopted highways.

The routes used by construction traffic will normally be controlled at planning application stage through a planning condition requiring a Construction Environmental Management Plan (CEMP), which will set out detailed measures to manage construction impacts.

Issue - Poor Active Travel and Public Transport

- Poor access to public transport which encourage use of private vehicles
- Trains only run once an hour and are packed at peak times that cannot take additional people
- The bus to Cardiff is not direct and takes over an hour and a half to get there, only running one service an hour and is unable to take additional people.
- Concerns that the Readers Way development combined with other developments at Model Farm and Aberthaw will push transport systems beyond their capacity.
- Public transport is over a mile away and cannot be reached in 15 minutes in the case of the elderly and disabled. Residents will therefore use their cars anyway.
- Active Travel measures are needed to Barry and Llantwit Major.
- Roads to the site lack continuous footpaths and are narrow, busy and unsafe for pedestrians and cyclists.

Council Response

The Deposit Plan sets out the requirements for the provision of active travel routes for each of the housing allocation, as reflecting the plan's objective to "Promoting Active and Sustainable Travel Choices". In respect of Land at Readers Way, the policy text for KS3 specifically requires contributions towards off-site sustainable transport measures including specifically active travel links to Rhoose station and along Fontygary Road and Fonmon Road. The Deposit RLDP Infrastructure Plan (BP44) also specifies that contributions shall be sought for the enhancement of active travel and public transport improvements.

In respect of comments regarding accessibility of the site to Rhoose station, to inform the RLDP strategy, the Council has utilised Transport for Wales isochrone maps for both walking and cycling to illustrate accessibility to rail services within settlements served by existing or proposed services. The maps provide approximate travel time distances of 5-, 10-, 15- and 20-minutes for both walking and cycling (See Background Paper 18 Appendix 3).

Rhoose has one station that also operates as the designated station for rail travel to Cardiff Airport. The isochrone map for Rhoose station indicates that Land at Readers Way is either a 10–15-minute or 15–20-minute walk depending on what area of the allocation the measurement is taken from. Likewise, it is also a 5-10 minute cycle journey. It is recognised that not necessarily all residents will be able to walk or cycle from the site to the station in these timeframes and the RLDP does not mandate that future residents of the site should only travel by sustainable modes.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two

trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

The introduction of additional rail services at Llantwit Major and Rhoose will improve integration with the bus service.

Rhoose is served by Service 304 which provides approximately hourly services to Llantwit Major in one direction and Barry and Cardiff in the other. It is recognised that time it takes the service to do its full route is extensive. The Council will continue to liaise with bus operators in regard to the delivery of their services. New development in Rhoose will generate a population increase, increasing the base of potential bus users, assisting with the sustainability of local services. This is also the case for new development at Aberthaw, Model Farm and Land off Port Road, which will create additional transport need.

It should be noted that the Council is currently considering tenders for 3 new rural Vale services. Service V3 Cowbridge to Barry may also serve Rhoose.

The Council shall ensure that future development will provide improvements to active travel and enhance accessibility to public transport and active travel. An assessment of the most appropriate and convenient active travel routes shall be undertaken at the planning applications stage, where further detailed site master planning shall enable the identification of active travel improvements within and surrounding the site. This may include but not limited to upgrades to existing and new pedestrian access and active travel measures for walking and cycling. It is also noted that the site will benefit from the Council's proposed active travel improvements between Weycock Cross roundabout and the Dragon's tail roundabout in Rhoose, which are being progressed by the Council. This would connect to the existing Active Travel route between the Holiday Inn and Rhoose. Additional improvements to sustainable transport shall also be explored and appropriate contributions secured in the line with the Council's planning obligations standards.

With regard to comments about roads to the site lacking continuous footpaths and are narrow, busy and unsafe for pedestrians and cyclists, Readers Way is considered to be of a sufficient standard to accommodate anticipated traffic flows without risk to cyclists and pedestrians. There are also adequate active travel routes connecting Celtic Way to

Fontygary Road without users having to navigate Fonmon Road. However, HG1 KS3 in the Deposit Plan requires 'A contribution towards off-site sustainable transport measures in the area, including improving Active Travel links to Rhoose station and along Fontygary Road and Fonmon Road'. The development can be designed to enhance the public rights of way through Rhoose notably running through the site north connecting to Port Road which should also include the widening of Port Road improving the active travel routes available.

It is considered that the location of the site and proposed active travel improvements accords with the intentions of Planning Policy Wales and the Active Travel (Wales) Act as the site is in a location where residents can choose to travel by means other than the car.

Issue – Flooding and Drainage

- Existing drainage issues at Readers Way that have not been addressed since its construction, more housing will exacerbate existing flooding.
- Flooding occurs on Readers Way, Celtic Way playing fields, Llanmead Gardens and from the Readers Way pond when it rains not just in extreme events.
- There are no SuDS provided.
- Recent rainfall has caused flooding under the railway bridge at Fontygary and Fontygary Junction releasing sewage onto the road.
- How will Section 106 monies be ringfenced to provide tangible drainage before development commences.
- Evidence base lacks full winter groundwater monitoring. There is a failure to apply the mandatory factor of Safety 10.0 to borehole infiltration rates as mandated by SAB for high-risk sites. The amber assessment for this site should be elevated to red.
- No evidence that surface water, SuDS capacity or downstream drainage have been properly assessed and cannot show development would not increase flood risk to properties downhill.
- Increased flood risk will cause an increase in home insurance prices and higher claims.
- Local Topography creates flood risk that cannot be fully mitigated at plan stage.
- A single drawing by Cambria Number P01 is not sufficient evidence and is not complete.
- Attenuation basins will create drowning hazards, bring high risk of litter and vandalism and attract midges and rats. How could they be safe, who would maintain them?
- Drainage alongside existing properties may flood homes.
- NRW shows surface water flooding in surrounding streets, no exceedance routes can be guaranteed and so it cannot be demonstrated that water will be directed away from homes.
- Health risks associated with sewage overflow and a new sewage system is required.

Council Response

In preparing the Deposit Plan, and in the assessment of the site at Readers Way, the Council has consulted Dwr Cymru Welsh Water (DCWW) to identify existing water and mains sewage capacity issues associated with each proposed development, including the capacity requirements for the site.

DCWW has identified that the site at Readers Way falls within the catchment area of Cog Moors Wastewater Treatment Works which has the capacity to accommodate the domestic foul flows from this site. The Council has consulted Natural Resources Wales in respect of the site, and no concerns were raised in respect of flood risk.

The site is not located within a flood risk zone for river or sea flooding. There is one very small pocket of surface water flooding towards the northeast corner of the site which is also within the area of the site being retained as public open green space. Ultimately the Lead Local Flood Authority (LLFA) has not identified a level of surface floodwater risk that would, in principle, preclude the allocation of Readers Way. No site-specific technical assessment or hydraulic modelling from surface water run-off has been undertaken by the LLFA as part of the development plan preparation. At plan-making stage, consideration is limited to whether available strategic evidence identifies flood risk constraints that would also preclude the principle of the allocation of the site at Readers Way. Detailed assessment of potential impacts on existing properties is also undertaken once a site a layout is confirmed at planning application stage.

Detailed considerations of matters such as future rainfall allowances, exceedance routing, climate change impacts and potential effects on existing homes are normally undertaken at the planning application stage, when additional information is available and confirmed including the site layout and finished drainage design. Therefore, the RLDP will require any future planning applications upon this allocation to be supported by an FCA and a detailed drainage strategy.
In respect of concerns regarding full winter groundwater monitoring, borehole infiltration rates and detailed ground investigations, these are technical matters to be addressed at the detailed planning application and SAB stage, rather than through the RLDP evidence base. The current amber site assessment correctly reflects that future drainage plans will require careful engineering solutions, rather than presenting a definitive constraint that would warrant a red rating.

The Deposit Plan concept plan for the site identifies indicative areas of Sustainable Urban Drainage System (SuDs) infrastructure to manage potential surface run off. This has been informed by a preliminary drainage strategy which has been undertaken for the site and made available as part of the deposit plan consultation. This strategy identifies measures for managing surface water within the site. In this regard, as part of any future planning application submitted on this site, the Council's Drainage Team and Natural Resources Wales will have to be fully satisfied that the drainage and flooding measures proposed are sufficient to deal with the associated risk prior to any development taking place.

Furthermore, since 2019 provision of SuDs have been required in Wales to assist in achieving sustainable development in respect of flooding and drainage on new

developments. This process is administered by the Council through the SuDS Approval Body (SAB) and they must approve a SuDS scheme before development can commence. The use of SuDS mimics natural drainage, managing surface runoff at or close to the surface and as close to its source as practicable, controlling the flow (volume and rate of runoff) and providing a range of additional benefits.

The outcome of this is that issues associated with flooding and drainage should be dealt with on site and prevent any detrimental offsite impacts. The SAB approval process requires a SuDS design compliant with the Statutory Welsh National Standards for Sustainable Drainage Systems. Standard S2 includes, among others, a requirement to mitigate any increased flood risk to people and properties downstream as a result of development. The design, safety and maintenance of SuDS including attenuation features is also governed by these standards. They require that SuDS are designed to maximise amenity benefits and Standard S4 requiring that surface water management systems incorporate appropriate landscaping and clear signage indicating the function of these features to others. As drainage systems that are well-designed in line with these standards there is intended to be little to no risk of drowning or hazards to pedestrians anywhere. The standards also require that a Maintenance Plan is submitted as part of the SAB approval which addresses maintenance for the systems to function, for management of vegetation and adaptation of the system if its performance does not meet design criteria.

Most reports of flooding around Celtic Way and of rear gardens backing onto fields have tended to be related to a lack of maintenance or blockage of existing nearby land drains. The Council's drainage team have undertaken investigations of various land drainage and surface water systems in this area and have more surveys planned to help inform any future discussions about surface water flood risk.

Accordingly, the Council is of the opinion that appropriate measures are in place to ensure that development of the site shall only proceed once detailed surface water and drainage mitigation measures have been identified and approved by the Council.

In regard to the impact of development on home insurance premiums. This is not a material planning consideration that can be addressed through the RLDP or the planning application process. Insurance pricing is determined by insurers based on their own risk assessments and criteria. However, the response as provided above ensures development does not increase flood risk to existing or future residents on or off site. Development should be appropriately designed and mitigated in accordance with the requirements as outlined.

Issue – Education capacity

- Local schools are at or over capacity.
- There is only secondary school education is in Cowbridge which is at capacity as well as Whitmore School.
- There is no current comprehensive school
- Rhoose Primary is full as well as Cowbridge Secondary School and South Point only has capacity for 90 more pupils so where will all the new children go.

- Has the authority really looked at the real cost of additional spaces and expect the developer to cover the cost?

Council Response

The Council acknowledge that new development may require the provision of additional supporting infrastructure to mitigate the impact that new development may have. In this regard in preparing the Deposit Plan the Council has undertaken an assessment of the likely impact of the proposal. The Infrastructure Plan accompanying the Deposit RLDP sets out the infrastructure requirements for each site, and these requirements are reflected within the Deposit Plan Policies. The cost to the developer for this additional infrastructure has been accounted for within site specific viability testing to ensure that the requirements can be supported by the development, as set out in Background Paper 42A Independent Financial Viability Assessments of Key Sites.

In respect of educational provision, the Council has undertaken an assessment of educational need generated by the site in respect of forecast future school places for nursery, primary and secondary education (BP43 Education). This indicates that, based on pupil forecasts, the site would generate the need for 110 secondary and 122 primary school places.

At the primary education level BP43 concludes that there is forecast to be a shortfall in English Medium primary school places at the catchment school, Rhws Primary, as well as ALN education. At secondary school level, the English Medium catchment school, Cowbridge, as is forecast to have insufficient capacity. This is forecast to be sufficient space at denominational and Welsh Medium schools. This position will continue to be reviewed and again, should the situation remain the same, a financial contribution for increased school capacity will be required.

In considering the necessary infrastructure requirements, all key sites have been subject of detailed development viability appraisals. These have included associated infrastructure costs that have been tested to ensure that the development can financially support the contributions towards the identified infrastructure. Education contributions have been factored into the assessment.

Issue – Healthcare capacity

- There are only two doctors and one dentist in close proximity and all are at capacity.
- There is no full-time surgery in Rhoose.
- Many developments over the years have not delivered any new healthcare facilities.
- Supporting information for the viability of this key site should provide the planning solution to deal with the issue of accessing doctors and dentists.

Council Response

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development

and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes Rhoose, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented from April 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

Issue - Other Infrastructure

- There is no supermarket in the village and not enough facilities to sustainably support more homes.
- There is a Tesco with limited stock which would be difficult for elderly people to access.
- There is no foresight for infrastructure based on previous developments
- Rhoose does not have the infrastructure or amenities to support additional homes.
- There are few local jobs.

Council Response

Whilst Rhoose does not have a large retail superstore, it is served by a Tesco Express and Spar as well as local services such as a post office and pharmacy.

The proposal for the development at Readers Way includes areas of mixed use which could include retail unit provision and other facilities. There is also a significant proportion of the site designated as green infrastructure. These uses can improve the availability of amenities and retail available to existing and future residents in Rhoose. The exact use of these proposed land uses will be developed further during the master planning process at planning application stage.

The Council shall also seek appropriate contributions from site developers towards enhancing recreational and community facilities. S106 contributions can be sought from developers towards the costs of providing community and social infrastructure, arising from the development.

With regards to local jobs, the site is in close proximity to the Cardiff Airport and Bro Tathan Enterprise Zone, with current employment opportunities at the Cardiff Airport Business Park and future potential employment opportunities likely to be delivered in the plan period.

Issue - Biodiversity

- The pond at Readers Way has lost its newts due to a lack of Council care.
- There is protection applicable to habitats of bats, otters and many other animals as well as plants.
- The fields and hedgerows provide home to a range of wildlife.
- Rhoose is on a migratory bird route. Losing this will impact residents' wellbeing.
- There is disturbance to a SSSI.
- Development will cause destruction of SINC.

Council Response

A preliminary ecological assessment (PEA) has been undertaken by the site promoters and has been published as part of the site-specific supporting evidence. The PEA has considered the ecology present within and adjoining the site and identified mitigation measures. The main findings of the PEA indicates that the site includes barley crop stubble, emerging grassland, hedgerows, several mature trees and two distinct ditches.

The PEA recommends that boundary hedgerows and mature trees should be retained as part of the local green infrastructure network, with root protection zones implemented around any retained trees and hedgerows. Where the loss of hedgerows cannot be avoided, appropriate translocation or replacement planting will be required. The PEA further recommends that a suitable buffer is retained around the Readers Way Pond SINC to prevent pollution and siltation. A range of biodiversity enhancements are also recommended including the provision of integrated bat and bird boxes, native species soft

landscaping, creation of green corridors and habitat buffers around the site periphery and other measures to increase on-site biodiversity.

The PEA also notes the presence of schedule 1 birds within 2km of the site. It is considered that the habitats of the site are considered unsuitable for any of the identified species to nest and nesting opportunities instead occur at the periphery of the site which are currently retained in the masterplan for the development. Therefore, these as well as those passing on migration routes will keep their suitable spots for nesting alongside other biodiversity enhancements. Additionally, any vegetation clearance that has to be done should be undertaken outside of the bird nesting season of March to August.

The Council has also consulted with Natural Resources Wales (NRW) on this site. In their response, NRW have highlighted the presence of protected species within and adjoining the site, and whilst not raising any objections to the proposed allocation, NRW have highlighted the need to ensure that the Readers Way Pond is provided with a wide corridor from the pond to the wider countryside and that any loss of habitat should be compensated for. It should be noted that Readers Way Pond has recently been subject to maintenance under NRW licence to improve the habitat.

In this respect the indicative concept masterplan for the site included in the Deposit Plan indicates that a large area of the site will be retained as open space, which will provide appropriate land for mitigation measures to be implemented. Nevertheless, the Council shall require further detailed site designs to be provided at the planning application stage that evidence how the site layout has responded to ecological constraints within the site identified through further detailed ecological surveys undertaken.

The development will also be required to comply with national and local policy for achieving Net Biodiversity Benefit and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. In this respect, as a statutory consultee NRW will have oversight of any mitigation measures proposed at the planning application stage to ensure delivery of these objectives.

Additionally, any future development at the site would have to provide a detailed Green Infrastructure Strategy for the site that shall incorporate green infrastructure will also contribute towards delivering a biodiversity net benefit. More detail on this will be determined at planning application stage. Nevertheless, at this stage principles for protection and net-benefit opportunities have been identified as part of the initial site master planning.

The site is not located on or near any SSSI's and therefore no SSSI is at risk of sustaining any damage to species and wildlife as a result of development.

Issue - Loss of Green Wedge, agricultural land and Countryside

- Green space is disappearing and destroying local green buffers.
- This is a greenfield site in agricultural use.
- Building on Green Wedges is restricted and inappropriate.

- The development destroys farming fields producing our own wheat and valuable animal food.

Council Response

Green Wedges are local designations which serve as an urban containment mechanism intended to restrict the spread of built development beyond designated settlement boundaries and allocated development sites. Where designated, green wedges comprise the open areas around, and between, parts of settlements and seek to maintain the distinction between the countryside and built-up areas and prevent urban coalescence.

Planning Policy Wales Edition 12 (February 2024) (PPW) advises that green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust. PPW also advises that unlike green belts which should be protected for a longer period than the relevant current development plan, green wedges where they are proposed, should be reviewed as a part of the development plan review process (paragraph 3.64 refers).

In line with national policy, the Council has undertaken a review of the existing adopted LDP green wedge designations (Background Paper 27 Green Wedges). In reviewing these designations, the Council has utilised the regionally agreed 'Southeast Wales Green Wedge Definition Criteria' Method Statement. This method statement outlines the policy and geographical context for green wedge designations across the region, explores the established methodologies used by local authorities to date and proposes a methodology that can be implemented on a consistent basis across Southeast Wales to assess and refine existing or candidate green wedges, employing an assessment proforma to record and map relevant information.

The methodology entails four stages of assessment, these are

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

When assessed against these criteria, the review identifies that the adopted LDP Green Wedge north of Rhoose that the site lies within plays little or no role in preventing the coalescence of settlements. Therefore, while the distinction from the urban settlement of Rhoose is strong, it is considered that the continuation of the green wedge designation in the location is not justified and has been removed in the RLDP Deposit Plan.

Whilst the character of the countryside will inevitably change in this location the Council shall ensure that the proposed development will integrate with the existing settlement pattern, incorporating green infrastructure to offset biodiversity impacts. It is noted that the Landscape and Visual Appraisal for the site identifies potential opportunities that the development may provide to create a stronger, more coherent and landscaped settlement

edge, and the incorporation of enhanced green infrastructure. Together these landscape interventions provide the opportunity to strengthen the green wedge boundary and improve long-term management of its boundary vegetation.

It is acknowledged that the development would fundamentally alter the character of the land, and in the context of the existing LDP that land is countryside. However, while brownfield land is prioritised where possible, there is insufficient brownfield land (or land in core inner settlement locations) to come close to meeting housing need. Consequently, there are elements of the proposed housing supply that unavoidably require greenfield land and it is unavoidable in those circumstances that the character of the land will change. It is the purpose of the RLDP process to enable submitted candidate sites to be assessed, in order that housing need and growth can be met on the most appropriate sites, where those impacts are managed and minimised as far as possible. The Vale of Glamorgan is located within a National Growth Area in Future Wales, and this RLDP must be consistent with Future Wales.

Accordingly, the Council is of the view that development of Land at Readers Way, the removal of the green wedge from the RLDP has been fully appraised in line with both Planning Policy Wales and the agreed regional assessment methodology.

Furthermore, the preliminary ecological assessment (PEA) undertaken by the site promoters and published as part of the site-specific supporting evidence, considered the land use present within and adjoining the site and identified mitigation measures. The main findings of the PEA in regard to this indicates that the site includes barley crop stubble and sown emerging grassland. The site is also not designated as Best and Most Versatile agricultural land and the council is satisfied that the need to deliver housing in Rhoose is balanced appropriately with the loss of the on site agricultural resources.

Issue - Prioritise Brownfield Land and Alternative Sites

- There should be a greater emphasis on brownfield sites and smaller communities.
- Rural villages of the Vale should have more development.
- There are other more appropriate sites such as RAF St Athan or Llandow for a new settlement.
- The higher cost of developing brownfield sites should not override the impact of greenfield sites on communities and the environment.

Council Response

The identification of sites to be allocated for housing is done through a call for candidate sites during which landowners, developers and other interested parties are invited to submit land for consideration. This was undertaken mid-2022 and a second call for sites was undertaken during the RLDP Preferred Strategy consultation during late 2023 to early 2024.

Where brownfield sites were submitted, they were assessed through the same site assessment methodology as all other candidate sites, having regard to criteria including

sustainability, accessibility, infrastructure capacity, environmental constraints and deliverability. Brownfield sites have been allocated where they have been deemed suitable against the candidate site criteria.

However, as in many local authority areas with significant rural regions., the supply of deliverable, suitably located brownfield land is limited and insufficient to meet the assessed housing need for the RLDP plan period. The Council is required to identify greenfield sites to meet the housing need and the inclusion of greenfield sites is a necessity.

The RLDP's spatial strategy is set out in Policy SP1 as confirmed at Preferred Strategy stage. This is to direct growth towards the most sustainable settlements within the Vale of Glamorgan which are located within the strategic growth are following the transport corridor through the Vale and are served well by existing public transport. Dispersing significant levels of housing development to smaller rural villages would be inconsistent with national planning policy, sustainable development goals as well as the sustainable growth strategy for the RLDP. This is due to these areas having a limited services, facilities and public transport connections that characterise these rural settlements.

Proposals for new settlements such as a new village at Llandow would be contrary to national planning policy which considers that such proposals should only be identified through the Strategic Development Plan process. The former MOD land at St Athan is now the Bro Tathan Enterprise Zone and is allocated for employment.

Issue – Housing Density

- Site should be lower density.
- There shouldn't be an increase in density as the site fails to meet requirements of the Active Travel Act 2013 and PPW.
- Raising the number of homes from 450 to 520 will bring inner city type densities into a small rural community of low-density builds. This also pushes roads beyond their safe design.
- Large high-density housing is at conflict with the existing character and community.

Council Response

Policy BP48 has informed the increased density requirements within the RLDP. As evidenced within BP48, while national policy does not prescribe specific density figures, Planning Policy Wales (PPW) and Future Wales both state that higher densities should be encouraged around urban centres, particularly settlements in growth areas with rail connections.

Future Wales states: *"Planning authorities must plan the growth and regeneration of the National and Regional Growth Areas to maximise opportunities arising from the investment in public transport, including identifying opportunities for higher density, mixed use and car free development around metro stations."* PPW 12 further states that *"higher densities should be encouraged in urban centres and near major public transport nodes or interchanges, to generate a critical mass of people to support services such as public*

transport, local shops and schools." Rhoose sits within the strategic growth area and benefits from rail connectivity, satisfying both criteria.

Since the adoption of the LDP, Rhoose has seen one major housing development, which achieved a density of 52 dwellings per hectare (dph) — albeit on a brownfield site. Across the LDP plan period, primary settlements averaged 53 dph, well above the 35 dph target set out in the RLDP for primary settlements. This demonstrates that primary settlements identified within the RLDP can, and should, aim for net density levels of 35 dph or higher, consistent with Rhoose's position within the RLDP settlement hierarchy.

Additionally, it is considered that the proposed density at Readers Way and for Rhoose is in accordance with the Active Travel (Wales) Act 2013. The Indicative masterplan shown under Policy HG1 KS3 shows numerous active travel routes forming a continuous network across the site linked to existing footpaths and routes in Rhoose. It is also located close to existing bus routes and a train station as covered in the Council's responses to representations made regarding transport and active travel.

It should also be noted that Policy PGD2 -Residential Development Densities, does permit lower density levels where: "*Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area"*. This ensures that settlements are protected from inappropriate density levels where development would be out of keeping with the local area, or where other specific circumstances apply.

Issue - Affordable Housing

- 150 social houses will lead to an increase in people walking past homes.
- Viability should be demonstrated as at 35% affordable housing there is unlikely to be much housing left for anyone else.
- Proportion for low cost/social homes is too high and will bring anti-social behaviour.
- Affordable homes should go elsewhere, such as Cowbridge.

Council Response

The Council's response in regard to the increase and proportion of affordable housing are covered in the response to representations made under Policy SP7 – Affordable Housing Provision. Both market and affordable housing are intended to generate walking journeys that will inevitably pass other people's homes. The RLDP strategy intends to encourage active travel and sustainable transport options as an alternative to making journeys by car. The Council are of the view that increased journeys by foot would be beneficial and in line with the strategy and policies of the RLDP.

There is affordable housing need across most settlements in the Vale of Glamorgan and therefore affordable housing is include in each key housing site to help meet identified need. Affordable housing is being delivered in other settlements including Cowbridge in response to local need. Given the prevalence of affordable housing need in Rhoose, the identification of housing land within the town is fully justified and is in accordance with the RLDP growth strategy objectives.

In respect of potential anti-social behaviour relating, for large developments such as this, the Council formally consult the South Wales Designing Out Crime Officer who provides advise in respect incorporating measure to ensure developments are safe and reduce opportunities for anti-social behaviour. The advise relates to all tenures.

Issue - Housing need and distribution

- Rhoose does not need any more houses
- Who will these house be for?
- Only permit houses to be sold to or used by residents of Rhoose.
- Reduce costs of housing for those that need them locally.

Council Response

New housing is required to meet forecast increases in the population and in household formation. The housing requirement and the assumptions that have informed it are set out in BP7 Housing and Employment Growth Options and BP8 Demographic Evidence. The projection has been derived from a range of information sources.

In relation to housing needs in Rhoose, as of February 2026, the Council waiting list identified that there were 264 persons/households registered on the Council's Housing waiting list (117 in the highest priority need) and some 7,700 in total across the Vale as a whole. The proposed housing allocation at Readers Way shall deliver 35% affordable housing and contribute towards the much-needed housing for those in the greatest need. When allocating affordable homes, the Council priortising those in the highest need with a a local connection in the first instance. The allocation at Readers Way can therefore provide the opportunity to address the housing needs of those on the waiting list in Rhoose.

In addition, the RLDP will seek to ensure that new developments provide for a range and choice of housing types that will assist residents such as young families and older persons to remain within the local community. While it is not possible at this stage to specify the exact occupants of the proposed dwellings, the development would be expected to provide a mix of market and affordable homes designed to meet identified housing needs across the Vale of Glamorgan.

The Council has no direct control over the prices at which market dwellings are sold or let by developers and landlords as these are affected by prevailing market conditions and are outside the scope of the RLDP. The requirement of 35% affordable housing on site will result in homes being made available at below market cost providing accessible homes to those unable to afford houses at market prices.

Issue - Cardiff Airport

- Potential to curtail development of the airport as more houses close to the boundary to object to airport operations.

- Proximity to airport will have health implications for potential residents – noise and air pollution.
- Airport noise pollution will intensify as sound will ricochet.
- Increased flooding from airport runways.

Council Response

Planning Policy Wales requires that noise-sensitive developments in the vicinity of airports is designed and mitigated to an appropriate standard. This means the burden of adaptation and impacts fall on the allocated site and development rather than on the airport and its activity itself. The allocation of Land at Readers Way for residential development would not therefore place any restriction on the current operations or future growth of Cardiff Airport.

A Noise Impact Assessment has been prepared by SLR on behalf of the site promoter. This has been reviewed by the Council's Shared Regulatory Services (SRS) who concluded that the site is appropriate for residential development provided that it adheres to the recommendations and conclusions of the report. The indicative masterplan has been specifically designed provide a green infrastructure buffer between the airport boundary and the built development. In respect of air pollution, no specific concerns were raised by the SRS team.

It is not considered that Cardiff Airport and its existing runways will pose risk of flooding to the site.

Issue - Other issues raised

- Use traditional architecture design codes.
- Impact on residential amenity - construction traffic and disruption.
- The site should be a park not a new estate.
- Conflict with the objectives of the GI Strategy.

Council Response

Use Traditional Architecture Design Codes

The Council does not intend to mandate design codes for the site, but at planning application stage, as set out in Policy SP4, major developments will need to prepare Placemaking Statements which consider placemaking principles.

Residential Amenity Impacts

The protection of residential amenity is a material planning consideration when determining planning proposals. Presently, the masterplans contained with the Deposit RLDP are indicative and further detail work shall be required at the planning application stage, which will include a requirement to incorporate suitable separation distances from existing residential properties, landscaping, and design solutions to protect neighbouring residential amenity, safeguard privacy and reduce visual impacts.

In relation to potential disruption during the construction phase, it is recognised that some temporary disturbance is inevitable with any building works, this will normally be controlled at planning application stage through a planning condition requiring a Construction Environmental Management Plan (CEMP), which will set out detailed measures to manage construction impacts.

Use of the site

The Council is required to provide 7,890 houses over the RLDP plan period and address demonstrated housing need in the Vale of Glamorgan. Through the Candidate Site and Plan preparation process the Council have selected a number of sites it deems suitable for major residential development as the provision must be allocated somewhere.

While the land may be preferred for park space rather than housing, it is necessary to address identified housing need and provide for this on those sites most suitable. Crucially, as the site is currently private land with no public access, development will open this green space to the public. It is noted that a significant portion of the land is intended to be developed as public open green space for use by new and existing residents.

Conflict with objectives of GI Strategy

It is important to clarify that the primary function of the GI Strategy is to provide an up-to-date and comprehensive audit (and maps) of existing GI across the Vale, ecological assets and networks to inform GI Strategies to support the preparation of the RLDP. It draws from the evidence base provided by Area Statements and well-being assessments as appropriate. The Deposit RLDP utilises this to ensure that growth is directed toward sustainable locations while safeguarding high-value natural assets and avoiding habitat fragmentation. The GI Strategy helps to embed GI into the RLDP, while protecting enhancing and increasing the provision of GI across the Vale through good design standards, governance and asset management.

Council Overall Response

Following a detailed review of the representations submitted in respect of Key Site 3 - Land at Reader Way, the Council acknowledges the range and breadth of concerns raised. The Council recognises that the delivery of appropriate infrastructure and mitigation measures will be essential to ensuring that the development is brought forward in a coordinated, sustainable and responsible manner, and these considerations have informed the allocation of the site.

Many of the matters raised relate to detailed design, technical and operational issues that are most appropriately assessed when a planning application is submitted and full development proposals are available. However, for the purposes of plan preparation, the Council is satisfied that there is sufficient evidence to demonstrate that the site represents an appropriate, sustainable and deliverable allocation within the RLDP. The allocation is

considered to accord with the Plan's strategy and strategic objectives and is therefore regarded as sound.

HG1 KS4 LAND AT CHURCH FARM, ST ATHAN

Representation ID	Respondent Name	Representation Type
4471	Mrs Helena Cook [2801]	Object
4497	Mr Simon Parker [2821]	Object
4510	Mrs H Evans [2823]	Object
4512	Mr Gareth Evans [2824]	Object
4525	Mr Bernard Drew [2796]	Object
4591	Mr David Barton [2683]	Comment
4651	Mr K Cooper [2877]	Object
4654	Mr Colin Morgan [2879]	Object
4658	J.A. Woodin [2136]	Object
4659	Mr J Pope [2881]	Object
4686	Mr Colin Simmonds [2797]	Object
4687	Mr Colin Simmonds [2797]	Object
4689	Ms B Coward [2888]	Object
4698	Councillor Stephen Haines [1029]	Object
4699	Francis Camilleri [2892]	Comment
4700	Ms Maxine Levett [698]	Object
4703	Ms Maxine Levett [698]	Object
4704	Francis Camilleri [2892]	Object
4705	Mr Roger Cooper [2893]	Object
4708	Mr Robert Willmot [2304]	Object
4709	Mrs Samatha Hayes [2895]	Object
4710	Mr MSJ Ellis [2896]	Object
4714	Mrs Julie Morgan [1890]	Object
4718	Mr Bernard Drew [2796]	Object
4824	Mrs Katie French [1592]	Object
4895	Mrs Deborah Driver [3007]	Object
4900	Mr Leyton Morgan [3011]	Object
4901	Mrs Pamela Jones [3012]	Object
4904	Mrs Nicola Thomas [3014]	Object
4905	Mr Gareth Thomas [3015]	Object
4912	Dr Tim Render [3016]	Object
4913	Dr Tim Render [3016]	Object
4921	Mrs Sarah Clemo [3019]	Object
4924	Mr Chris Evans [819]	Object
4926	Mrs Sian Stent [3022]	Object
4927	Mrs Sian Stent [3022]	Object
4955	Miss Amy Drew [3038]	Object
4988	Mr Chris Twine [3056]	Object
4990	Mr Gareth Westlake [3059]	Object
4996	Mr Clifton Russell [3064]	Object
5096	Mrs Helena Cook [2801]	Object
5099	Mr Tim Brown [3000]	Object
5282	St Athan Community Council (Mr Roger Eustace, Chairman) [2154]	Object
5353	Mrs Sian Pickett [1569]	Object
5354	Mr Alan Pickett [1482]	Object

5425	Mrs Susan Evans [712]	Object
5555	Mrs Deborah Schmit [3290]	Object
5653	Mr David Entwistle [3264]	Object
5680	Ms Ann Barnaby [1702]	Comment
5851	Mr Jeff Smith [3399]	Object
5869	Mr Daniel Campbell [3404]	Object
5893	St Athan Community Council (Maria Stevens, Proper Officer (Clerk)) [2679]	Object
5899	Mrs Louise Jenkins [2079]	Object
6098	Miss Julia Thompson [2631]	Comment
6121	Ms Ann Barnaby [1702]	Object
6139	Ms Ann Barnaby [1702]	Comment
6171	Mrs Sandra Toker [1575]	Comment
6190	Dorian Davies [1589]	Comment
6193	Dorian Davies [1589]	Comment
6241	Mrs Claire Loxton [3004]	Object
6399	Mrs Doreen Matthews [3570]	Object
6445	Mr Neil Jenkins [2729]	Object
6473	Mrs Melissa Plimmer [3599]	Object
6477	St Athan Community Council (Cllr Sandra Toker) [3601]	Object
6590	Councillor Stephen Haines [1029]	Comment
6634	Mr Andrew Street [3444]	Object
6651	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6657	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Support
6704	Ministry of Defence (Mr Chris Waldron, DIO Assistant Safeguarding Manager) [690]	Comment
6800	Barry & Vale Friends of the Earth [708]	Comment
6975	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7026	St Athan Community Council (Mr Roger Eustace, Chairman) [2154]	Comment
7041	Marion morgan [2413]	Object
7102	Barratt Redrow Homes [2669]	Support
7103	Barratt Redrow Homes [2669]	Comment
7104	Barratt Redrow Homes [2669]	Object
7141	Peter Stone Properties Ltd [1182]	Object
7162	Wig Fach Property Company Ltd [2373]	Object
7204	Mr Tim Brown [3000]	Comment

A total of 79 duly made representations were submitted in respect of the Key Site 4 – Land at Church Farm, by 66 individual respondents, raising a number of issues associated with the development of the site. The issues are summarised below and full Council response to the issues is set out.

It should be noted that some representors submitted more than one representation in respect of the site. Duplicate representations have only been counted once, but if representations made different points, these have been counted separately. Three letters were submitted that did not include the full names and/or contact details of the respondents and it was therefore not possible to register these as duly made representations. However, the issues raised in the submissions reflect those raised by other residents, so the issues have therefore been addressed in the composite response.

The statutory consultee responses from NRW, DCWW and Ministry of Defence have been addressed first. As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

The comments raised by St Athan Community Council have been addressed in the composite response.

The Council has provided an individual response to the representation submitted by Hallam Land Management, which proposes a number of specific amendments to the wording of the site specific policy.

The key issues raised were in relation to the sustainability of the location, the level of development within St Athan, infrastructure capacity, loss of agricultural land, flooding and drainage as well as sustainable transport and highways issues. Concerns were also raised about the impacts on the historic environment, biodiversity, noise and pollution, landscape and village character. Representations also considered that the proposed site was contrary to other policies in the RLDP and national planning policy. Other matters were also raised including delivery thresholds for infrastructure, soundness, master planning and community impact and safety.

It is noted that a number of background documents for each Key Site were made available as part of the consultation and where relevant the Council's response to a representation makes reference to this evidence.

Furthermore, it is worth noting that Phase 1 of Church Farm is currently the subject of a live planning application. As such, the responses relating to this site reflect the circumstances and information available at the time of writing this report. Consequently, certain aspects of these responses may be subject to change as the planning application progresses and further information becomes available. Verbal updates can be provided through subsequent political processes if necessary.

STATUTORY CONSULTEE RESPONSES

6651 – Natural Resources Wales - Comment

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, 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.

Council Response

The comments are acknowledged. The Council notes that similar comments have been made in respect of the nearby allocation of Bro Tathan. Both key site allocations are supported by Preliminary Ecological Appraisals which have informed Masterplans for the sites.

Through the application process, the Council will consider the wider impact on protected species and ensure that the matters raised are appropriately considered, in accordance with the step-wise approach and the green infrastructure strategy.

6657 – Natural Resources Wales

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.

Council Response

Support is noted.

6704 – Ministry of Defence - Comment

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. Policy HG1 KS4 - MOD St Athan (technical safeguarding zone) Development triggering statutory safeguarding criteria:

- Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement

- Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement

Suggested Change

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Council Response

The comments from the Ministry of Defence on the need for statutory consultation if development exceeds 15.2m are noted. It is anticipated that the type of development proposed will be two storey dwellings and low-level apartment blocks. The threshold of 15.2m would relate to building of greater than 4 storeys, which is not the type of development proposed in the indicative masterplan. However, for consistency with other sites and to ensure the matter is given due consideration at detailed design stage, it is recommended that a statement be included in Appendix 2 to highlight this consultation requirement.

Proposed change

Include the following text as a key site issue/constraint at Appendix 2 – Infrastructure Delivery Plan "Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site that exceed 15.2m to ensure that there is no impact on the operation or capability of the defence site or asset."

6975 – Dwr Cymru Welsh Water - Comment

Water Supply - A hydraulic modelling assessment (HMA) will be required.

Wastewater - A hydraulic modelling assessment (HMA) will be required.

Wastewater Treatment Works - Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030, and capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of a scheme at the WwTW.

Council Response

The comments from Dwr Cymru Welsh Water (DCWW) on the need for hydraulic modelling are noted. DCWW had previously made these comments and Appendix 2 Infrastructure Plan reflects this requirement.

INDIVIDUAL RESPONSES

7102 – Barratt Redrow Homes (Turley) – Support

We support the identification of Church Farm, St Athan as a 'Key Site.' The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported.

Council Response

Support is welcomed.

7103 – Barratt Redrow Homes (Turley) – Comment

1. It should be recognised in the Deposit Plan that the Developer Impact Assessment, required to establish the reinforcement works if connecting in advance of the

planned AMP scheme, applies to the wider allocation, with sufficient capacity existing for the first phase of development.

2. Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period..."
3. The phased nature of the development should be recognised when applying placemaking principles. Policy should be amended to require affordable dwellings to be dispersed in clusters of no more than 15 units.
4. The first bullet point under Sustainable Transport and Highways should be amended to read: "A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment."
5. Policy should be amended to reflect that it is not within the developers' gift to guarantee a new pedestrian and vehicular access to St Athan Primary School is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment it is unclear what type of access could be sought (e.g. pedestrian and/or vehicular) and whether this would solely be through Phase 1.
6. The nature of any improvements will be determined through the planning application process. It is important that HG1 KS4 recognises that the need to provide for/contribute towards education facilities will need to be determined at the point of any future planning application.
7. The Policy sets out a number of requirements relating to 'Community Infrastructure.' This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum of land expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required. Whilst the principle of transferring land for the redevelopment/expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent of land required. If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer of land, or a section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.
8. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The policy should also be amended to recognise that training and development could either be provided via a contribution or as part of the development itself.
9. It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.

10. The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Council Response

It is important to note that the wording of the allocation relates to the wider site. As the Phase 1 planning application is currently under consideration, it will be assessed against the Adopted LDP. Whilst the RLDP may be afforded some consideration, it has not yet been adopted and therefore currently carries limited weight in the decision-making process.

In respect of point 1, whilst it is acknowledged that sufficient capacity within the sewer network has been identified to accommodate the Phase 1 development, the requirement for a Developer Impact Assessment to establish the reinforcement works if connecting in advance of the planned AMP scheme applies to the wider allocation.

In respect of point 2, the Council does not consider it necessary to include the word "approximately" before the stated number of homes to be delivered. However, the Council accepts the suggested amendment to remove the reference to a specific number of affordable homes to be provided on the site and instead retain only the required percentage (point 2). This is consistent with the approach taken in the Adopted LDP.

The policy requirement for the affordable units to be dispersed across the development in clusters of no more than 10 units (point 3) is consistent with the Council's longstanding policy as set out in the Council's Affordable Housing Supplementary Planning Guidance. This is to ensure that social rented and low-cost home ownership units blend in with the neighbouring open market housing and is integrated properly across a development, which is especially important on larger housing developments. Therefore, the wording will remain unchanged.

The Council does not consider it necessary to amend the first bullet point under Sustainable Transport and Highways to read: "A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment" (point 4). The site allocation and associated policy have been informed by the Strategic Transport Assessment and site-specific Transport Assessments available to date. The existing wording which reads "A contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network as informed by the Strategic Transport Assessment and site-specific Transport Assessment" provides an appropriate mechanism for identifying and securing any necessary mitigation measures. The Council considers that the intent and effect of the proposed amendment are adequately reflected in the current wording and, therefore, the wording will remain unchanged.

Comments are noted in respect of point 5. The policy wording will be amended so that bullet point 6 reads "A new road through the site to facilitate an alternative access to St Athan Primary School, should this be required."

In respect of point 6, the policy currently requires 'an off-site contribution towards the delivery of additional school places in accordance with capacity requirements within the catchment area.' The Council considers that this wording is appropriate as it reflects the identified need set out in BP43 *Education* and provides sufficient flexibility to address school capacity requirements at the time of any future planning application.

Comments are noted in respect of point 7. This is a detailed matter that will be considered at planning application stage.

An off-site financial contribution towards the provision or enhancement of community facilities in the area will be required from the developer for both phases. The Infrastructure Delivery Plan recognises that the exact level and type of provision will be determined as part of Masterplanning and will account for existing local provision, including any deficiencies (point 8).

The current wording of the policy requires a "a contribution towards training and development for the commercial element of the development on Phase 1." The wording does not specify the form that the contribution must take. The Council therefore considers that the policy affords sufficient flexibility for the requirement to be satisfied either through a financial contribution or through the provision of training and development opportunities directly as part of the development (point 8).

In respect of point 9, the development of the site must adhere to the Placemaking Principles set out in Policy SP4 Placemaking and the criteria in Policy PGD1 Creating Well Designed Places. The wording of the policy currently states that "In accordance with the requirements of Policy CI1, the site must include a number of well-designed areas of useable open space, including informal and equipped play spaces, with appropriate green infrastructure connections between them. A playing pitch will be required as part of the outdoor sports provision requirement on Phase 2 of the development. It is expected that the open space will be delivered proportionately across the two phases of development. Where the requirements cannot be met fully on site, an off-site contribution will be required." This is not considered to be overly prescriptive and ensures that the GI and open space across the site reflects other policy requirements. It is acknowledged that the exact layout of the site would be determine at planning application stage.

The Council notes the comments made in point 10. In response, paragraph 6.80 will be amended to incorporate the following wording, ensuring a consistent approach across all Key Sites:
"The sites at Barry, Rhoose and St Athan that are identified as Key Sites are those that best accord with the principles of the Sustainable Growth Strategy. As part of the production of the RLDP the Council held a serious of Placemaking Engagement Sessions in the communities near the sites which gave local residents the opportunity to inform the illustrative masterplans that accompany each of the Key Sites. **A Masterplan has been prepared for each of the key sites to demonstrate the key placemaking and design**

principles that would apply to each site. Each high-level plan is referenced as 'indicative,' rather than being a detailed site layout. However, it does set out key parameters including which parts of the site are likely to accommodate built development and which are open space and green infrastructure corridors, which will also include areas required to achieve net biodiversity benefit. As the layouts are described as indicative, the detailed masterplans and site layouts will be subject to further consideration and determination through the planning application process. In addition, independent site-specific development viability appraisals have been undertaken to ensure site deliver and the ability of sites to financial support the necessary affordable housing and other supporting infrastructure specified within each Key Site Policy."

Proposed change

To ensure consistency with the Adopted LDP, the Council will remove the reference to a specific number of affordable homes to be provided on the site and instead retain only the required percentage.

The policy wording will be amended so that bullet point 6 reads "A new road through the site to facilitate an alternative access to St Athan Primary School, should this be required." Paragraph 6.80 will be amended to incorporate the following wording, ensuring a consistent approach across all Key Sites:
"The sites at Barry, Rhoose and St Athan that are identified as Key Sites are those that best accord with the principles of the Sustainable Growth Strategy. As part of the production of the RLDP the Council held a serious of Placemaking Engagement Sessions in the communities near the sites which gave local residents the opportunity to inform the illustrative masterplans that accompany each of the Key Sites. **A Masterplan has been prepared for each of the key sites to demonstrate the key placemaking and design principles that would apply to each site. Each high-level plan is referenced as 'indicative,' rather than being a detailed site layout. However, it does set out key parameters including which parts of the site are likely to accommodate built development and which are open space and green infrastructure corridors, which will also include areas required to achieve net biodiversity benefit. As the layouts are described as indicative, the detailed masterplans and site layouts will be subject to further consideration and determination through the planning application process.** In addition, independent site-specific development viability appraisals have been undertaken to ensure site deliver and the ability of sites to financial support the necessary affordable housing and other supporting infrastructure specified within each Key Site Policy."

7104 – Barratt Redrow Homes – Objection

We do not support the current wording and use of "must comply with." Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration and should not be treated as definitive.

The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. The need for and nature of any work required to the Gileston Road/B4265 junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.

Council Response

In all cases, the Council considers that the requirements set out within the allocation are justified by the evidence base and are therefore necessary in planning terms. Therefore, the Council does not support the proposed amendment to remove the use of *"must comply with"*. Retaining this wording is considered necessary to provide a clear and robust policy framework that secures the delivery of infrastructure required to support the development.

Technical Note 5 of the STA provides a detailed assessment of the forecasted cumulative impact of the proposed RLDP housing allocations on 17 specific highway network junctions where the SEWTM outputs together with professional judgement and local knowledge indicated that the cumulative impact of RLDP sites would have a material effect on highway safety and operation. The Strategic Transport Assessment (STA) identifies the B4265/Gileston Road junction as one of the locations where mitigation is required to address the cumulative impact of the RLDP strategic housing allocations. There are multiple proposed development sites in proximity to the Gileston Road junction which are expected to have an impact on its operation. The STA therefore identifies an indicative cost estimate and apportionment methodology so that relevant developments can make proportionate Section 106 contributions towards the junction improvement, based on their relative impact. The requirements of the policy relate to the cumulative impacts of the wider allocation and therefore, the Council considers that it is appropriate that the policy requires that "the junction of Gileston Road and the B4265 must be upgraded to a signalised junction with controlled pedestrian/cycle crossing facilities."

COMPOSITE RESPONSE

<u>SUPPORT</u>

- Delighted to see land safeguarded for a potential new train station/halt with parking in a perfect location.
- Support the measures suggested to minimise additional traffic onto Llantwit Road.
- The planned widening of Gileston Road and the new cross roads by the cenotaph is reassuring.
- Support the principle of providing housing for future generations.

Council Response

Support is noted.

COMMENTS AND OBJECTIONS

Issue - Traffic, Parking and Highway Safety

- Additional 1500-2000 vehicles on already narrow, unsafe and congested roads will have serious effects on emissions, air pollution and pedestrian and cyclist safety.
- Increased commuter traffic and congestion, especially dangerous at the monument.
- Proposed access as currently designed would cause significant disruption and lasting harm to the village.
- Vehicle access should only be from the B4265 not Gileston Road.
- Please consider access by the Four Cross petrol station as this would have far less impact on the village.
- There should be no vehicular access to or from Gileston Road.
- Increase in speeding traffic and accidents as a result of existing layout on surrounding roads.
- Traffic calming measures needed.
- Roads between St Athan, Rhoose and Barry are already over capacity. These must be upgraded before more houses are built.
- Asking for a contribution is not enough.
- Added pressure on Port Road towards Weycock Cross.
- Impact on traffic movements via B4265 is not fully considered and planned for.
- Potential traffic on Llantwit Road.
- Increased reliance on private vehicles.
- Requires a robust and transparent assessment of cumulative traffic impacts.
- Requires detailed modelling demonstrating that the proposed access arrangements are safe and appropriate.
- Requires a comprehensive Construction Traffic Management Plan.
- Requires clear mitigation measures to improve safety, reduce congestion and promote active travel alternatives.
- Undertake a full traffic and highway assessment and identify safer access arrangements before any development proceeds.
- Public transport experiences the same traffic issues.
- Significant blind bend affecting residents on Gileston Road.
- Introduce clear occupation thresholds tied to delivery of highway mitigation.
- Impact of construction vehicles and construction traffic.
- Increased traffic as a result of retail unit.
- Concerns with off-road parking levels and additional traffic from the centre.
- Move war memorial and put a roundabout on junction.
- Poorly designed road junction by the War memorial.
- Please consider incorporating roundabout access to B4265 shown in phase two into phase one make this the only vehicular access.
- Existing traffic and parking issues along Gileston Road will be exacerbated.
- Must consider health, safety and pollution as a result of increased traffic.
- Increased traffic congestion during school drop off and pick up.
- Much needed new access to the school.

- Even with suggested plans of widening the road, the current road infrastructure is incapable of supporting new development.
- Opportunity to improve junction with B4265.
- Additional access onto B4265 would be on a hill with poor visibility and a blind bend.
- Access should be kept outside of St Athan.
- Access would exacerbate existing traffic and safety issues for residents coming out of Glyndwr Avenue.
- Households frequently own more vehicles than there is allocated by minimum standards.
- Question whether the current approach adequately considers safety, visibility, traffic flow and cumulative impacts when viewed alongside other planned growth.
- Emergency services response time will be affected by increased congestion.
- Proposed junctions are not designed for delivery vehicles.
- Traffic to Barry or Bonvilston backs up either side of Cardiff Airport roundabouts from Rhoose and St Athan.
- Major negative impact on already over capacity road junctions towards Barry and Cardiff.
- Dangerous connection to the B4265.
- Request redesigned access.
- Additional HGV access to the proposed site creates safety concerns.
- The junction where Gileston Road meets the B4265 at the monument was realigned a few years ago to prevent long articulated HGV's heading to Aston Martin.
- Major safety concern for children, elderly residents and pedestrians who rely on these routes daily.
- Visibility at junctions is poor, inadequate pavements and pedestrian crossings, limited street lighting.
- Limited parking provision.
- Traffic calming and road safety measures should be designed into the masterplan from the outset.
- There needs to be a relief built such as a link road to 5-mile lane.
- Transport plans do not make reference to the expected impact of increased volumes of traffic as a result of the proposed supermarket.
- Proposed signals will only increase congestion and pollution.
- Traffic chaos at peak times – Gileston Road is the sole access into St Athan.
- Additional vehicles will create bottlenecks.
- No evidence to suggest roads can accommodate increased traffic.

Council response

The Council acknowledge that the proposed RLDP housing allocation at Land to the west of St Athan, alongside additional sites in St Athan, Rhoose and Barry, have the potential to increase traffic flows with the Vale of Glamorgan. Accordingly in preparing the Deposit Plan, the Council has sought to identify the potential impacts and identify mitigation measures that will be required by the site promoters to contribute towards addressing these issues.

Strategic Transport Assessment

In considering the traffic implications associated with Key Site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of development proposals on the strategic transport network and mitigation measures. In addition, the STA is supplemented by evidence from site specific Transports Assessments. The full assessment is set out in background evidence documents BP14 Strategic Transport Assessment – Stage 1 and BP14A Strategic Transport Assessment – Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a comprehensive review of the baseline transport conditions in the Vale of Glamorgan and examines the existing transport infrastructure and its current operational state, including the strategic highway network using various data sources.
The Stage 2 STA comprises a series of technical notes on the Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation and Cost Estimation and Funding Mechanisms.

The STA utilises the South East Wales Transport Model (SEWTM), which is owned by the Welsh Government and managed, maintained and updated by Transport for Wales. The model, which covers the whole Cardiff Capital region area, has been designed specifically to assist local authorities to identify the cumulative impacts of strategic housing allocations on specific junctions on the strategic highway network. It includes two forecast scenarios:

- 2036 Base Scenario – representing 2022 SEWTM base flows factored to 2036 using TEMPro derived growth rates, excluding traffic from the RLDP strategic housing sites.
- 2036 RLDP Scenario – representing the 2036 Base flows plus traffic associated with identified strategic housing sites.

As the study utilises a recognised base model, the Council is of the opinion that traffic data in the STA is comprehensive and fit for purpose.

Technical Note 5 of the STA provides a detailed assessment of the forecasted cumulative impact of the proposed RLDP housing allocations on 17 specific highway network junctions where the SEWTM outputs together with professional judgement and local knowledge indicated that the cumulative impact of RLDP sites would have a material effect on highway safety and operation. The Strategic Transport Assessment (STA) identifies the B4265/Gileston Road junction as one of the locations where mitigation is required to address the cumulative impact of the RLDP strategic housing allocations. It is therefore appropriate that Policy TR1 identifies the Gileston Road junction as a strategic highway improvement required to support delivery of the Plan.

The STA provides a plan-level assessment of the need for mitigation, based on forecast 2036 Base and 2036 RLDP traffic conditions. The assessment identifies that the junction is forecast to experience capacity constraints and that the cumulative impact of the RLDP strategic housing sites would require mitigation. Technical Note 7 identifies a potential mitigation concept for the junction, while Technical Note 8 provides an indicative cost estimate and apportionment methodology for securing proportionate contributions from relevant sites.

Technical Note 7 states that the strategic sites in St Athan have both presented options for the junction to be upgraded to signal control. This would be expected to include MOVA

control and active travel enhancements. Whilst the existing war memorial represents a design constraint, there is scope for entry width widening and increased approach lane lengths within the adopted highway extents and with a strip of land from Church Farm west.

The TA has modelled the performance of the proposed signalised staggered crossroads layout under the 2036 RLDP scenario. The results confirm that the signalised layout provides sufficient capacity to accommodate forecast RLDP traffic demand while maintaining stable operation. Overall, the proposed signalised junction represents a substantial improvement in operational control and safety compared with the existing priority layout. The design allows for better management of turning movements and provides the opportunity to introduce controlled pedestrian and cyclist crossings via potentially all-pedestrian stage sequences on all junction arms.

There are multiple proposed development sites in proximity to the Gileston Road junction which are expected to have an impact on its operation. The STA therefore identifies an indicative cost estimate and apportionment methodology so that relevant developments can make proportionate Section 106 contributions towards the junction improvement, based on their relative impact.

This approach is intended to support the delivery of development in a coordinated and proportionate manner. It ensures that all relevant developments that impact the junction contribute accordingly, rather than placing the full burden of mitigation on any single site. It also provides a mechanism through which early phases of development can come forward, where justified by site-specific Transport Assessment evidence, while securing contributions towards the strategic junction improvement.

The precise timing, phasing and trigger points for delivery of the Gileston Road junction improvement will be determined through the planning application process. Site-specific Transport Assessments will need to identify the level of development that can be accommodated before mitigation is required, the point at which the junction improvement or any interim measures are necessary, and the appropriate timing of Section 106 payments.

The first phase of the Church Farm development is subject to a live planning application under the current LDP. The developers have stated that this phase has been designed so that it would not prejudice any future improvement works that may be required at the Gileston Road/B4265 junction. This matter will need to be confirmed through the determination of the live planning application, including review of the submitted layout, transport evidence and any land required to deliver future junction mitigation. The Council will need to be satisfied that any development coming forward under the current LDP would not compromise the ability to deliver mitigation required to support the RLDP growth strategy.

The RLDP allocation relates to later phases of development. The precise need, form, design, timing and phasing of any works to the Gileston Road/B4265 junction associated with later development will be considered through the relevant planning application process. This will be informed by site-specific Transport Assessments, detailed junction modelling, design

development, Road Safety Audit, the scale and phasing of development proposed, and any cumulative development already permitted or implemented.

The inclusion of the Gileston Road junction within Policy TR1 should not be read as requiring the full junction improvement to be delivered before any development can proceed. Rather, the policy provides the basis for securing proportionate mitigation where this is justified by the evidence. The timing and trigger points for delivery will be determined through planning applications and associated legal agreements.

Where justified, relevant developments will be expected to make proportionate Section 106 contributions towards the strategic junction improvement. Any such obligations must meet the statutory tests, namely that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. Where planning obligations are required, a Section 106 agreement will be signed which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

The policy wording therefore provides an appropriate plan-level basis for securing necessary strategic highway mitigation, while allowing the detailed need, form, phasing and delivery mechanism to be confirmed through planning applications and associated Section 106 agreements.

Site-specific Transport Assessment

A site-specific Transport Assessment has been prepared in support of the planning application for Phase 1 of the Church Farm development. The assessment considers the transport and highway impacts associated with both the proposed residential development and the retail store.

In respect of phase 1, the development will be served from Gileston Road to the west of the site, as agreed with the Local Highway Authority. It is anticipated that all traffic generated by the proposed development, including the residential dwellings and proposed foodstore, will access the site via Gileston Road. There will be a need for specific mitigation, and this is currently being considered through the planning application process.

As shown on the indicative masterplan, it is envisaged that vehicular access will be provided from the B4265 during the Phase 2 development. Any future planning application relating to Phase 2 will be supported by a full Transport Assessment to evaluate the transport and highways impacts of the proposed development.

The TA does also highlight the potential for a pedestrian connection from the site to St Athan Primary School, subject to negotiations with the school and Local Education Authority, including the possibility of parents parking in the food store car park. Additionally, the road layout shown on the plans provides an opportunity for a potential link to the adjoining primary school, adjacent to the northeast of the site. This connection is deemed necessary as a new site access to St Athan Primary through the site to replace the

existing sub-standard access to the school from Rock Road is proposed as a requirement in the RLDP Church Farm allocation.

It is anticipated that access for emergency vehicles (fire and ambulance) will be provided from within the internal road layout, and it is anticipated that the proposed dwellings will all be within an acceptable distance for access by emergency vehicles. The emergency services have been consulted on the RLDP and have not objected to the development.

The Council acknowledges concerns raised in respect of HGV vehicles. The TA indicates that food stores typically utilise 16.5m articulated HGV to make store deliveries, and this is supplemented by 10m rigid HGVs, particularly where access restrictions require the use of smaller delivery vehicles. It is anticipated that service vehicles will travel to/from the site via the B4265 (to the south of the site) and will turn right into the site/left out of the site to/from Gileston Road. To enable a 16.5m articulated vehicle to manoeuvre safely along Gileston Road localised carriageway widening is required approximately 15m north of Gileston Road crossroads junction. The local widening minimises the impact on the existing hedge. No service/delivery vehicles will be permitted to travel north of the site access through St Athan, and this will be controlled through the implementation of a Servicing and Delivery Management Plan.

Formal consultation has taken place with Highways in respect of the Phase 1 planning application, and discussions are ongoing regarding highway and road safety concerns.
In relation to potential disruption during the construction phase, it is recognised that some temporary disturbance is inevitable with any building works, this will normally be controlled at planning application stage through a planning condition requiring a Construction Environmental Management Plan (CEMP), which will set out detailed measures to manage construction impacts.

The TA prepared for the allocation at Land west of St Athan confirms that vehicular access from Llantwit Road for 'normal' traffic conditions is not considered appropriate due to the width of the carriageway along Llantwit Road and to ensure it remains appropriate for walking and cycling. When considering the planning application for the adopted LDP allocated site MG2 (2) 'Land at Higher End, St Athan', the Highway Authority response raised no concerns with the suitability of Llantwit Road for accommodating pedestrian movements. Llantwit Road is therefore considered suitable only for active travel movements.

The concerns about speeding traffic in St Athan are noted. However, this is related to driver behaviour rather than being directly related to any development on this site and is more appropriately addressed through separate measures such as enforcement or traffic interventions.

In order to ensure that the development does not exacerbate existing parking issues, there will be a requirement for sufficient parking to be provided on site as part of the development, in accordance with the maximum standards set out in the Council's Parking Standards Supplementary Planning Guidance. The exact requirements will be determined at planning application stage when the size and type of units will be known.

Although the Council acknowledges that the proposed development will generate additional vehicle movements, as identified within the Strategic Transport Assessment (STA) and site-specific Transport Assessment (TA), the spatial strategy seeks to direct growth to locations that benefit from significant employment opportunities and existing or planned sustainable transport and active travel infrastructure. This approach is intended to reduce reliance on private car travel and support a greater proportion of journeys being undertaken by sustainable modes of transport.

Issue – Poor Active Travel and Public Transport

- Fails to meet active travel standards.
- No public transport or active travel routes that can accommodate current yet alone additional population.
- No railway station or a regular half hourly bus service.
- Bus services are infrequent and often cancelled.
- Have to drive to either Rhoose or Llantwit to travel on a two carriage, overcrowded train.
- Hourly bus services cannot be relied on to connect to rail services or employment on time.
- Additional public transport facilities are needed and not covered in current proposals.
- No safe footways or crossing points.
- No due consideration for public transport.
- Further transport assessment and modelling should be undertaken to ensure a concrete, realistic and deliverable plan for public transport is put forward before sites are included in the RLDP.
- Development assumes there is a proposed station, but this has not materialised.
- Station should be built and operational before development commences.
- More effort should be made to link key destinations with the Western Vale through active travel – separated paths not shared use paths.
- Introduce clear occupation thresholds tied to delivery of transport interchange infrastructure.
- Priority should be to support a walkable neighbourhood.
- Relying on active travel is unrealistic given that people commute to Barry and Cardiff.
- Allocation relies heavily on delivery of station and therefore question compatibility with the strategy.

Council Response

In line with the Welsh Government's Active Travel (Wales) Act 2013, the Vale of Glamorgan is committed to providing and promoting active travel routes across the region. The Council has produced maps which contain details of the proposed active travel routes that they seek to deliver over a 15-year period (approved by the Welsh Government in February 2018). Future routes include:

- Walking and cycling route running along the B4256, at the southern boundary of the site.

- Walking and cycling route running along Gileston Road, at the western boundary of the site which will provide a connection to an existing walking and cycling route along Eglwys Brewis Road (north-west of the site), providing convenient access to Llantwit Major.
- Walking routes running along Glyndwr Avenue and Llantwit Road to the west of the site.
- Walking routes along Flemingston Road and Clive Road to the north of the site.

These proposed routes will contribute to ensuring St Athan is a walkable neighbourhood. A combined footway/cycleway has recently been implemented along the western edge of Gileston Road from the Parc Ffern Wen development (to the north of St Athan) to St John's Hill, close to the village centre. This route provides convenient access to the shared cycleway/footway along Northern Access Road/Eglwys Brewis Road and on the B4265 to Llantwit Major Boverton.

The Active Travel (Wales) Act 2013 is supported by Active Travel Act guidance and Part 1 provides design details for making improvements to walking and cycling infrastructure. Although the Council notes comments in respect of the need for separated paths, this guidance must be considered when designing and maintaining active travel routes and related facilities, enhancing provision for walkers and cyclists as part of other highway schemes (including planned highway maintenance works), or when considering the needs of walkers and cyclists as part of new developments, traffic management and road safety schemes.

Whilst concerns with existing public transport services are noted, St Athan is served by bus service 304 linking the site to both Llantwit Major in one direction and St Athan centre, Barry and Cardiff in the other direction. It is recognised that this service only runs approximately once an hour and the concerns about timetabling with the hourly train service are noted. The Council will continue to liaise with transport providers on this matter and opportunities to maximise multi-model travel will be explored. It should be noted that the Council is currently considering tenders for 3 new rural Vale services which may also serve St Athan.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level

crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

The introduction of additional rail services at Llantwit Major and Rhoose will improve integration with the bus service.

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

A Preliminary Feasibility Study was undertaken in 2022 to assess the potential for a new railway station on the Vale of Glamorgan Line at St Athan. This study examined a range of potential locations and considered the opportunities and constraints associated with each site.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

Neither the employment nor housing allocations are considered to be reliant and dependent on the delivery of the station. St Athan is identified as a primary settlement within the Strategic Growth Area, reflecting the range of services and facilities available. Furthermore, the co-location of housing with the employment sites at Bro Tathan and Aberthaw means that the settlement is sustainable in its own right. This aligns with the key objective of the plan to locate new housing, employment, services and facilities in close proximity, thereby reducing the need to travel.

Notwithstanding this, delivery of the station would enhance opportunities for sustainable travel, and its delivery at the earliest opportunity would be supported and would clearly further improve travel options between settlements.

Issue – Sustainability of Location

- Not considered that the site aligns with the strategy of the RLDP.
- Significant number of dwellings to house employees of jobs that do not currently exist.
- No guarantee that people moving into the development will work at Bro Tathan.
- Promotes car dependent growth in a rural location.
- Plenty of open space at Picketson area that could be utilised for housing.
- Alternative brownfield land with existing infrastructure should be considered in the first instance, specifically the land near Aston Martin factory.
- Limited employment opportunities.
- Greenfield development is unacceptable.
- Brownfield alternatives have not been sufficiently explored.

- Re-classify St Athan as a "Minor Rural Settlement" until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.

Council Response

St Athan is identified as a primary settlement within the Strategic Growth Area and should therefore be a focus for new development. The settlement is adjacent to the largest employment allocation in the RLDP at Bro Tathan Enterprise Zone, and is in close proximity to the Employment Regeneration Opportunity Area at the former Aberthaw Power Station. A level of housing commensurate with the area's role as a focus for employment growth is therefore appropriate in order to deliver the key component of the strategy to align locations for new housing, employment, services and facilities to reduce the need to travel. The provision of new large housing developments in St Athan will also facilitate the delivery of additional facilities including retail and community facilities. Therefore, it is not considered appropriate, or consistent with the overall strategy, to reclassify St Athan as a Minor Rural Settlement.

Although the Council acknowledges that the proposed development will generate additional vehicle movements, as identified within the Strategic Transport Assessment (STA) and site-specific Transport Assessment (TA), the spatial strategy seeks to direct growth to locations that benefit from significant employment opportunities and existing or planned sustainable transport and active travel infrastructure. This approach is intended to reduce reliance on private car travel and support a greater proportion of journeys being undertaken by sustainable modes of transport.

The site is considered to be well served by current and future employment opportunities, as it is directly adjacent to Bro Tathan Enterprise Zone, which is identified as a major employment allocation under Policy SP14.1 of the Deposit Plan. The whole site is 338 Ha and it is anticipated that 66.7 Ha of employment land will be delivered on the site in the plan period, creating a significant number of new jobs. This includes several areas that either have planning permission or are subject to a planning application. In addition, a number of businesses are already operating on the site, providing existing employment opportunities.

With regard to alternative sites, the RLDP's housing allocations are guided by a sustainability framework, the local evidence base and the specific candidate site submissions received by the Council. The Council cannot allocate land for development unless it has been formally put forward for consideration by landowners or developers through the candidate site process. While the Council evaluates all potential rural settlements where sites have been submitted, allocations are directed to locations that demonstrate the highest balance of sustainability, accessibility, and infrastructural resilience, alongside local housing need.
In relation to concerns regarding greenfield development, a key component of the RLDP Strategy is "Allowing for regeneration opportunities on previously developed and underutilised land." The Adopted LDP has been successful in terms of bringing forward redevelopment of brownfield land, such as that at Barry Waterfront. The RLDP seeks to prioritise brownfield opportunities over greenfield sites wherever possible and many brownfield sites in the Barry area are allocated for housing (including at Neptune Road,

Hayes Lane and Pencoedtre School). However, even with these allocations, there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth over the plan period and therefore greenfield land will also therefore need to be released.

Issue – Over-development of St Athan

- The village will experience ongoing construction for many years.
- Significant increase in population.
- Settlement boundaries appear to be more mobile than in previous years.
- Overwhelming for the surrounding environment.
- Village is big enough already.
- Each development in St Athan should not be discussed in isolation.
- Too many houses proposed.
- Disproportionate to the existing village size.
- The impact of both developments would be overwhelming and unsustainable.
- Is there a need for the volume of houses proposed?
- Reduce number of proposed houses.
- Over-provision for housing growth in St Athan.
- To add further sites for housing in this location over and above the original provision is considered to be unsound.
- Concern that scale of development does not reflect local need.

Council Response

St Athan is identified as a primary settlement within the Strategic Growth Area and should therefore be a focus for new development. The settlement is adjacent to the largest employment allocation in the RLDP at Bro Tathan Enterprise Zone, and is in close proximity to the Employment Regeneration Opportunity Area at the former Aberthaw Power Station. A level of housing commensurate with the area's role as a focus for employment growth is therefore appropriate in order to deliver the key component of the strategy to align locations for new housing, employment, services and facilities to reduce the need to travel. The provision of new large housing developments in St Athan will also facilitate the delivery of additional facilities including retail and community facilities.

New housing is required to meet forecast increases in the population and in household formation. In relation to housing needs, as of February 2026, the Council waiting list identified that there were some 7,700 persons/households registered on the Council's Housing waiting list across (over 3,200 in the highest priority need). There are over 200 persons/households on the housing waiting list in the ward of St Athan, together with high numbers for the adjoining wards of Llantwit Major and Cowbridge. Furthermore, the Council's latest LHMA indicates that there is a need for 128 new affordable dwellings in the ward, after existing committed sites have been discounted. There is therefore demonstrable need for additional affordable housing in the St Athan area as well as in the wider Western Vale.

It is established that the Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocations for affordable housing.

Where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development. Settlement boundaries have subsequently been adjusted and redrawn where housing allocations have been proposed within the RLDP. All new allocations within the Deposit RLDP have been subject to the Council's site assessment and settlement boundaries subject to boundary review which is set out in BP46.

The sites in St Athan have not been assessed in isolation. The Plan is supported by a detailed evidence base, including transport and infrastructure assessments, which consider cumulative impacts at a strategic level. For example, the identified affordable housing need relates to the ward as a whole, rather than to individual sites. Similarly, the Strategic Transport Assessment (STA) has considered the cumulative impacts of all RLDP allocations on the local highway network and the mitigation measures required. The need for additional school places and enhanced services has also been assessed on a cumulative basis. Many of the representations received during the consultation are relevant to all the sites allocated throughout St Athan. As such, the Council's responses to these comments are broadly consistent across these sites.

Furthermore, the cumulative population growth generated by the four allocated sites in St Athan are expected to strengthen the business case for a transport interchange.

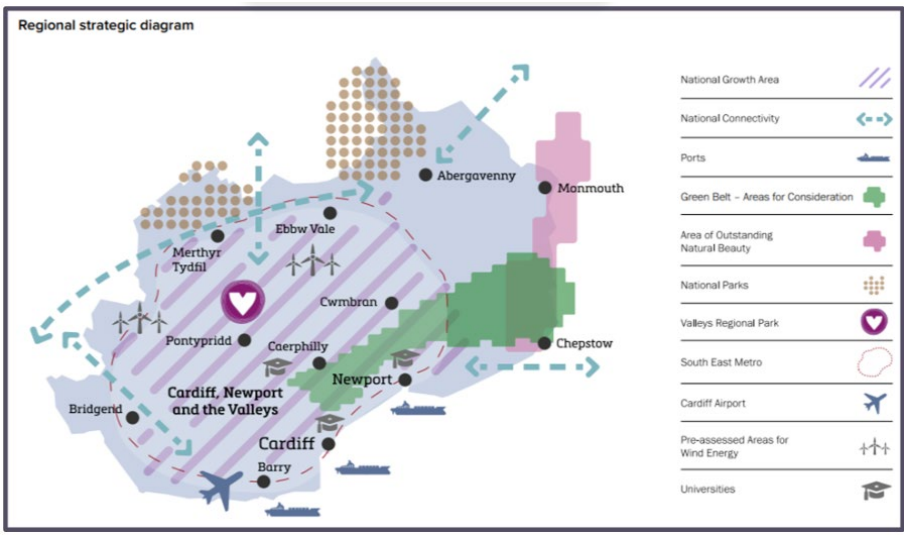
Issue – Conflict with Local/National Policies and Goals

- Future Wales does not place the western Vale within the Cardiff, Newport and the Valleys National Growth Area.
- The proposal conflicts with RLDP Policy SP13 and Policy MD4 in the adopted LDP – ensuring provision, improvement and long-term maintenance of community infrastructure.
- The proposal conflicts with Policy SSC1 in the RLDP – development will fail to provide adequate resources and infrastructure to meet the needs of the additional population.
- The erosion of the "Strategic Gap" between St Athan and Eglwys Brewis violates the principles of Policy SSC1.
- The proposal conflicts with Policy PGD2 in the RLDP – lack of public transport to accommodate higher net densities.
- Conflict with SP7 and SP10.
- The proposal conflicts with Policies SP6 and SSC1 which state that facilities must be in place at the time of the application.
- Difficult to see how development works with Future Wales: The National Plan 2040.
- The proposal conflicts with National and Welsh Future Generations policies.
- The proposal risks conflict with the RLDP's climate goals if there is increased reliance on private cars and if new residents commute elsewhere.
- Contrary to the principles set out in the Well being of Future Generations (Wales) Act with regard to sustainable infrastructure and road safety with the local school and community dwellings.
- The proposal introduces commercial activity and large-scale housing that undermines the principles that countryside policies seek to protect.

- The proposal conflicts with LDP Policy MD1 which requires safeguarding countryside and ensuring infrastructure capacity.
- Approving large-scale housing in a location with limited transport links is inconsistent with national and local planning policies that promote sustainable travel and reduced car dependency.
- Access is contrary to Travel Plan SPG (2018) and Parking Standards SPG (2019).

Council Response

Policy 1 of Future Wales identifies three National Growth Areas, including South East Wales. The spatial strategy diagram supporting this policy identifies that the Vale of Glamorgan is located within the South East National Growth Area, referred to as 'Cardiff, Newport, and the Valleys.' Policy 1 is supplemented by Policy 33, which specifically relates to the Cardiff, Newport, and the Valleys National Growth Areas. This relates to the entirety of the Vale of Glamorgan administrative area, including the Western Vale, as illustrated in the figure below. Strategic and Local Development Plans should recognise the National Growth Area (NGA) as the focus for strategic economic and housing growth, services and facilities; advanced manufacturing; transport and digital infrastructure. The level of growth proposed in the RLDP has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales National Growth Area.



As shown on the RLDP key diagram and explained in Policy SP1 Sustainable Growth Strategy, St Athan is identified as being located in the Strategic Growth Area and it is therefore a location where new housing would be concentrated. In terms of the RLDP's role in protecting greenfield land and safeguarding countryside, under Policy SP3, areas outside the settlement boundaries that are not allocated or protected for a specific use will be defined as countryside. The parcel of land included within Phase 1 lies within the existing settlement boundary defined in the Adopted LDP, and Phase 2 is proposed for inclusion within the settlement boundary as part of the RLDP. Consequently, the site is regarded as forming part of the settlement rather than the surrounding countryside. The allocation of this site accords with the strategy and is not considered to conflict with Policy MD1 in the Adopted LDP or violate the principles of RLDP Policy SSC1. Having regard to the available evidence, the site is considered capable of satisfying the relevant criteria set out within Policy SSC1.

In relation to specific concerns related to the amenity and character principles set out in Policy SSC1, reference should be made to the Council's response regarding Landscape Character and Loss of Village Character.

The site is not considered to be contrary to Policy PGD2 as this policy states that new development with higher net densities should be located in locations served by regular public transport and Active Travel routes or near to services and facilities. St Athan is served by bus service 304 linking the site to both Llantwit Major in one direction and St Athan centre, Barry and Cardiff in the other direction. Although it is recognised that this service runs approximately once an hour, the Council continues to lobby for improvements to multi-modal transport services. It should be noted that the Council is currently considering tenders for 3 new rural Vale services which may also serve St Athan.

The site itself will deliver additional active travel connections and help strengthen the business case for a transport interchange associated with the development. The site is also located in close proximity to the centre of St Athan which provides a range of services and facilities including retail, a library, GP surgeries, pharmacy and post office. Together with the retail unit proposed as part of the Church Farm development, this would help reduce the need for residents to travel outside the local area to access day-to-day services and facilities. In accordance with Policy SP10, there will also be a requirement to make appropriate contributions towards further sustainable transport provision through the planning process.

The proposal is not considered to conflict with RLDP Policy SP13, SSC1 or MD1 and MD4 in the Adopted LDP. The Plan is supported by a detailed evidence base, including transport and infrastructure assessments, which consider cumulative impacts at a strategic level. The Infrastructure Plan accompanying the Deposit RLDP sets out the infrastructure requirements for each site, and these requirements are reflected within the Deposit Plan Policies. The cost to the developer for this additional infrastructure has been accounted for within site specific viability testing to ensure that the requirements can be supported by the development, as set out in Background Paper 42A Independent Financial Viability Assessments of Key Sites.

In transport terms, the Plan is supported by a comprehensive Strategic Transport Assessment (STA), which has identified the infrastructure requirements necessary to support planned growth across the Plan including the St Athan area. This ensures that the implications of development are fully considered at a strategic level, and that appropriate mitigation and improvements are identified.

In addition, the RLDP will ensure that where appropriate, individual development proposals contribute toward infrastructure provision through established delivery mechanisms such as planning obligations (s106), site specific infrastructure requirements and/or phasing and coordination with relevant service and utility providers.

Neither RLDP Policy SP6 or SSC1 state that facilities must be in place at the application. Policy SSC1 does however state that proposals for new development within defined settlement boundaries will be permitted where:

"The proposal benefits from existing infrastructure provision or, where necessary, makes provision for new infrastructure without any unacceptable effect on the natural or built environment."

In line with the policy framework set out in RLDP Policy SP13, where planning obligations are required, a Section 106 agreement will be signed which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

The Council therefore considers that the RLDP provides a robust framework that will ensure that communities across the Vale of Glamorgan including Gileston and St Athan will benefit from improved service provision without unduly constraining appropriate sustainable development or development viability.

In terms of conformity with Future Wales, the representation from Welsh Government concluded that the Deposit RLDP is in general conformity with Future Wales and specific policies within it.

In principle, it is considered that the allocation would accord with the placemaking principles set out in PPW. The detail will be a matter for consideration at planning application stage.

The preparation of the RLDP, including the identification of this housing allocation, has been undertaken in accordance with the Five Ways of Working set out in the Well-being of Future Generations Act, specifically:

- Long-Term: The allocation contributes to meeting identified housing need over the plan period, ensuring sustainable growth and addressing demographic requirements.

- Prevention: By allocating suitable and deliverable sites, the plan helps to avoid unplanned or speculative development and associated adverse impacts.

- Integration: The allocation has been considered alongside wider objectives, including addressing housing need, including transport, infrastructure, environmental protection, and community wellbeing.

- Collaboration: The plan-making process has involved engagement with key stakeholders, including statutory consultees and residents.

- Involvement: Public consultation has been undertaken at multiple stages, providing opportunities for communities to shape the plan and raise concerns.

The allocation therefore reflects a balanced and evidence-based approach consistent with the Well-being of Future Generations Act.
Concerns regarding access arrangements, parking standards and road safety are addressed in the Council's response on highway and road safety matters. The Council also notes that any planning application for the allocated site would be expected to be supported by a Travel Plan and refer to the Council's Travel Plan SPG (2018). Furthermore, the development

will be required to provide sufficient parking in accordance with the requirements of the Parking Standards SPG (2019).

Although the Council acknowledges that the proposed development will generate additional vehicle movements, as identified within the Strategic Transport Assessment (STA) and site-specific Transport Assessment (TA), the spatial strategy seeks to direct growth to locations that benefit from significant employment opportunities and existing or planned sustainable transport and active travel infrastructure. This approach is intended to reduce reliance on private car travel and support a greater proportion of journeys being undertaken by sustainable modes of transport. It is therefore considered that the site strikes an appropriate balance between delivering identified housing needs and meeting climate objectives.

Issue – Education

- Local schools already over capacity.
- Additional pupils will place even more pressure on schools.
- Local people report they are unable to get adequate local schooling.
- No mention of any further resources for Llantwit Major Comprehensive.
- Additional development of Llantwit Major Comprehensive is essential to meet increased needs.
- No clear consultation with local schools.
- St Athan Primary School needs to be extended.
- The proposed expansion of St Athan Primary School lacks a guaranteed timeline.
- Plans should include new school.
- Little option for secondary education due to lack of public transport.
- Introduce clear occupation thresholds tied to delivery of education capacity.
- The development must incorporate direct road connection including high-quality pedestrian and cycle links to the school.
- New access to the school is only 'proposed'.
- Opportunity to address the congestion on the narrow one-way Rock Road at school drop off and pick up times.
- The current access to the school should be closed off for safety reasons and new access point created on the opposite side of the school grounds and incorporated into the boundary between the school and the new development creating a much safer traffic free zone for dropping off and collecting children.
- The development must incorporate consideration of school capacity impacts and appropriate developer contributions.
- Lack of available spaces can result in longer travel distances or overcrowded classrooms.

Council Response

In respect of educational provision, the Council has undertaken an assessment of educational need generated by the site in respect of forecast future school places for nursery, primary and secondary education (BP43 Education). This indicates that, based on pupil forecasts, the site would generate the need for 115 secondary and 129 primary school

places. At primary level, there is insufficient capacity and a contribution towards additional places would be required. To meet growing demand for school places in St Athan, St Athan Primary School is allocated for redevelopment and expansion on the site of the existing school. A contribution towards Additional Learning Needs education would also be required due to insufficient capacity. At secondary level, there is sufficient capacity at Welsh Medium and Denominational schools, but additional capacity may be required at the English Medium catchment school, Llantwit Major School, when all developments are considered simultaneously. If this forecast position remains the same at planning application stage, the Council will look to secure a financial contribution towards increased secondary school capacity.

Where planning obligations are required, a Section 106 agreement will be signed which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

The TA submitted in support of the phase 1 application does highlight the potential for a pedestrian connection from the site to St Athan Primary School, subject to negotiations with the school and Local Education Authority, including the possibility of parents parking in the food store car park. Additionally, the road layout shown on the plans provides an opportunity for a potential link to the adjoining primary school, adjacent to the northeast of the site. As shown in the RLDP section below, this connection is deemed necessary as a new site access to St Athan Primary through the site to replace the existing sub-standard access to the school from Rock Road is proposed as a requirement in the RLDP Church Farm allocation.

Issue – Healthcare and Emergency Services

- Lack of access to adequate healthcare within the village.
- Healthcare services are already oversubscribed.
- No clear consultation with local doctors.
- Additional demand increases waiting times and reduces access for existing residents.
- No A&E facilities and additional traffic causes concern.
- Additional pharmacies, doctors, dentist would be needed.
- Lack of fire, ambulance and police infrastructure.
- Introduce clear occupation thresholds tied to delivery of healthcare provision.

Council Response

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where

key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.
BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes St Athan, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented from 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

The indicative masterplan identifies an area of mixed-use development within the larger parcel of allocation HG1 KS5 Land to the west of St Athan, which is located within 1km of the site. This demonstrates how an on-site community facility, as required by the allocation policy, could be accommodated to serve the proposed development. Although the nature of the mixed-use element is unknown at this time and will likely be determined at planning application stage, it could offer the opportunity to deliver community facilities and, if a need is identified by the LHB, further healthcare services for the local area.

The emergency services have been consulted and have not objected to the development. Please refer to the Council's response on Highways and Safety concerns in respect of additional traffic concerns.

Where planning obligations are required, a Section 106 agreement will be signed which sets out the timescales and trigger points for the provision of facilities and/or any financial

payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

Issue – Other Infrastructure

- No current infrastructure to meet the needs of additional population.
- The assumption that the infrastructure and services will be in place is highly implausible.
- Will place significant strain and pressure on existing infrastructure without prior investment in infrastructure.
- No mention or evidence to show how current essential services will be improved and enhanced to accommodate a significant increase in population.
- Council money should be spent on improving St Athan rather than causing more pressure.
- Additional demand on parks, play areas, wastage and recycling facilities.
- Additional shops, leisure facilities and flexible community uses are needed.
- Currently, many residents rely on larger nearby towns for community facilities and recreational facilities.
- Rural broadband infrastructure is already limited.
- Electricity networks may require upgrades to support new loads.
- No entertainment provision.

Council Response

Please refer to the Council's response above regarding concerns related to healthcare, emergency, and education service provision in relation to this site.

In accordance with the requirements of RLDP Policy CI1, the site must include a number of well-designed areas of useable open space, including informal and equipped play spaces, with appropriate green infrastructure connections between them. A playing pitch will be required as part of the outdoor sports provision requirement on Phase 2 of the development. It is expected that the open space will be delivered proportionately across the two phases of development. Where the requirements cannot be met fully on site, an off-site contribution will be required.

The allocation includes the delivery of a food store as part of the first phase which will increase the services available in St Athan, reducing the need for residents to travel to other settlements for convenience shopping.

In respect of community facilities, a contribution towards the provision and enhancement of community facilities in the area will be required. Additionally, the allocation at Land west of St Athan (HG1 KS5) will include the provision of an on-site community building to serve the development and wider area. The exact nature of this will likely be determined at planning application stage.

In terms of other infrastructure, the Council shall seek appropriate contributions from site developers towards enhancing recreational and community facilities. The RLDP will ensure that where appropriate, individual development proposals contribute toward infrastructure provision through established delivery mechanisms such as planning obligations (s106), site specific infrastructure requirements and/or phasing and coordination with relevant service and utility providers. S106 contributions can be sought from developers towards the costs of providing community and social infrastructure, arising from the development.

The identified infrastructure, set out in Appendix B of the Infrastructure Plan, is the result of extensive collaboration with key internal and external stakeholders, including but not limited to transport stakeholders, public health and emergency services, and utility providers.

Issue – Delivery Thresholds

- Infrastructure needs to be in place prior to any development of land.
- No triggers set to ensure that new facilities are in place before occupation of dwellings.

Council Response

While it is appreciated that the public understandably wants infrastructure built before any houses go up, S106 planning obligations are legally tied to the development itself. S106 funding therefore does not exist until the developer starts building and selling homes. However, trigger points for funding will be agreed at planning application stage so that certain funding can be released alongside development where viable.

Issue – Loss of Agricultural Land

- Less suitable for new development as an area of farmland and countryside.
- The site consists of high-quality agricultural land.

Council Response

The Phase 1 site is shown on the predictive Agricultural Land Classification (ALC) map as being Subgrade 3b, which is defined as “moderate quality” agricultural land and therefore, not best and most versatile land.

The site area located within Phase 2 is shown on the predictive ALC as predominantly Subgrade 3b, with 1.5ha in the south-eastern parcel showing as Grade 2 and a small area of Subgrade 3a. However, as a small area of Grade 2 forming only part of two larger agricultural fields, and mixed in fields of Subgrade 3b, the inherent quality is not capable of exploitation. The indicative masterplan demonstrates that built development will be directed away from the areas identified as potential Grade 2 and Subgrade 3a agricultural land. These areas are instead proposed to accommodate a significant area of public open space. Should the development be required to expand to the south-eastern part of the site, a detailed survey may then be required.

The parcel of land included within Phase 1 lies within the existing settlement boundary defined in the Adopted LDP, and Phase 2 is proposed for inclusion within the settlement boundary as part of the RLDP. Consequently, the site is regarded as forming part of the settlement rather than the surrounding countryside.

Issue – Landscape Impact and Loss of Village Character

- Green spaces will be ruined.
- Hedgerow loss as a result of widening of Gileston Road.
- Hedgerow removal can be harmful.
- Will change the existing settlement and destroy the character of the village.
- Infrastructure needed to support development would change St Athan into a town.
- Proper space should be left between gardens and the retained hedgerows.
- Hedgerows should be protected during construction and a long-term plan for their maintenance.
- This "urban creep" creates a continuous sprawl that permanently destroys the rural setting of the historic Church Farm and the village's unique sense of place.
- The house types and materials used should reflect the local character and distinctiveness.
- Incremental urbanisation of the village.
- Development will impact on amenity and sense of place.
- Changing the nature of the village into a dormitory settlement.
- Any built development will negatively impact the rural element of St Athan and the Village.
- Size/scale of development is inappropriate and incompatible with the current amenity and character of the village.
- Issues associated with unacceptable impacts on residential amenity should be addressed during the design process especially where mixed use developments are proposed.
- Visual impact because site is on a slope.

Council Response

St Athan is identified as a primary settlement within the Strategic Growth Area and should therefore be a focus for new development. The settlement is adjacent to the largest employment allocation in the RLDP at Bro Tathan Enterprise Zone and is in close proximity to the Employment Regeneration Opportunity Area at the former Aberthaw Power Station. A level of housing commensurate with the area's role as a focus for employment growth is therefore appropriate in order to deliver the key component of the strategy to align locations for new housing, employment, services and facilities to reduce the need to travel. The provision of new large housing developments in St Athan will also facilitate the delivery of additional facilities including retail and community facilities.

Infrastructure is a key component in delivering sustainable development and placemaking objectives in accordance with Future Wales and PPW. The RLDP will ensure that where appropriate, individual development proposals contribute toward infrastructure provision through established delivery mechanisms such as planning obligations (s106), site specific

infrastructure requirements and/or phasing and coordination with relevant service and utility providers. Infrastructure provision is a necessary consideration for sustainable development and is provided to meet the needs arising from housing and employment growth. Therefore, the delivery of such infrastructure would not, in itself, change St Athan into a town.

Although the Council notes concerns in respect of the impact on green spaces, as part of the planning application process, appropriate design and mitigation measures can be further developed and adopted as part of the masterplanning process. This ensures that the location and layout of uses are sensitively assimilated into the site so that the impact on landscape and visual amenity is minimised.

In accordance with the requirements of Policy CI1, the site must include a number of well-designed areas of useable open space, including informal and equipped play spaces, with appropriate green infrastructure connections between them. A playing pitch will be required as part of the outdoor sports provision requirement on Phase 2 of the development. It is expected that the open space will be delivered proportionately across the two phases of development. Where the requirements cannot be met fully on site, an off-site contribution will be required.

It is recognised that maintaining the distinctive character and appearance of settlements is an important planning objective. However, it is not considered that the development, in principle, would result in unacceptable harm to the character of St Athan as this site is adjacent to an existing housing estate, in close proximity to the centre of St Athan and therefore would represent an appropriate extension to the settlement. Any future development would be required to respond sensitively to local character through appropriate scale, massing, and height and use of appropriate materials.

A Landscape and Visual Impact Assessment was prepared in 2022 in support of the wider allocation. This assessment considered that beyond both phases of the site, the distinctive rural settled character of the area would remain unchanged. Whilst change to the character of the site would occur as an inevitable consequence of development on a greenfield site, it would provide development which would be in keeping with the settlement and general character of the settled valley landscape.

Following from this, A Landscape and Visual Impact Assessment has been submitted in support of the Church Farm phase 1 planning application. Although the assessment recognises that built form and infrastructure would be introduced across much of the site, physical changes to the landscape would be confined to the site and a section of Gileston Road adjacent to the site. The character of the site is already influenced by the adjacent urban edge of St Athan, and the proposed residential development has been designed to reflect a similar pattern to that of the adjacent settlement.

The assessment recognises that the proposed retail element would alter the local settlement pattern by introducing a larger scale-built form onto the site. However, the scale of the proposed retail unit would be similar to that of the nearby primary school and would not be wholly incongruous.

The Council notes concerns in respect of hedgerow loss. The proposed development has been designed to largely retain important landscape features such as boundary hedgerows and allows for new mitigating tree and hedgerow planting to replace the comparatively short section of hedgerow that would be lost to facilitate the proposed new access onto the site. Furthermore, the RLDP requires that hedgerows and other green infrastructure assets on the site boundary and within the site should be retained and included as part of green infrastructure corridors through the site wherever possible. Where this cannot be achieved, for example at the entrance to the site, appropriate compensatory planting will be required.

In respect of visual effects, the assessment considers that views of the site, and therefore of the proposed development, are typically situated in very close, or close proximity to the site boundary. In views from distances beyond approximately 1km from the site, views of the proposed development would be increasingly indistinct. The proposed development will blend into the existing urban edge of St Athan and will not appear incongruous or overly prominent in the wider landscape.

In summary, the assessment considers that the proposed development will result in some adverse impacts on the site's landscape and visual character, particularly during the construction phase and immediately after completion. However, these impacts are expected to diminish over time as landscaping matures, and the development is designed to integrate with the existing urban edge of St Athan.

Whilst similar conclusions may be drawn in relation to the remaining land within the proposed allocation, a detailed Landscape and Visual Impact Assessment would likely be required as part of any future planning application for phase 2 of the site.

It is acknowledged that the development would fundamentally alter the character of the land, and in the context of the existing LDP that land is countryside. However, while brownfield land is prioritised where possible, there is insufficient brownfield land (or land in core inner settlement locations) to come close to meeting housing need. Consequently, there are elements of the proposed housing supply that unavoidably require greenfield land and it is unavoidable in those circumstances that the character of the land will change. It is the purpose of the RLDP process to enable submitted candidate sites to be assessed, in order that housing need and growth can be met on the most appropriate sites, where those impacts are managed and minimised as far as possible. The Vale of Glamorgan is located within a National Growth Area in Future Wales, and this RLDP must be consistent with Future Wales. For the reasons give above, it is considered that the visual and landscape impacts are manageable and are balanced appropriately with the need for growth and housing (esp. affordable housing).

In relation to potential disruption during the construction phase, it is recognised that some temporary disturbance is inevitable with any building works, this will normally be controlled at planning application stage through a planning condition requiring a Construction Environmental Management Plan (CEMP), which will set out detailed measures to manage construction impacts.

Issue – Community Impact and Safety

- Ignores local opposition.
- No consideration for people who already live here.
- Potential for increased anti-social behaviour and pressure on policing.
- Risk to the wellbeing of both new and existing residents.
- Engage meaningfully with St Athan Community Council before progressing the development further.

Council Response

The site was first identified as a proposed allocation through the RLDP Preferred Strategy, which was subject to public consultation between December 2023 and February 2024. Following the Preferred Strategy consultation, a placemaking-focussed consultation event was held in October 2024 to present the emerging development proposals and obtain feedback from the local community. These non-statutory engagement events were held specifically to ensure that local residents and stakeholders had the opportunity to consider and provide feedback on the emerging proposals. The proposed allocation, together with further detailed information on the development proposal, was subsequently published as part of the Deposit Plan consultation. Consequently, communities have been able to engage with and comment on the proposed allocation and associated policies at several stages of the plan-making process.

The Council have fully considered all representations made as part of the Deposit Plan consultation and where changes are identified as needed, these have been identified during this process. Although the Council acknowledges the objections to this site, a balanced assessment of all material planning considerations is required to ensure the Plan remains sound and delivers the housing and employment needs identified in the spatial strategy.

While the concerns raised are noted, the provision of additional policing resources falls outside the remit of the planning system. However, residential development proposals are normally subject to formal consultation with the South Wales Police Designing Out Crime Officer who provides advice in respect of incorporating measures to ensure developments are safe and reduce opportunities for anti-social behaviour, whilst encouraging community cohesion.

The Council recognises that new development has the potential to impact upon a wide range of matters which can affect the health and wellbeing of the population. To ensure that new developments consider the health impacts of development, Policy SP5 sets out the requirements for site promoters to undertake an assessment of the proposed development prior to the submission of a planning application or at the pre-application stage.

All planning applications of 100 dwellings or more will require a Rapid Health Impact Assessment (HIA). A Rapid HIA typically involves a brief investigation of health impacts, including a short literature review of quantitative and qualitative evidence and the gathering of knowledge and further evidence from local stakeholders including relevant Council departments, Cardiff and Vale Local Health Board and Public Health Wales Health Impact Assessment Unit. This should identify the likely potential positive and negative impacts of a development proposal on the health and well-being of different population groups, on the wider determinants of health, and on health inequalities. The

recommendations identified through this process on how positive health impacts could be enhanced and negative impacts avoided or mitigated should inform the design of a development. Proposals that successfully incorporate measures that contribute towards creating healthy and accessible environments will be supported.

The Council have engaged and offered St Athan Community Council the opportunity to discuss and comment on the emerging Plan throughout the RLDP process. St Athan Community Council was formally consulted on the Phase 1 planning application and provided a response. The Council will continue to engage with the Community Council through consultation on any future planning applications associated with the allocation.

Issue – Flooding and Drainage

- Cumulative impact of hard-standing surfaces raises concerns regarding surface water runoff into the River Thaw catchment area.
- Replacing green fields will create a funnel effect.
- Welsh Water have previously noted concerns regarding the St Athan Wastewater Treatment Works.
- Proof is required that the current system can handle the RLDP's projected flow without increasing overflow events.
- Further development risks "Combined Sewer Overflows" (CSOs) into local watercourses, which contradicts the Council's Nature Emergency declaration.
- Can you provide documents on where DCWW have confirmed upgrades as part of the AMP8?
- Is the West Aberthaw still not programmed and committed?
- Are the plans sufficient to take the larger number of homes now planned?
- Will land purchase and planning consent be needed for the upgrades?
- Will the developers proposing local sites have to pay via S106?
- Drainage systems are already under pressure.
- West Aberthaw WwTW has a significant recent history of spills – 2023 data show 88 spills during the year and a total of 1,372.7 hours of untreated sewage discharged into the Bristol Channel.
- If wastewater systems are already non-compliant or over capacity, allocating further housing becomes undeliverable and environmentally unsafe.
- The ISA objectives to protect water quality and health are undermined.
- Delays in delivering sites under the previous LDP highlight the consequences of infrastructure constraints.
- The Council must commission an independent wastewater compliance review, integrate findings into the RLDP evidence base, add a policy requiring demonstrated wastewater capacity before permitting development and assess environmental risks tied to unlawful sewage discharges.
- Ofwats investigation into wastewater companies underscores the seriousness of compliance failures and the need for clear accountability.
- Existing drainage networks may not cope with increased surface water run-off.
- Greenfield development increases run off.
- Request full FCA and SuDS.

- Gileston Road and B4265 are known flood risk areas.
- Increased surface water flooding from loss of farmland.
- Attenuation ponds require maintenance to ensure ongoing efficiency.
- Flood risk in the village.
- Local sewer systems are overloaded, illegally discharging into the sea and polluting the area.
- Water supply or pressure issues may arise where systems are already stretched.
- No additional capacity for flood water/sewerage provision has been made in this proposal.

Council Response

The Council acknowledges that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). To address sewage capacity issues, DCWW have confirmed that a scheme to accommodate growth is planned for delivery at West Aberthaw Wastewater Treatment Works (WwTW) in the current AMP8 investment period (2025-2030). Currently the scheme is planned for completion in the 2025 to 2030 period. There is sufficient capacity for Phase 1 should development proceed in advance of the improvements.
Dwr Cymru Welsh Water have advised that Hydraulic Modelling Assessments (HMA) will be required to establish the impact of the proposal on both the existing water network and public sewerage network and potential developers would be expected to fund investigations during pre-planning stages.

It should be noted that all new and significant developments will have to implement some kind of sustainable drainage system (SuDS) as part of its design and build. These SuDS must be designed and built in accordance with standards published by Welsh Government and approved by the local authority acting in its role as a SuDS approval body (SAB). The SAB will then have the duty to adopt any compliant systems, serving multiple properties. Detailed consideration of any impact on surface water flooding is normally undertaken at planning application stage, when the site layout, finished ground levels and drainage design are known.

In respect of flood risk, a negligible amount of the site is identified as at risk from surface water flooding. It is considered that this can be addressed through a suitable SuDS scheme to be agreed with the SAB. Furthermore, in their screening of sites, JBA consulting concluded that there are no significant flood risk considerations in respect of the allocation. Nevertheless, a Flood Consequence Assessment will likely be required at the formal planning application stage.

Although concerns are noted, it is not considered that the ISA objectives to protect water quality and health are undermined. RLDP Policy DNP5 *Environmental Protection* establishes a policy framework that resists development proposals where they would result in unacceptable impacts on people, residential amenity, property or the natural environment. The policy sets out a series of criteria against which development proposals will be assessed, including pollution of land, surface water, groundwater and air quality, as well as any other identified risks to public health and safety. Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the

impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes.

Issue – Tests of Soundness

- Allocation is unsound.
- Fails tests of soundness.

Council Response

The Council considers that the Plan, its policies and allocations are sound, and this is demonstrated in BP4A *Assessment of Deposit Plan against the Tests of Soundness and Future Wales*. This position is further supported by the Welsh Government's response to the Deposit RLDP, which concluded that the Plan is in general conformity with Future Wales and specific policies within it.
Furthermore, the Plan and its supporting documentation, including the Consultation Report, will be considered by Full Council for approval to submit it to the Welsh Government, who will arrange for an independent Planning Inspector to be appointed to examine the Plan. The Planning Inspector will consider whether the Plan is fit for purpose by assessing it against three tests of soundness:

- Test 1: Does the plan fit?
- Test 2: Is the plan appropriate?
- Test 3: Will the plan deliver?

The Inspector will consider the written representations that have been made during the Deposit Plan, organise Hearing sessions and then produce a report which considers the issues raised. Ultimately, the Inspector will determine whether the Plan is sound or sound subject to changes, which may consist of redrafted text, the omission or inclusion of a policy, or changes to the proposals map.
Following receipt of the Inspector's report, the Council will be in a position to adopt the RLDP, which will replace the existing adopted Local Development Plan 2011-2026, and it will become the framework against which decisions on planning applications within the Vale of Glamorgan are made.

Issue – Noise and Pollution

- What mitigation steps will be put in place to prevent construction noise and wind-borne pollutants from affecting existing residents?
- Severe noise and light pollution which will affect the rural character and amenity of the Western Vale.

Council Response

Environmental constraints, such as potential noise and air pollution, are monitored through the Integrated Sustainability Appraisal (ISA) process. Site-specific noise and air quality assessments will likely be required at the full planning application stage to ensure that there is no unacceptable impact on noise pollution or air quality within St Athan.

Furthermore, RLDP Policy DNP5 *Environmental Protection* establishes a policy framework that resists development proposals where they would result in unacceptable impacts on people, residential amenity, property or the natural environment. The policy sets out a series of criteria against which development proposals will be assessed, including noise, vibration, odour nuisance and light pollution. Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes.

In relation to potential disruption during the construction phase, it is recognised that some temporary disturbance is inevitable with any building works, this will normally be controlled at planning application stage through a planning condition requiring a Construction Environmental Management Plan (CEMP), which will set out detailed measures to manage construction impacts.

Issue – Historic Environment

- Utilise Traditional Architecture Design Codes for all new construction.

Council Response

The Council does not intend to mandate design codes for the site, but at planning application stage, as set out in Policy SP4, major developments will need to prepare Placemaking Statements which consider placemaking principles.

The Council can confirm that the site is not covered by any ecological or heritage destination. There is a scheduled Monument at West Orchard Manor House to the north west of the Site and a nearby Listed Building (West House Farm) off Llantwit Road. A heritage impact assessment will be required as part of any future planning application. The Historic Environment Record identifies evidence of significant Medieval activity in the immediate vicinity of the site. A desk-based assessment and geophysical survey will be required.

Proposed change

Remove repeat reference to 'Historic Environment Record identifies evidence of significant Medieval activity in the immediate vicinity, a desk-based assessment and geophysical survey will be required' under key site issues and constraints headings in Appendix B of the Infrastructure Plan.

Issue – Ecology and Biodiversity

- Wildlife disturbance.
- Proposal must demonstrate clear alignment with green infrastructure and biodiversity enhancements.
- Protected species preset.
- Red listed species such as sparrows, yellow hammer, starlings all use the hedge alongside Gilestone road.

- Implement measures to protect wildlife and local habitats.
- The total loss of soil permeability and ancient hedgerow connectivity on a site of this scale cannot be mitigated by tokenistic landscaping.
- To maintain safety, foraging and wildlife corridors it is essential for existing hedgerows to be retained and enough space between hedge and new builds to limit disturbance.
- Rooks feed off the land, as do gulls and egrets.
- Bottom of the field is the one of the only places the Yellowhammer can be seen.
- There are bats in the barns at the north of the field which will be affected by the lights of a supermarket in the north west corner.
- Request biodiversity strategy.

Council Response

A Preliminary Ecological Appraisal was prepared in 2022 in support of the wider allocation. an Extended Phase 1 Habitat survey undertaken in October 2022 identified a limited range of habitats present at the site, all of which are typically associated agricultural farmland. The site consists of two adjacent field parcels covered entirely in heavily grazed improved grassland that was considered to be of limited ecological importance. Habitats considered of greater ecological importance in context of the site include the boundary hedgerows which have the potential to support foraging/commuting bats, nesting birds and other small mammals. The assessment considered that as part of the local green infrastructure network, these boundary features should be retained as far as possible and kept as part of any development so as to maintain habitat connectivity and provide wildlife corridors to allow for continued movement of wildlife through the site.

As set out in the Council's response to Landscape and Visual Impact concerns, the proposed development has been designed to largely retain important landscape features such as boundary hedgerows and allows for new mitigating tree and hedgerow planting to replace the comparatively short section of hedgerow that would be lost to facilitate the proposed new access onto the site.

This assessment also recommended that, dependent on the potential impacts of the development design, consultation with the local authority ecologist or further survey work would be recommended to inform a planning submission at the site and to inform any specific mitigation or enhancement measures with regards to bats and Hazel Dormice.

Following from this, an Ecological Appraisal has been submitted in support of the Church Farm phase 1 planning application. The southern site boundary is defined by an intact species-rich hedgerow, and the western boundary is defined by an intact species-poor hedgerow. The Hedgerows are judged to be of Local level importance and also comprising priority habitats for Wales. Habitats supported by the site are of value for a bat assemblage of Local level importance and also provide suitable habitat for breeding birds, common reptile and amphibians, as well as for notable mammal species such as European hedgehog (Erinaceus europaeus).

Accordingly, the Ecological Appraisal has provided specific proposals for the avoidance, mitigation and compensation of any predicted impacts including, where possible, the

protection of those valued features within and adjacent to the site and the creation of new habitats to compensate for proposed losses, whilst delivering new foraging, breeding and refuge opportunities for protected/notable species.

Overall, the appraisal considers that, given the scale of the development proposals and scope of those proposed mitigation measures in respect of habitats and protected/notable species, the scheme is capable of compliance with relevant wildlife legislation and planning policy for the conservation of the natural environment at all levels, whilst also delivering benefits to biodiversity and ecosystem resilience.

The Council's Ecologist was formally consulted on the Phase 1 planning application and has not raised an objection to the proposal. The Ecologist welcomes many aspects of the proposed development and associated ecological measures, whilst also providing a number of recommendations to further inform and enhance the scheme. In particular, to protect the high value retained and created habitats, such as the retained hedgerow, the newly planted hedgerow and the retained trees (collectively the light sensitive areas), a lighting plan will be required prior to commencement of development.

An Ecological Appraisal will likely be required as part of any future planning application for phase 2 of the allocation.

Issue – Layout and Density

- Utilise traditional architecture design codes for all new construction.
- Poor integration with existing design and settlement pattern.
- The master planning approach should clearly demonstrate how proposed density levels respond to local context.
- Reduce the housing density until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.
- The master planning approach should clearly demonstrate high-quality placemaking principles that prioritise green infrastructure, open space and liveability.
- The master planning approach should clearly demonstrate integration with existing neighbourhoods.
- Insufficient green space proposed.
- Site could deliver benefits if a green wedge is created between Gileston Road and the site.
- Houses should be front facing.

Council Response

St Athan is identified as a Primary Settlement in the settlement hierarchy of both the RLDP and current Adopted LDP. As the application for phase 1 of the Church Farm development is currently being considered under the Adopted LDP, the development proposal must meet a minimum density of 30 dwellings per net hectare as required by Policy MD6. The evidence submitted as part of the application demonstrates that the development will provide 232 dwellings across 7.7 hectares, which equates to 30.1 dwellings per hectare. The scheme is therefore considered to be compliant with Policy MD6 of the Adopted LDP.

In terms of any future development of the wider allocation, RLDP Policy PGD2 further requires a minimum density of 35 dwellings per net hectare for new residential development within the Key, Service Centre and Primary Settlements, in response to their local context. Development below the specified residential density levels will not be permitted unless it is demonstrated that there are significant site constraints that prevent development at the specified levels or where development at the density required would have an adverse impact on the character or appearance of the locality or result in the loss of an important site feature.

Where planning obligations are required, a Section 106 agreement will be signed which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage. The exact layout and density are matters that are also determined at the planning application stage and are not generally influenced by infrastructure delivery.

It is recognised that maintaining the distinctive character and appearance of settlements is an important planning objective. However, it is not considered that the development, in principle, would result in unacceptable harm to the character of St Athan as this site is adjacent to an existing housing estate, in close proximity to the centre of St Athan and therefore would represent an appropriate extension to the settlement. Any future development would be required to respond sensitively to local character through appropriate scale, massing, and height and use of appropriate materials.

The Council has assumed that the reference to a “green wedge” is intended to suggest the provision of a green infrastructure corridor or landscaped buffer between the site and Gileston Road. The layout proposed as part of the Church Farm phase 1 application and the Landscape and Visual Impact assessment demonstrate provision of a setback to the proposed built form development and road infrastructure from the site’s western and southern boundaries to provide space for SUDS features, retain existing hedgerow, create species rich grassland and, new tree planting.

In accordance with the requirements of RLDP Policy CI1, the site must include a number of well-designed areas of useable open space, including informal and equipped play spaces, with appropriate green infrastructure connections between them. A playing pitch will be required as part of the outdoor sports provision requirement on Phase 2 of the development. It is expected that the open space will be delivered proportionately across the two phases of development. Where the requirements cannot be met fully on site, an off-site contribution will be required.

Each phase will need to be acceptable in planning terms when considered separately, including a reasonable level of open space, affordable housing and other section 106 requirements across both sites. It is also important that the design of Phase 1 does not impact on the comprehensive development of any future phases, as identified in the emerging RLDP.

The Council does not intend to mandate design codes for the site, but at planning application stage, as set out in Policy SP4, major developments will need to prepare Placemaking Statements which consider placemaking principles.

Issue – Proposed Retail Unit

- Concerns with the placement of the retail unit on the site.
- A supermarket in the proposed site is unacceptable and will negatively impact local residents.
- Already a supermarket (Co-op) and local shop (Londis).
- Access issues for lorries.
- Concerns regarding necessary car parking for the retail unit.
- Access to the retail unit along Gileston Road seems inappropriate given the width of the road and current resident parking.
- Proposed access would be a danger to children who access the primary school and those living on Gileston Road.
- Homes between Eglwis Brewis, Picketson, West Camp and Church Meadow would benefit more.
- Will not resolve infrastructure shortcoming.
- Will harm local businesses and drive trade away from the village centre.
- Consideration should be given to smaller shops and businesses.
- Better placed on the B4265 for congestion levels and safety as well as passing trade from Llantwit and Rhoose.
- The building and frontage should be carefully designed with appropriate materials and landscaping so that it sits comfortably on the B4265 road.
- Disproportionate and harmful to amenity and safety.
- Request revised retail proposals.
- Local community not informed that a supermarket was planning for the village.
- Located too close to the primary school.
- Will reduce jobs.
- Understood to be requested in North-west of St Athan not North-west of the site.
- Risks change of use to additional housing.

Council Response

In response to the Preferred Strategy consultation that took place between December 2023 and February 2024, the Council received comments that raised concerns with the lack of shops in St Athan and the subsequent need to travel outside the area to access food shopping. Specific comments were made regarding the need to set aside land in the development for additional retail units. In response to these comments, the Initial Consultation Report stated that the Council would consider how services and facilities could be provided alongside housing proposals in St Athan to improve accessibility and would hold community engagement sessions on key housing sites to help identify local priorities and aspirations.

Following the Preferred Strategy consultation, a placemaking-focussed consultation event was held in October 2024 to present the emerging development proposals and obtain feedback from the local community. A class A1 retail foodstore was included in these proposals to enhance local services in response to the feedback provided to the Council during the consultation on the Preferred Strategy. The public had the opportunity to have their say on these proposals during the placemaking and Deposit Plan consultations as well as during the pre-application consultation (PAC) process. The responses received as part of the PAC process are addressed in the applicant's PAC report submitted by Turley in support of the full planning application.

It is acknowledged that the need for additional floorspace as per the adopted LDP requirement to 2026 has been met. However, as part of the evidence base for the RLDP, an updated Retail and Leisure Survey was undertaken by Nexus in June 2023, which looked to provide the Council with an up-to-date objective assessment of retail and leisure development needs in the Vale. This study concludes that in the period to 2036, in quantitative terms, there is a need of between 4,282 sqm and 5,862 sq m of convenience floorspace.

In accordance with PPW, Developers should demonstrate that all potential retail and commercial centre options, and then edge-of-centre options, have been thoroughly assessed using the sequential approach before out-of-centre sites are considered. The sequential test is also required by TAN 4, which sets out further details. As the application is for a Class A1 foodstore of up to 20,000 sq ft (1,858sqm), it does not meet the threshold for a retail impact assessment required by TAN 4. However, during pre-application discussions, it was agreed that a Retail Impact Assessment (RIA) would be required and could be based on existing information available in the public domain, including data from the assessments submitted in support of the Lidl application in Llanmaes.

A full RIA has been submitted as part of the application which directly addresses the policy context, including the 'tests' of retail impact and need identified in PPW and TAN 4. It considers that as the proposal is of broadly similar size and nature to the Lidl application in Llanmaes and are only located a relatively short distance apart, it is reasonable to anticipate that they will serve the same Primary Catchment Area (PCA). The RIA is therefore largely based upon the Lidl household survey, the economic tables contained within the Lidl PRS prepared by Carney Sweeney and assumptions regarding trade draws informed by the retail audit of the PRS undertaken by the Council's retail consultant at Nexus. The Council consider that this approach is justified and appropriate to the proposal's location and scale, and responds to the points raised during pre-application discussions.

In terms of impact on local businesses and trade, in its consideration of the Lidl application in Llanmaes, Nexus concluded that in spite of the foodstore having an estimated impact of -11.9% on Llantwit Major District Centre (which was identified within its own trade diversion analysis), and whilst it was regrettable that the Lidl proposal may result in a loss of some trade from the in-centre Co-op and Filco stores, it was considered that this could not be considered an 'unacceptable impact'. In Nexus' view, the stores in Llantwit Major would continue to attract a small amount of main food shopping but their primary purposes were as top up shopping destinations, related to a pass-by and walk-in trade which would enable them to remain viable. Therefore, it is reasonable to apply a similar analysis to St Athan,

considering that currently only 0.1% of overall spend on convenience shopping in the study area (the majority of the Vale of Glamorgan) takes place in St Athan, indicating a significant 'leakage' with the majority of residents currently travel outside of St Athan for food shopping.

The assessment demonstrates that existing stores within the catchment area retain only a small proportion of residents' main food shopping expenditure, with most spending taking place at stores outside the area. Therefore, the provision of a main foodstore on the application site would reduce the length of unnecessary journeys made, especially by car, which would have significant sustainability benefits.

Although nearby top-up shopping facilities in St Athan are likely to experience levels of trade diversion as the largest convenience stores closest to the site, these are also located in edge/out-of-centre locations and the turnover analysis does not take into account the increase in top-up shopping trade which may be experienced as a result of the increase in residential expenditure and expansion across St Athan as a whole. It is further noted that the proposed store's comparison goods turnover represents only a small proportion of forecast spending growth within the catchment area and is therefore not expected to have a significant impact on existing retailers or centres.

Additionally, the site's proximity to St Athan Local Centre could potentially result in an increase in pedestrian linked trips, especially from the wider residential development and generate positive spin-off for other businesses in the centre. Wider economic and social benefits are also likely to materialise if a foodstore is developed on the application site, including the creation of jobs for residents of St Athan and the wider Vale of Glamorgan area.

As agreed with the Local Highway Authority, it is anticipated that all traffic generated by the proposed development, including the residential dwellings and proposed foodstore, will access the site via Gileston Road. As shown on the indicative masterplan, it is envisaged that vehicular access will be provided from the B4265 during the Phase 2 development.

Formal consultation has taken place with Highways on the Phase 1 application, and discussions are ongoing regarding highway and road safety concerns.

The Council acknowledges that the other side of the Village does not currently benefit from a local shop. However, the allocated sites in this area are located close to existing community facilities, including a community centre and community café. Furthermore, the proximity of the proposed foodstore to St Athan Local Centre provides an accessible and sustainable shopping destination for local residents and may potentially result in increased pedestrian linked trips, especially from the wider residential development and generate spin-off for other business in the centre. The policy framework in RLDP Policy SP12 recognises that the provision of such floorspace has the ability to reduce the need for existing and new residents to travel to other settlements to serve their needs.

Although the Council notes suggestions regarding alternative uses of the site, the proposed retail provision has been informed by the identified retail need set out within the Nexus Study, together with representations received during the Preferred Strategy consultation as

well as the RLDP's support for the integration of retail floorspace within mixed-use developments, in line with placemaking principles. The remaining convenience floorspace identified under Policy SP12, together with comparison retail provision, should be delivered through opportunities within existing town and district centres, including regeneration schemes, in accordance with the Town Centre First policy.

Should planning permission be granted, development of the site would be required to proceed in accordance with the approved plans. The retail provision is also proposed for allocation under RLDP Policy SP12 and constitutes a key component of the HG1 KS4 allocation. Consequently, any future proposal seeking an alternative use of the site would be subject to assessment against the development plan and may be contrary to future planning policy.

In regard to the location of the proposed retail unit, it is noted that in the illustrative masterplan for the placemaking event that took place in October 2024, the food store was shown in the north west corner of the site. Although the Council acknowledges concerns with the location of the retail unit, the layout presented in the pre-application enquiry showed the store located directly behind the listed war memorial which presented concerns regarding the setting of the memorial. This has subsequently been amended following pre-application discussions.

It is anticipated that all traffic generated by the proposed development, including the residential dwellings and proposed foodstore, will access the site via Gileston Road. This has been agreed with the Local Highway Authority. As shown on the indicative masterplan, it is envisaged that vehicular access will be provided from the B4265 during the Phase 2 development.

The adopted LDP sets out a retail hierarchy, with St Athan: The Square being identified as a 'Local Centre.' A map of the retail centre boundary is set out in Appendix 6 of the LDP. The boundary of the site is less than 100m from the local centre boundary. TAN 4 states that when edge of centre locations are being considered, development proposals should be located next to a designated retail and commercial centre boundary, and where this is not the case it should not normally be more than 200 to 300 metres from the edge of the centre. The location of the food store to the north west of the site better accords with this guidance, given the much closer proximity (less than 100m) of the site to the retail boundary than the location shown in the pre-application enquiry.

Furthermore, the location of the store and its associated parking closer to the school could offer the potential for the retail store car park to be used as drop off parking for the school, which is something that has been successful elsewhere in the Vale. This would be subject to agreement from the relevant parties.

The relocation of the retail foodstore back to the north of the site has also allowed for this south western corner to be designed in a manner that enhances the setting of the war memorial. Whilst the Historic Environment assessment considers that the proposed development will alter the setting of the war memorial, it will only represent a negligible negative impact on its significance. This conclusion reflects the design approach, which aims

to retain views of the memorial from the southwest, including the distance from the retail element and the green corridor located immediately behind the war memorial.

In order to ensure that the development does not exacerbate existing parking issues, there will be a requirement for sufficient parking to be provided on site as part of the development, in accordance with the maximum standards set out in the Council's Parking Standards Supplementary Planning Guidance. This will be determined as part of the planning application.

In respect of design, the phase 1 application is submitted as a hybrid planning application, comprising full planning permission for the residential development and outline planning permission for a retail foodstore, with further details to be confirmed through future Reserved Matters submissions.

Change required

To ensure consistency across the policy, the floorspace capacity of Land at Church Farm, St Athan, should be amended from up to 1,858 sq m gross floor area to up to 1,400 sq m net floor area. This will also result in consequential changes to paragraph 6.209, Policy HG1 KS4 and paragraph 6.99.

Issue – Other Matters

- Request re-assessment of the site.
- Older person housing should be considered as part of affordable housing.
- An increase in hard surfaces also increases ambient temperatures compared to grassland, woodland and other green spaces necessitating increased power use for cooling and comfortable living temperatures. Building practices can help mitigate this but only where this is incorporated into sustainable building rules.

Council Response

The site has been assessed through all stages of the Candidate Site Assessment process and has been subject to detailed consideration as part of the RLDP evidence base. Furthermore, Phase 1 of the allocation is carried forward from the Adopted LDP, establishing the principle of development in this location. In light of this, it is not considered necessary to undertake a further site assessment. The allocation is also supported by a comprehensive evidence base, which has informed its inclusion within the Plan.

The delivery of affordable housing is a key objective of the RLDP Strategy. The residential requirement identified in Policy SP6 is expected to contribute to the established community housing needs of the Vale of Glamorgan by delivering a minimum of 3,070 affordable residential units over the plan period. In meeting this target, a mix of affordable housing will be required, informed by the Local Housing Market Assessment LHMA, waiting list data and the Older Persons Housing Strategy. This should include a range of tenures, types and sizes of homes, as well as an appropriate balance of general needs and specialist accommodation.

Furthermore, in accordance with RLDP Policy HG6, the Council will support the development of specialist accommodation to meet the diverse needs of the Vale of Glamorgan's

population. Specialist accommodation includes, but is not limited to, extra care housing, supported living schemes, wheelchair-accessible homes, and housing with integrated care services. These forms of housing enable individuals to live independently for longer, reduce pressure on health and social care services, and contribute to the creation of inclusive and resilient communities.

The Council is satisfied that the Plan gives appropriate consideration to the need for older person housing as part of its overall affordable housing provision.

In response to the climate emergency declared in the Vale of Glamorgan, RLDP Policy CC1 proposes a policy framework that will require new dwellings to exceed the energy standards set out in current Building Regulations and will deliver homes that are net zero in operation. The approach to delivering this should accord with the Energy Hierarchy for Planning, which requires the improvement of fabric standards, energy efficiency and minimising space heating requirements, before installing renewable energy and then offsetting residual energy if required. This is the most sustainable approach and will make an important contribution to addressing fuel poverty and improving social equity. The policy will apply to all applications for new build dwellings.

Council Overall Response

Following a detailed review of the representations submitted in respect of Key Site 4 - Land at Church Farm, the Council acknowledges the range and breadth of concerns raised. The Council recognises that the delivery of appropriate infrastructure and mitigation measures will be essential to ensuring that the development is brought forward in a coordinated, sustainable and responsible manner, and these considerations have informed the allocation of the site.

Many of the matters raised relate to detailed design, technical and operational issues that are most appropriately assessed when a planning application is submitted and full development proposals are available. However, for the purposes of plan preparation, the Council is satisfied that there is sufficient evidence to demonstrate that the site represents an appropriate, sustainable and deliverable allocation within the RLDP. The allocation is considered to accord with the Plan's strategy and strategic objectives and is therefore regarded as sound.

HG1 KS5 LAND TO THE WEST OF ST ATHAN

Representation ID	Respondent Name	Representation Type
4463	Mr Bernard Drew [2796]	Object
4464	Mr Colin Simmonds [2797]	Object
4470	Mrs Helena Cook [2801]	Object
4496	Mr Simon Parker [2821]	Object
4509	Mrs H Evans [2823]	Comment
4511	Mr Gareth Evans [2824]	Comment
4592	Mr David Barton [2683]	Comment
4696	Mrs June Baggott [2889]	Object
4719	Mr Bernard Drew [2796]	Object
4880	Mr Tim Brown [3000]	Comment
4909	Dr Tim Render [3016]	Object
4910	Dr Tim Render [3016]	Object
5100	Mr Tim Brown [3000]	Comment
5144	Mrs Helena Cook [2801]	Object
5426	Mrs Susan Evans [712]	Object
5546	Mrs Deborah Schmit [3290]	Object
5654	Mr David Entwistle [3264]	Object
5775	Mr Simon Rawlins [2457]	Comment
5853	Mr Jeff Smith [3399]	Object
6133	Ms Ann Barnaby [1702]	Object
6134	Ms Ann Barnaby [1702]	Object
6186	Dorian Davies [1589]	Comment
6474	Mrs Melissa Plimmer [3599]	Object
6504	Mr Neil Jenkins [2729]	Object
6547	Dorian Davies [1589]	Comment
6591	Councillor Stephen Haines [1029]	Comment
6635	Mr Andrew Street [3444]	Object
6658	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6705	Ministry of Defence (Mr Chris Waldron, DIO Assistant Safeguarding Manager) [690]	Comment
6739	Hallam Land Management [854]	Support
6741	Hallam Land Management [854]	Comment
6801	Barry & Vale Friends of the Earth [708]	Comment
6976	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7030	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
7042	Marion morgan [2413]	Object
7142	Peter Stone Properties Ltd [1182]	Object
7163	Wig Fach Property Company Ltd [2373]	Object
7205	Mr Clifton Russell [3064]	Object
7229	Mr Tim Brown [3000]	Comment

A total of 39 representations were submitted in respect of the Key Site 5 – Land to the West of St Athan, by 30 individual respondents raising a number of issues associated with the development of the site. The issues are summarised below and full Council response to the issues is set out. It should be noted that some representors submitted more than one representation in respect of the site. Duplicate representations have only been counted once, but if representations made different points, these have been counted separately.

The statutory consultee responses from NRW, DCWW and Ministry of Defence have been addressed first. As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

The Council has provided an individual response to the representation submitted by Hallam Land Management, which proposes a number of specific amendments to the wording of the allocation.

The key issues raised were in relation to the sustainability of the location, the level of development within St Athan, infrastructure capacity, loss of agricultural land, flooding and drainage as well as sustainable transport and highways issues. Concerns were also raised about the impacts on the historic environment, biodiversity, noise and pollution, landscape and village character. Representations also considered that the proposed site was contrary to other policies in the RLDP and national planning policy. Other matters were also raised including delivery thresholds for infrastructure, soundness, master planning and community impact and safety.

It is noted that a number of background documents for each Key Site were made available as part of the consultation and where relevant the Council's response to a representation makes reference to this evidence.

STATUTORY CONSULTEE RESPONSES

6705 – Ministry of Defence – Comment

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Policy HG1 KS5 - MOD St Athan (technical safeguarding zone) Development triggering statutory safeguarding criteria:

- Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement
- Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement

Suggested Change

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Council Response

The comments from the Ministry of Defence on the need for statutory consultation if development exceeds 15.2m are noted. It is anticipated that the type of development proposed will be two storey dwellings and low-level apartment blocks. The threshold of 15.2m would relate to building of greater than 4 storeys, which is not the type of development proposed in the indicative masterplan. However, for consistency with other sites and to ensure the matter is given due consideration at detailed design stage, it is recommended that a statement be included in Appendix 2 to highlight this consultation requirement.

Proposed change

Include the following text as a key site issue/constraint at Appendix 2 – Infrastructure Delivery Plan "Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site that exceed 15.2m to ensure that there is no impact on the operation or capability of the defence site or asset."

6976 – Dwr Cymru Welsh Water – Comment

Water Supply - A hydraulic modelling assessment (HMA) will be required.

Waste Wastewater - A hydraulic modelling assessment (HMA) will be required.

Wastewater Treatment Works - Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030, and capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of a scheme at the WwTW.

Council Response

The comments from Dwr Cymru Welsh Water (DCWW) on the need for hydraulic modelling are noted. DCWW had previously made these comments and Appendix 2 Infrastructure Plan reflects this requirement.

6658 – Natural Resources Wales - Comment

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.

Council Response

The comments are acknowledged. The Council notes that similar comments have been made in respect of the nearby allocation of Bro Tathan. Both key site allocations are supported by Preliminary Ecological Appraisals which have informed Masterplans for the sites.

Through the application process, the Council will consider the wider impact on protected species and ensure that the matters raised are appropriately considered, in accordance with the step-wise approach and the green infrastructure strategy.

7030 – Natural Resources Wales (NRW)

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.

Council Response

The comments are acknowledged. The Council notes that similar comments have been made in respect of the nearby allocation of Bro Tathan. Both key site allocations are supported by Preliminary Ecological Appraisals which have informed Masterplans for the sites.

Through the application process, the Council will consider the wider impact on protected species and ensure that the matters raised are appropriately considered, in accordance with the step-wise approach and the green infrastructure strategy.

INDIVIDUAL RESPONSES

6739 – Hallam Land Management (Savills)– Support

Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Its allocation as a Key Site in the Deposit RLDP represents extensive and thorough assessment. Its proposed allocation is therefore considered to be sound and firmly evidence based.

Council Response

Support is noted.

6741 – Hallam Land Management (Savills) – Comment

So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.

1. Suggest that the word 'approximately' is added to the policy wording to reflect the potential degree of deviation (which would be upwards or downwards).
2. Suggest removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3. Suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach for this to be considered on a site-by-site basis.
4. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements: 'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.
5. Suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm.
6. RLDP should be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major.
7. Hallam has suggested additional wording to clarify the challenges associated with delivering a continuous pedestrian link along Llantwit Road.
8. Suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop: 'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals).'
9. Suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted.
10. Suggest that the wording of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. The reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'.
11. Note the error in the wording of the sixth bullet point under 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) whereas it should be Policy CI3(6).
12. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Council Response

In respect of point 1, the Council does not consider it necessary to include the word "approximately" before the stated number of homes to be delivered. However, the Council

accepts the suggested amendment to remove the reference to a specific number of affordable homes to be provided on the site and instead retain only the required percentage (point 2). This is consistent with the approach taken in the Adopted LDP.

The policy requirement for the affordable units to be dispersed across the development in clusters of no more than 10 units (point 3) is consistent with the Council's longstanding policy as set out in the Council's Affordable Housing Supplementary Planning Guidance. This is to ensure that social rented and low-cost home ownership units blend in with the neighbouring open market housing and is integrated properly across a development, which is especially important on larger housing developments. Therefore, the wording will remain unchanged.

The Council does not consider it necessary to add the statement, 'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage', under the Sustainable Transport and Highways heading (point 4). The site allocation and associated policy have been informed by the Strategic Transport Assessment and site-specific Transport Assessments available to date. Furthermore, this statement is already reflected in the fourth bullet point of the Sustainable Transport and Highways requirements and therefore the wording will remain unchanged.

The provision of an active travel route along the B4265 between the site entrance and the Gileston Road junction to the east is considered necessary to ensure sustainable connectivity between the site and the wider village. Therefore, the Council does not consider it appropriate to amend the wording to require only a contribution towards its provision (point 5), as this would not ensure the delivery of a necessary active travel link required to support the development.

The Council notes the request to include the statement *"Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)"* before bullet points 2 and 7 in the Sustainable Transport and Highways section.

In the response to Link Transport Planning Transport Assessment Review, Apex stated that:

"We have considered a footway / cycleway route connecting from the site access to the west and linking to Llantwit Major. This route can also be delivered by the scheme which would therefore enable a footway / cycleway connection all the way between St Athan and Llantwit Major. This would provide a link between the strategic identified ATNM routes in Llantwit Major (VALE-LM-Future-046A) and St Athan (VALE-SPR-Future-003I)."

Given that the site promoter's own evidence demonstrates the potential deliverability of the route and makes reference to relevant ATNM routes, the Council is satisfied that the requirement for a contribution towards the delivery of an Active Travel route between St Athan and Llantwit Major remains justified. Therefore, no changes to the wording are proposed (point 6).

The Council also does not consider it necessary to add the suggested statement to bullet point 7. The purpose of this criterion is to ensure that the road layout and width are designed to **allow** for the provision of a loop road to facilitate a bus connection. It does not require the delivery of a bus connection as part of the development itself.

The Council agrees to amend bullet point 8 so that it reads: 'The provision of (or contribution towards) pedestrian/cycle links to Llantwit Road and pedestrian footway improvements along Llantwit Road.' However, it is not considered necessary to remove the reference to 'footway' or to include the wording 'where possible.'

In all cases, the Council considers that the requirements set out within the allocation are justified by the evidence base and are therefore necessary in planning terms and therefore this does not need to be explicitly included within the policy wording.

The Council does not support the proposed separation of the bullet points or the introduction of an additional heading, 'Safeguarding of Land Within', under the Sustainable Transport and Highways section (point 9). The existing policy structure is considered clear and proportionate, and the suggested change would not materially improve the policy framework.

It is not considered necessary to amend the policy wording relating to education contributions, as suggested in point 9. The policy currently requires 'an off-site contribution towards the delivery of additional school places in accordance with capacity requirements within the catchment area.' This wording remains appropriate as it reflects the identified need set out in BP43 Education and provides sufficient flexibility to address school capacity requirements at the time of any future planning application.

The Council does not consider the proposed amendments to the Community Infrastructure section to be necessary and is satisfied that the existing wording should remain unchanged.

Policy SP13 sets out the requirements for ensuring that all new developments in the Vale of Glamorgan are supported by appropriate services and facilities to meet their needs and the needs of the existing community, to create safe, sustainable, liveable, healthy and mixed communities. This may be through enhancements to existing facilities or the provision of new infrastructure.

With regards to point 10, developments can place additional demands on services and facilities which could affect their ability to meet the needs of the community. The provision of new infrastructure, as well as safeguarding, improvement, long-term maintenance and efficient use of existing infrastructure is central to ensuring that all new development proposed within the Plan period contributes to achieving the Plan's vision of creating sustainable communities. Timely delivery of necessary infrastructure that supports and mitigates the impact of new development is therefore essential. In this instance, the Council considers that the requirement for a community building should not be assessed solely on the basis of quantitative need. The requirement is supported by evidence of qualitative need and, therefore, amending the wording to refer only to 'community space' would not adequately reflect the requirements of Policy SP13 or align with the wider objectives of the plan framework.

The Council notes the typographical error in the wording of the sixth bullet point under 'Sustainable Transport and Highways' heading. To ensure consistency with the policy framework, the reference to the safeguarding of land on the southern side of the railway line will be corrected from Policy CI3(2) to Policy CI3(6). This will address point 11.

In accordance with the requirements of RLDP Policy CI1, the site must include a number of well-designed areas of useable open space, including informal and equipped play spaces, with appropriate green infrastructure connections between them. The indicative masterplan demonstrates the extension of St Athan Recreation Ground including the provision of an additional sports pitch, areas of equipped play and community allotments as required in the allocation. Therefore, the Council considers the suggested wording at point 12 to be overly vague and insufficient to secure the delivery of the necessary infrastructure.

Proposed change

Under 'Sustainable Transport and Highways', reference to the safeguarding of land on the southern side of the railway line will be amended from Policy CI3 (2) to Policy CI3 (6).

To ensure consistency with the Adopted LDP, the Council will remove the reference to a specific number of affordable homes to be provided on the site and instead retain only the required percentage.

The Council will amend bullet point 8 so that it reads: 'The provision of (or contribution towards) pedestrian/cycle links to Llantwit Road and pedestrian footway improvements along Llantwit Road.'

COMPOSITE RESPONSE

SUPPORT

- Reassuring that there will be no vehicular access to/from Llantwit Road.
- Delighted to see land safeguarded for a potential new train station/halt with parking in a perfect location.
- Support the measures suggested to minimise additional traffic onto Llantwit Road.

Council Response

Support is noted.

COMMENTS AND OBJECTIONS

Issue - Traffic, Parking and Highway Safety

- Additional 1500-2000 vehicles on already narrow and congested roads.
- Increased commuter traffic and congestion, especially at the monument.
- Concern with potential vehicle access from development onto Higher End & Llantwit Road. Only viable access will be from the B4265.
- Higher End should not be made into a through road and access to Bro Tathan and the helicopter based should be provided via a new access point.
- There should be no vehicular access to or from Llantwit Road or Gileston Road.
- Increasing numbers of speeding traffic on surrounding roads.
- Traffic calming measures needed.

- Roads between St Athan, Rhoose and Barry are already over capacity. These must be upgraded before more houses are built.
- Asking for a contribution is not enough.
- Major negative impact on already over capacity road junctions towards Barry and Cardiff.
- Added pressure on Port Road towards Weycock Cross.
- Proposals to mitigate existing traffic issues are inadequate as they are based on outdated traffic counts.
- Impact on traffic movements via B4265 is not fully considered and planned for.
- Potential traffic on Llantwit Road.
- No due consideration for road infrastructure.
- Increased reliance on private vehicles will result in major negative impacts on junctions already over capacity.
- Further transport assessment and modelling should be undertaken to ensure a concrete, realistic and deliverable plan for road infrastructure is put forward before sites are included in the RLDP.
- Public transport experiences the same traffic issues.
- Access is already dangerous into St Athan.
- Additional access onto B4265 would be on a hill with poor visibility and a blind bend.
- Does the proposal to block Llantwit Road on its western route mean that Briarbank will have no vehicle access into St Athan?
- Introduce clear occupation thresholds tied to delivery of highway mitigation.
- Impact of construction vehicles.
- Additional vehicles will create bottlenecks.

Council response

The Council acknowledge that the proposed RLDP housing allocation at Land West of St Athan, alongside additional sites in St Athan, Rhoose and Barry, have the potential to increase traffic flows within the Vale of Glamorgan. Accordingly in preparing the Deposit Plan, the Council has sought to identify the potential impacts and identify mitigation measures that will be required by the site promoters to contribute towards addressing these issues.

Strategic Transport Assessment

In considering the traffic implications associated with Key Site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of development proposals on the strategic transport network and mitigation measures. In addition, the STA is supplemented by evidence from site specific Transports Assessments. The full assessment is set out in background evidence documents BP14 Strategic Transport Assessment – Stage 1 and BP14A Strategic Transport Assessment – Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a comprehensive review of the baseline transport conditions in the Vale of Glamorgan and examines the

existing transport infrastructure and its current operational state, including the strategic highway network using various data sources.

The Stage 2 STA comprises a series of technical notes on the Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation and Cost Estimation and Funding Mechanisms.

The STA utilises the South East Wales Transport Model (SEWTM), which is owned by the Welsh Government and managed, maintained and updated by Transport for Wales. The model, which covers the whole Cardiff Capital region area, has been designed specifically to assist local authorities to identify the cumulative impacts of strategic housing allocations on specific junctions on the strategic highway network. It includes two forecast scenarios:

- 2036 Base Scenario – representing 2022 SEWTM base flows factored to 2036 using TEMPro derived growth rates, excluding traffic from the RLDP strategic housing sites.

- 2036 RLDP Scenario – representing the 2036 Base flows plus traffic associated with identified strategic housing sites.

As the study utilises a recognised base model, the Council is of the opinion that traffic data in the STA is comprehensive and fit for purpose.

Technical Note 5 of the STA provides a detailed assessment of the forecasted cumulative impact of the proposed RLDP housing allocations on 17 specific highway network junctions where the SEWTM outputs together with professional judgement and local knowledge indicated that the cumulative impact of RLDP sites would have a material effect on highway safety and operation. The Strategic Transport Assessment (STA) identifies the B4265/Gileston Road junction as one of the locations where mitigation is required to address the cumulative impact of the RLDP strategic housing allocations. It is therefore appropriate that Policy TR1 identifies the Gileston Road junction as a strategic highway improvement required to support delivery of the Plan.

The STA provides a plan-level assessment of the need for mitigation, based on forecast 2036 Base and 2036 RLDP traffic conditions. The assessment identifies that the junction is forecast to experience capacity constraints and that the cumulative impact of the RLDP strategic housing sites would require mitigation. Technical Note 7 identifies a potential mitigation concept for the junction, while Technical Note 8 provides an indicative cost estimate and apportionment methodology for securing proportionate contributions from relevant sites.

Technical Note 7 states that the strategic sites in St Athan have both presented options for the junction to be upgraded to signal control. This would be expected to include MOVA control and active travel enhancements. Whilst the existing war memorial represents a design constraint, there is scope for entry width widening and increased approach lane lengths within the adopted highway extents and with a strip of land from Church Farm west.

The TA has modelled the performance of the proposed signalised staggered crossroads layout under the 2036 RLDP scenario. The results confirm that the signalised layout provides sufficient capacity to accommodate forecast RLDP traffic demand while maintaining stable operation. Overall, the proposed signalised junction represents a substantial improvement in

operational control and safety compared with the existing priority layout. The design allows for better management of turning movements and provides the opportunity to introduce controlled pedestrian and cyclist crossings via potentially all-pedestrian stage sequences on all junction arms.

There are multiple proposed development sites in proximity to the Gileston Road junction which are expected to have an impact on its operation. The STA therefore identifies an indicative cost estimate and apportionment methodology so that relevant developments can make proportionate Section 106 contributions towards the junction improvement, based on their relative impact.

This approach is intended to support the delivery of development in a coordinated and proportionate manner. It ensures that all relevant developments that impact the junction contribute accordingly, rather than placing the full burden of mitigation on any single site. It also provides a mechanism through which early phases of development can come forward, where justified by site-specific Transport Assessment evidence, while securing contributions towards the strategic junction improvement.

The precise timing, phasing and trigger points for delivery of the Gileston Road junction improvement will be determined through the planning application process. Site-specific Transport Assessments will need to identify the level of development that can be accommodated before mitigation is required, the point at which the junction improvement or any interim measures are necessary, and the appropriate timing of Section 106 payments.

The first phase of the Church Farm development is subject to a live planning application under the adopted LDP. The developers have stated that this phase has been designed so that it would not prejudice any future improvement works that may be required at the Gileston Road/B4265 junction. This matter will need to be confirmed through the determination of the live planning application, including review of the submitted layout, transport evidence and any land required to deliver future junction mitigation. The Council will need to be satisfied that any development coming forward under the adopted LDP would not compromise the ability to deliver mitigation required to support the RLDP growth strategy.

The precise need, form, design, timing and phasing of any works to the Gileston Road/B4265 junction associated with later development will be considered through the relevant planning application process. This will be informed by site-specific Transport Assessments, detailed junction modelling, design development, Road Safety Audits, the scale and phasing of development proposed, and any cumulative development already permitted or implemented.

The inclusion of the Gileston Road junction within Policy TR1 should not be read as requiring the full junction improvement to be delivered before any development can proceed. Rather, the policy provides the basis for securing proportionate mitigation where this is justified by the evidence. The timing and trigger points for delivery will be determined through planning applications and associated legal agreements.

Where justified, relevant developments will be expected to make proportionate Section 106 contributions towards the strategic junction improvement. Any such obligations must meet the statutory tests, namely that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. Where planning obligations are required, a Section 106 agreement will be required which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

The policy wording therefore provides an appropriate plan-level basis for securing necessary strategic highway mitigation, while allowing the detailed need, form, phasing and delivery mechanism to be confirmed through planning applications and associated Section 106 agreements.

Site-specific Transport Assessment

A site-specific Transport Assessment (TA) has been produced in support of this allocation which was published for comment as part of the Deposit Plan consultation under Key Site supporting information. A review of the Transport Assessment was undertaken by Link Transport Planning on behalf of the Council, and a Transport Note was prepared in response by Apex Transport Planning.

The Council notes the concerns raised regarding the traffic growth and assessment scenarios used. However, Link Transport Planning advises that the TA uses a 2024 base year and applies TEMPRO-based growth to 2036 which is a suitable approach for assessing future traffic conditions. Furthermore, they note that future year assessments include traffic associated with the development proposed at Church Farm, which helps to address the cumulative impact and is welcomed.

The development will provide a signalised junction on to the B4265 with Active Travel crossing points providing access into both parcels within the site allocation It will also contribute towards off-site improvements to the capacity and flow of junctions on the strategic highway network as informed by the Strategic Transport Assessment and site-specific Transport Assessment. This includes improvements to the junction at the Weycock Cross roundabout. In addition, the development will be required to upgrade the existing cross roads junction of B4265/Gileston Road to the West. The Council's Highways Department has been engaged throughout the preparation of the RLDP and supports this approach.

While a cluster of four slight collisions at the B4265/Gileston Road crossroads are noted, the signal-controlled junction mitigation will improve queuing at the junction and will also offer a safety benefit by reducing conflict between vehicles turning into and out of Gileston Road. In addition, it will provide improvement for active travel, enabling safe crossing via a formal signal-controlled arrangement.

In respect of pedestrian safety, the assessment has considered Personal Injury Accident (PIA) data that has been reviewed from data published annually by the Department for Transport

(DfT). Only one serious PIA involving pedestrians was recorded within the most recent seven years of data which involved a car colliding with a pedestrian crossing at the signal-controlled crossing point along Rectory Road. There were no further collisions involving pedestrians within the study area and none involving school aged children. In addition, there were no PIAs involving pedestrians on Llantwit Road. On this basis, the assessment concluded that the route to the school and pedestrian routes within the wider area are considered safe and appropriate to accommodate walking movements.

In terms of safe access, there were no PIAs recorded on the B4265 and Llantwit Road adjacent to the site boundary. As such, the TA demonstrates that there is no evidence of any existing safety issues that would preclude potential access points being provided along the site boundary. The PIAs that have occurred do not indicate any specific pattern or safety issue with the geometry of the highway that would be exacerbated by a potential residential development on the overall site or new access into the site.

The TA confirms that a vehicular access from Llantwit Road for 'normal' traffic conditions is not considered appropriate due to the width of the carriageway along Llantwit Road and to ensure it remains appropriate for walking and cycling. When considering the planning application for the adopted LDP allocated site MG2 (2) 'Land at Higher End, St Athan', the Highway Authority response raised no concerns with the suitability of Llantwit Road for accommodating pedestrian movements. An access from the B4265 was therefore considered the only viable option to and from the site and Llantwit Road is considered suitable only for active travel movements.

Briarbank is situated outside the site boundary and, as such, its existing vehicular access into St Athan will remain unaffected by the proposed development.

Issue – Poor Active Travel and Public Transport

- No public transport or active travel routes that can accommodate the increase in population.
- No railway station or a regular half hourly bus service.
- Additional public transport facilities are needed and not covered in current proposals.
- Use of Llantwit Road as a bus route would be inconsistent with the potential Active Travel Route highlighted in the Apex Transport Assessment.
- Large increase in pedestrians accessing village via Llantwit Road.
- Lack of safe pedestrian pavements on narrow roads.
- No due consideration for public transport.
- Further transport assessment and modelling should be undertaken to ensure a concrete, realistic and deliverable plan for public transport is put forward before sites are included in the RLDP.
- Development assumes there is a proposed station.
- Station should be built and operational before development commences.
- Allocation relies heavily on delivery of station and therefore question compatibility with the strategy.

- More effort should be made to link key destinations with the Western Vale through active travel – separated paths not shared use paths.
- Introduce clear occupation thresholds tied to delivery of transport interchange infrastructure.

Council Response

Concerns with existing public transport services are noted. St Athan is served by bus service 304 linking the site to both Llantwit Major in one direction and St Athan centre, Barry and Cardiff in the other direction. It is recognised that this service only runs approximately once an hour and the concerns about timetabling with the hourly train service are noted. The Council will continue to liaise with transport providers on this matter and opportunities to maximise multi-model travel will be explored. It should be noted that the Council is currently considering tenders for 3 new rural Vale services which may also serve St Athan.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

The introduction of additional rail services at Llantwit Major and Rhoose will improve integration with the bus service.

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

A Preliminary Feasibility Study was undertaken in 2022 to assess the potential for a new railway station on the Vale of Glamorgan Line at St Athan. This study examined a range of potential locations and considered the opportunities and constraints associated with each site.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility

and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

Neither the employment nor housing allocations are considered to be reliant and dependent on the delivery of the station. St Athan is identified as a primary settlement within the Strategic Growth Area, reflecting the range of services and facilities available. Furthermore, the co-location of housing with the employment sites at Bro Tathan and Aberthaw means that the settlement is sustainable in its own right. This aligns with the key objective of the plan to locate new housing, employment, services and facilities in close proximity, thereby reducing the need to travel.

Notwithstanding this, delivery of the station would enhance opportunities for sustainable travel, and its delivery at the earliest opportunity would be supported and would clearly further improve travel options between settlements.

It should be noted that the Council is currently considering tenders for 3 new rural Vale services which may also serve St Athan. There are currently no known bus routes, nor any proposals for future bus routes, along Llantwit Road.

In line with the Welsh Government's Active Travel (Wales) Act 2013, the Vale of Glamorgan is committed to providing and promoting active travel routes across the region. The Council has produced maps which contain details of the proposed active travel routes that they seek to deliver over a 15-year period (approved by the Welsh Government in February 2018). Future routes include:

- Walking and cycling route running along the B4256, at the southern boundary of the Church Farm site.

- Walking and cycling route running along Gileston Road, at the western boundary of the Church Farm site which will provide a connection to an existing walking and cycling route along Eglwys Brewis Road (east of the site), providing convenient access to Llantwit Major.

- Walking routes running along Glyndwr Avenue and Llantwit Road to the north of the site.

- Walking routes along Flemingston Road and Clive Road to the north east of the site.

These proposed routes will contribute to ensuring St Athan is a walkable neighbourhood. A combined footway/cycleway has recently been implemented along the western edge of Gileston Road from the Parc Ffern Wen development (to the north of St Athan) to St John's Hill, close to the village centre. This route provides convenient access to the shared cycleway/footway along Northern Access Road/Eglwys Brewis Road and on the B4265 to Llantwit Major Boverton.

The Active Travel (Wales) Act 2013 is supported by Active Travel Act guidance and Part 1 provides design details for making improvements to walking and cycling infrastructure. Although the Council notes comments in respect of the need for separated paths, this guidance must be considered when designing and maintaining active travel routes and

related facilities, enhancing provision for walkers and cyclists as part of other highway schemes (including planned highway maintenance works), or when considering the needs of walkers and cyclists as part of new developments, traffic management and road safety schemes.

A detailed review of active travel links is included in Section 4 of the TA. This identified that improvements could be delivered along Llantwit Road and the B4265 as part of the scheme. Accordingly, the proposed allocation requires the provision of an Active Travel route along the B4265 between the site entrance and the Gileston Road junction to the east. Additionally, a contribution towards the delivery of an Active Travel route between St Athan and Llantwit Major will be required as well as the provision of pedestrian/cycle links to Llantwit Road and pedestrian footway improvements along Llantwit Road. Detailed active travel audits will be undertaken as part of any future planning submission.

Where planning obligations are required, a Section 106 agreement will be required which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

Issue – Sustainability of Location

- Not considered that the site aligns with the strategy of the RLDP.
- Significant number of dwellings to house employees of jobs that do not current exist.
- This site is not directly linked with St Athan.
- No guarantee that people moving into the development will work at Bro Tathan.
- Promotes car dependent growth in a rural location.
- Limited employment opportunities.
- Brownfield alternatives have not been sufficiently explored.
- Re-classify St Athan as a "Minor Rural Settlement" until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.

Council Response

St Athan is identified as a primary settlement within the Strategic Growth Area and should therefore be a focus for new development. The settlement is adjacent to the largest employment allocation in the RLDP at Bro Tathan Enterprise Zone, and is in close proximity to the Employment Regeneration Opportunity Area at the former Aberthaw Power Station. A level of housing commensurate with the area's role as a focus for employment growth is therefore appropriate in order to deliver the key component of the strategy to align locations for new housing, employment, services and facilities to reduce the need to travel. The provision of new large housing developments in St Athan will also facilitate the delivery of additional facilities including retail and community facilities. Therefore, it is not considered appropriate, or consistent with the overall strategy, to reclassify St Athan as a Minor Rural Settlement.

Whilst the site may represent a significant extension to the settlement, it is directly adjacent to existing residential development in St Athan and is located only a short distance from The Square, which is identified as a Local Centre within the Adopted LDP. Located approximately

half a mile from the proposed active travel access points on Llantwit Road, The Square provides a range of services and facilities including retail, a library, GP surgeries, pharmacy and post office. The site also adjoins St Athan Community Centre, the play area and recreation ground, and benefits from direct connections to the wider settlement via the B4265 and Llantwit Road. The development will also deliver an Active Travel route along the B4265 between the site access and the Gileston Road junction to the east and contribute towards the provision of an Active Travel route between St Athan and Llantwit Major. This would enhance connectivity within St Athan and improve access to surrounding settlements and services. The site is also located within half a mile of a bus stop, with service 304 linking the site to Llantwit Major, Barry and Cardiff.

Although the Council acknowledges that the proposed development will generate additional vehicle movements, as identified within the Strategic Transport Assessment (STA) and site-specific Transport Assessment (TA), the spatial strategy seeks to direct growth to locations that benefit from significant employment opportunities and existing or planned sustainable transport and active travel infrastructure. This approach is intended to reduce reliance on private car travel and support a greater proportion of journeys being undertaken by sustainable modes of transport.

The site is considered to be well served by current and future employment opportunities, as it is directly adjacent to Bro Tathan Enterprise Zone, which is identified as a major employment allocation under Policy SP14.1 of the Deposit Plan. The whole site is 338 Ha and it is anticipated that 66.7 Ha of employment land will be delivered on the site in the plan period, creating a significant number of new jobs. This includes several areas that either have planning permission or are subject to a planning application. In addition, a number of businesses are already operating on the site, providing existing employment opportunities.

In relation to concerns regarding greenfield development, a key component of the RLDP Strategy is "Allowing for regeneration opportunities on previously developed and underutilised land." The Adopted LDP has been successful in terms of bringing forward redevelopment of brownfield land, such as that at Barry Waterfront. The RLDP seeks to prioritise brownfield opportunities over greenfield sites wherever possible and many brownfield sites in the Barry area are allocated for housing (including at Neptune Road, Hayes Lane and Pencoedtre School). However, even with these allocations, there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth over the plan period and therefore greenfield land will also therefore need to be released.

Issue – Over-development of St Athan

- The village will experience ongoing construction for many years.
- Significant increase in population.
- Settlement boundaries appear to be more mobile than in previous years.
- Overwhelming for the surrounding environment.
- Each development in St Athan should not be discussed in isolation.
- Disproportionate to the existing village size.
- Over-provision for housing growth in St Athan.

- To add further sites for housing in this location over and above the original provision is considered to be unsound.

Council Response

St Athan is identified as a primary settlement within the Strategic Growth Area and should therefore be a focus for new development. The settlement is adjacent to the largest employment allocation in the RLDP at Bro Tathan Enterprise Zone, and is in close proximity to the Employment Regeneration Opportunity Area at the former Aberthaw Power Station. A level of housing commensurate with the area's role as a focus for employment growth is therefore appropriate in order to deliver the key component of the strategy to align locations for new housing, employment, services and facilities to reduce the need to travel. The provision of new large housing developments in St Athan will also facilitate the delivery of additional facilities including retail and community facilities.

New housing is required to meet forecast increases in the population and in household formation. In relation to housing needs, as of February 2026, the Council waiting list identified that there were some 7,700 persons/households registered on the Council's Housing waiting list across (over 3,200 in the highest priority need). There are over 200 persons/households on the housing waiting list in the ward of St Athan, together with high numbers for the adjoining wards of Llantwit Major and Cowbridge. Furthermore, the Council's latest LHMA indicates that there is a need for 128 new affordable dwellings in the ward, after existing committed sites have been discounted. There is therefore demonstrable need for additional affordable housing in the St Athan area as well as in the wider Western Vale.

It is established that the Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocations for affordable housing. Where sites have been identified as suitable, available and achievable through the candidate site process, they can be allocated for development. Settlement boundaries have subsequently been adjusted and redrawn where housing allocations have been proposed within the RLDP. All new allocations within the Deposit RLDP have been subject to the Council's site assessment and settlement boundaries subject to boundary review which is set out in BP46.

The sites in St Athan have not been assessed in isolation. The Plan is supported by a detailed evidence base, including transport and infrastructure assessments, which consider cumulative impacts at a strategic level. For example, the identified affordable housing need relates to the ward as a whole, rather than to individual sites. Similarly, the Strategic Transport Assessment (STA) has considered the cumulative impacts of all RLDP allocations on the local highway network and the mitigation measures required. The need for additional school places and enhanced services has also been assessed on a cumulative basis. Many of the representations received during the consultation are relevant to all the sites allocated throughout St Athan. As such, the Council's responses to these comments are broadly consistent across these sites.

Furthermore, the cumulative population growth generated by the four allocated sites in St Athan are expected to strengthen the business case for a transport interchange.

Issue – Conflict with Local/National Policies and Goals

- The proposal conflicts with RLDP Policy SP13 or Policy MD4 in the adopted LDP – ensuring provision, improvement and long-term maintenance of community infrastructure.
- The proposal conflicts with Policy SSC1 in the RLDP – development will fail to provide adequate resources and infrastructure to meet the needs of the additional population.
- The erosion of the "Strategic Gap" between St Athan and Eglwys Brewis violates the principles of Policy SSC1.
- The proposal conflicts with Policy PGD2 in the RLDP – lack of public transport to accommodate higher net densities.
- The proposal conflicts with Policies SP6 and SSC1 which state that facilities must be in place at the time of the application.
- Difficult to see how development works with Future Wales: The National Plan 2040.
- The proposal risks conflict with the RLDP's climate goals if there is increased reliance on private cars and if new residents commute elsewhere.

Council Response

As shown on the RLDP key diagram and explained in Policy SP1 Sustainable Growth Strategy, St Athan is identified as being located in the Strategic Growth Area and it is therefore a location where new housing would be concentred. The allocation of this site accords with the strategy. In terms of the RLDP's role in protecting greenfield land and safeguarding countryside, under Policy SP3, areas outside the settlement boundaries that are not allocated or protected for a specific use will be defined as countryside. The site is proposed for inclusion within the settlement boundary as part of the RLDP. Consequently, the site is regarded as forming part of the settlement rather than the surrounding countryside. The allocation of this site accords with the strategy and is not considered to violate the principles of RLDP Policy SSC1. Having regard to the available evidence, the site is considered capable of satisfying the relevant criteria set out within the policy.

In relation to specific concerns related to the amenity and character principles set out in Policy SSC1, reference should be made to the Council's response regarding Landscape Character and Loss of Village Character.

The site is not considered to be contrary to Policy PGD2 as this policy states that new development with higher net densities should be located in locations served by regular public transport and Active Travel routes or near to services and facilities. St Athan is served by bus service 304 linking the site to both Llantwit Major in one direction and St Athan centre, Barry and Cardiff in the other direction. Although it is recognised that this service runs approximately once an hour, the Council continues to lobby for improvements to multi-

modal transport services. It should be noted that the Council is currently considering tenders for 3 new rural Vale services which may also serve St Athan..

The site itself will deliver additional active travel connections and help strengthen the business case for a transport interchange associated with the development. The site is also located in close proximity to the centre of St Athan which provides a range of services and facilities including retail, a library, GP surgeries, pharmacy and post office. Together with the retail unit proposed as part of the Church Farm development, this would help reduce the need for residents to travel outside the local area to access day-to-day services and facilities. In accordance with Policy SP10, there will also be a requirement to make appropriate contributions towards further sustainable transport provision through the planning process.

The proposal is not considered to conflict with RLDP Policy SP13 and SSC1 or LDP Policy MD4. The Plan is supported by a detailed evidence base, including transport and infrastructure assessments, which consider cumulative impacts at a strategic level. The Infrastructure Plan accompanying the Deposit RLDP sets out the infrastructure requirements for each site, and these requirements are reflected within the Deposit Plan Policies. The cost to the developer for this additional infrastructure has been accounted for within site specific viability testing to ensure that the requirements can be supported by the development, as set out in Background Paper 42A Independent Financial Viability Assessments of Key Sites.

In transport terms, the Plan is supported by a comprehensive Strategic Transport Assessment (STA), which has identified the infrastructure requirements necessary to support planned growth across the Plan including the St Athan area. This ensures that the implications of development are fully considered at a strategic level, and that appropriate mitigation and improvements are identified.

In addition, the RLDP will ensure that where appropriate, individual development proposals contribute toward infrastructure provision through established delivery mechanisms such as planning obligations (s106), site specific infrastructure requirements and/or phasing and coordination with relevant service and utility providers.

Neither RLDP Policy SP6 or SSC1 state that facilities must be in place at the time of an application. Policy SSC1 does however state that proposals for new development within defined settlement boundaries will be permitted where:

“The proposal benefits from existing infrastructure provision or, where necessary, makes provision for new infrastructure without any unacceptable effect on the natural or built environment.”

In line with the policy framework set out in RLDP Policy SP13, where planning obligations are required, a Section 106 agreement will be required which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

The Council therefore considers that the RLDP provides a robust framework that will ensure that communities across the Vale of Glamorgan including Gileston and St Athan will benefit from improved service provision without unduly constraining appropriate sustainable development or development viability.

In terms of conformity with Future Wales, the representation from Welsh Government concluded that the Deposit RLDP is in general conformity with Future Wales and specific policies within it.

The Council acknowledges concerns regarding the site's alignment with the RLDP's climate goals. However, the site is located in close proximity to the centre of St Athan which provides a range of services and facilities including retail, a library, GP surgeries, pharmacy and post office. The site also adjoins St Athan Community Centre, the play area and recreation ground, and benefits from direct connections to the wider settlement via the B4265 and Llantwit Road. The development will also deliver an Active Travel route along the B4265 between the site access and the Gileston Road junction to the east and contribute towards the provision of an Active Travel route between St Athan and Llantwit Major. This would enhance connectivity within St Athan and improve access to surrounding settlements and services. The site is also located within half a mile of a bus stop, with service 304 linking the site to Llantwit Major, Barry and Cardiff.

Although the Council acknowledges that the proposed development will generate additional vehicle movements, as identified within the Strategic Transport Assessment (STA) and site-specific Transport Assessment (TA), the spatial strategy seeks to direct growth to locations that benefit from significant employment opportunities and existing or planned sustainable transport and active travel infrastructure. This approach is intended to reduce reliance on private car travel and support a greater proportion of journeys being undertaken by sustainable modes of transport. It is therefore considered that the site strikes an appropriate balance between delivering identified housing needs and meeting climate objectives.

Issue – Education

- No mention of any further resources for Llantwit Major Comprehensive.
- Additional development of Llantwit Major Comprehensive is essential to meet increased needs.
- Little option for secondary education due to lack of public transport.
- The proposed expansion of St Athan Primary School lacks a guaranteed timeline.
- Demand for additional resources prior to development.
- Introduce clear occupation thresholds tied to delivery of education capacity.

Council Response

In respect of educational provision, the Council has undertaken an assessment of educational need generated by the site in respect of forecast future school places for nursery, primary and secondary education (BP43 Education). This indicates that, based on pupil forecasts, the site would generate the need for 129 secondary and 145 primary school places. At primary level, there is insufficient capacity and a contribution towards additional

places would be required. To meet growing demand for school places in St Athan, St Athan Primary School is allocated for redevelopment and expansion on the site of the existing school. A contribution towards Additional Learning Needs education would also be required due to insufficient capacity. At secondary level, there is sufficient capacity at Welsh Medium and Denominational schools, but additional capacity may be required at the English Medium catchment school, Llantwit Major School, when all developments are considered simultaneously. If this forecast position remains the same at planning application stage, the Council will look to secure a financial contribution towards increased secondary school capacity.

Where planning obligations are required, a Section 106 agreement will be required which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

Issue – Healthcare and Emergency Services

- Lack of access to healthcare within the village.
- Healthcare services are already oversubscribed.
- Additional pharmacies, doctors, dentist would be needed.
- Demand for additional resources prior to development.
- Introduce clear occupation thresholds tied to delivery of healthcare provision.
- Lack of fire, ambulance and police infrastructure.
- No A&E facilities and additional traffic causes concern.

Council Response

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to

existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes St Athan, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented from 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

The indicative masterplan identifies an area of mixed-use development within the larger parcel of the site. This demonstrates how an on-site community facility, as required by the allocation policy, could be accommodated to serve the proposed development. Although the nature of the mixed-use element is unknown at this time and will likely be determined at planning application stage, it could offer the opportunity to deliver community facilities and, if a need is identified by the LHB, further healthcare services for the local area.

The emergency services have been consulted and have not objected to the development. Please refer to the Council's response on Highways Safety concerns in respect of additional traffic concerns.

Where planning obligations are required, a Section 106 agreement will be required which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

Issue – Other Infrastructure

- No current infrastructure to meet the needs of additional population.
- Will add significant strain on existing infrastructure.
- No mention of improving current services to accommodate new residents.
- Additional shops, leisure facilities and community hubs would be needed.

Council Response

Please refer to the Council's response above regarding concerns related to healthcare, emergency, and education service provision in relation to this site.

In respect of community facilities, a contribution towards the provision and enhancement of community facilities in the area will be required. Additionally, the allocation will include the provision of an on-site community building to serve the development and wider area. The exact nature of this will likely be determined at planning application stage.

In terms of other infrastructure, the Council shall seek appropriate contributions from site developers towards enhancing recreational and community facilities. The RLDP will ensure that where appropriate, individual development proposals contribute toward infrastructure provision through established delivery mechanisms such as planning obligations (s106), site specific infrastructure requirements and/or phasing and coordination with relevant service and utility providers. S106 contributions can be sought from developers towards the costs of providing community and social infrastructure, arising from the development.

The identified infrastructure, set out in Appendix 2 of the RLDP, is the result of extensive collaboration with key internal and external stakeholders, including but not limited to transport stakeholders, public health and emergency services, and utility providers.

Issue – Delivery Thresholds

- Infrastructure needs to be in place prior to any development of land.
- No triggers set to ensure that new facilities are in place before occupation of dwellings.

Council Response

Where planning obligations are required, a Section 106 agreement will be required which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

Issue – Loss of Agricultural Land

- Less suitable for new development as an area of farmland and countryside.
- The site consists of Grade 2 (good) or 3a (excellent) agricultural land.

Council Response

The larger area of the site comprises lower-quality (Grade 3b) agricultural land divided into several large irregular shaped field parcels, which are used for grazing, separated by

hedgerows. The smaller parcel consists of a single field which is used for the grazing of animals and is also low-quality agricultural land (Grade 3b).

The site does not comprise Grades 1, 2 or 3a agricultural land and is therefore not classified as Best and Most Versatile (BMV) agricultural land. In this respect, the site is considered suitable for development.

The site is proposed for inclusion within the settlement boundary as part of the RLDP. Consequently, the site is regarded as forming part of the settlement rather than the surrounding countryside.

Issue – Impact on Glamorgan Heritage Coast

- The development would breach the heritage coast policy.
- The development is excessive and would spoil the nature of the heritage coast.

It should be noted that the majority of the site is located outside of the Glamorgan Heritage Coast designation. However, the Council acknowledges that the smaller parcel of the site is located within the designation. This area is allocated for a mix of uses which includes the safeguarding of land for the provision of a new station and rail/bus interchange with associated car parking. 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. In line with the policy framework set out in RLDP Policy DNP3, the development would be located within the settlement boundary and is considered as appropriate development that aligns with national policy objectives for sustainable transport. Additionally, given the scale of housing growth proposed, it is considered that there would be a demonstrated need for this type of development and the significant public benefits would outweigh any potential harm to the Heritage Coast designation.

Issue – Landscape Impact and Loss of Village Character

- Will change the existing settlement and destroy the character of the village.
- Infrastructure needed to support development would change St Athan into a town.
- Changing the nature of the village into a dormitory settlement.
- Size of development is inappropriate and incompatible with the current amenity and character of the village.

Council Response

St Athan is identified as a primary settlement within the Strategic Growth Area and should therefore be a focus for new development. The settlement is adjacent to the largest employment allocation in the RLDP at Bro Tathan Enterprise Zone and is in close proximity to the Employment Regeneration Opportunity Area at the former Aberthaw Power Station. A level of housing commensurate with the area's role as a focus for employment growth is therefore appropriate in order to deliver the key component of the strategy to align locations for new housing, employment, services and facilities to reduce the need to travel.

The provision of new large housing developments in St Athan will also facilitate the delivery of additional facilities including retail and community facilities.

Infrastructure is a key component in delivering sustainable development and placemaking objectives in accordance with Future Wales and PPW. The RLDP will ensure that where appropriate, individual development proposals contribute toward infrastructure provision through established delivery mechanisms such as planning obligations (s106), site specific infrastructure requirements and/or phasing and coordination with relevant service and utility providers. Infrastructure provision is a necessary consideration for sustainable development and is provided to meet the needs arising from housing and employment growth. Therefore, the delivery of such infrastructure would not, in itself, change St Athan into a town.

It is recognised that maintaining the distinctive character and appearance of settlements is an important planning objective. However, it is not considered that the development, in principle, would result in unacceptable harm to the character of St Athan as this site is adjacent to an existing housing estate, in close proximity to the centre of St Athan and therefore would represent an appropriate extension to the settlement. Any future development would be required to respond sensitively to local character through appropriate scale, massing, and height and use of appropriate materials.

A review of the landscape character and visual amenity has been prepared in support of the allocation. Through this analysis, the site is considered to be unremarkable in its character and landscape value and would form a logical location for new development being sited alongside the edge of St Athan and directly adjacent to the Bro Tathan Enterprise Zone, which is identified as a major employment allocation under Policy SP14.1 of the Deposit Plan. Through the design and green infrastructure network identified in the concept masterplan, the assessment considers that the site has the capacity to absorb well-designed and well-planned development without resulting in an unacceptable long-term landscape and visual harm.

As part of any potential planning application, appropriate design and mitigation measures can be further developed and adopted as part of the masterplanning process. This would ensure that the location and layout of uses are sensitively assimilated into the site so that the impact on landscape and visual amenity is minimised.

It is acknowledged that the development would fundamentally alter the character of the land, and in the context of the existing LDP that land is countryside. However, while brownfield land is prioritised where possible, there is insufficient brownfield land (or land in core inner settlement locations) to come close to meeting housing need. Consequently, there are elements of the proposed housing supply that unavoidably require greenfield land and it is unavoidable in those circumstances that the character of the land will change. It is the purpose of the RLDP process to enable submitted candidate sites to be assessed, in order that housing need and growth can be met on the most appropriate sites, where those impacts are managed and minimised as far as possible. The Vale of Glamorgan is located within a National Growth Area in Future Wales, and this RLDP must be consistent with

Future Wales. For the reasons give above, it is considered that the visual and landscape impacts are manageable and are balanced appropriately with the need for growth and housing (esp. affordable housing).

Issue – Community Impact and Safety

- No consideration for people who already live here.
- Risk of anti-social behaviour.
- Additional housing without increased policing resources will place further pressure on officers, reduce the ability to respond promptly to incidents and undermine community safety and cohesion.
- Omission of necessary infrastructure risks the wellbeing of both new and existing residents.

Council Response

The site was first identified as a proposed allocation through the RLDP Preferred Strategy, which was subject to public consultation between December 2023 and February 2024. Following the Preferred Strategy consultation, a placemaking-focussed consultation event was held in October 2024 to present the emerging development proposals and obtain feedback from the local community. These non-statutory engagement events were held specifically to ensure that local residents and stakeholders had the opportunity to consider and provide feedback on the emerging proposals. The proposed allocation, together with further detailed information on the development proposal, was subsequently published as part of the Deposit Plan consultation. Consequently, communities have been able to engage with and comment on the proposed allocation and associated policies at several stages of the plan-making process.

The Council have fully considered all representations made as part of the Deposit Plan consultation and where changes are identified as needed, these have been identified during this process. Although the Council acknowledges the objections to this site, a balanced assessment of all material planning considerations is required to ensure the Plan remains sound and delivers the housing and employment needs identified in the spatial strategy.

While the concerns raised are noted, the provision of additional policing resources falls outside the remit of the planning system. However, residential development proposals are normally subject to formal consultation with the South Wales Police Designing Out Crime Officer who provides advice in respect of incorporating measures to ensure developments are safe and reduce opportunities for anti-social behaviour, whilst encouraging community cohesion.

The Council recognises that new development has the potential to impact upon a wide range of matters which can affect the health and wellbeing of the population. To ensure that new developments consider the health impacts of development, Policy SP5 sets out the

requirements for site promoters to undertake an assessment of the proposed development prior to the submission of a planning application or at the pre-application stage.

All planning applications of 100 dwellings or more will require a Rapid Health Impact Assessment (HIA). A Rapid HIA typically involves a brief investigation of health impacts, including a short literature review of quantitative and qualitative evidence and the gathering of knowledge and further evidence from local stakeholders including relevant Council departments, Cardiff and Vale Local Health Board and Public Health Wales Health Impact Assessment Unit. This screening and/or rapid HIA should identify the likely potential positive and negative impacts of a development proposal on the health and well-being of different population groups, on the wider determinants of health, and on health inequalities. The recommendations identified through this process on how positive health impacts could be enhanced and negative impacts avoided or mitigated should inform the design of a development. Proposals that successfully incorporate measures that contribute towards creating healthy and accessible environments will be supported.

Issue – Flooding and Drainage

- Cumulative impact of hard-standing surfaces raises concerns regarding surface water runoff into the River Thaw catchment area.
- Replacing green fields will create a funnel effect.
- Welsh Water have previously noted concerns regarding the St Athan Wastewater Treatment Works.
- Proof is required that the current system can handle the RLDP's projected flow without increasing overflow events.
- Further development risks "Combined Sewer Overflows" (CSOs) into local watercourses, which contradicts the Council's Nature Emergency declaration.
- Can you provide documents on where DCWW have confirmed upgrades as part of the AMP8?
- Is the West Aberthaw still not programmed and committed?
- Are the plans sufficient to take the larger number of homes now planned?
- Will land purchase and planning consent be needed for the upgrades?
- Will the developers proposing local sites have to pay via S106?
- Increased surface water flooding from loss of farmland.

Council Response

To address sewage capacity issues, DCWW have confirmed that a scheme to accommodate growth is planned for delivery at West Aberthaw Wastewater Treatment Works (WwTW) in the current AMP8 investment period (2025-2030). Currently the scheme is planned for completion in the 2025 to 2030 period. The upgrade will be sufficient for the proposed level of development within the catchment area.

It should be noted that all new and significant developments will have to implement some kind of sustainable drainage system (SuDS) as part of its design and build. These SuDS must be designed and built in accordance with standards published by Welsh Government and

approved by the local authority acting in its role as a SuDS approval body (SAB). The SAB will then have the duty to adopt any compliant systems, serving multiple properties. Detailed consideration of any impact on surface water flooding is normally undertaken at planning application stage, when the site layout, finished ground levels and drainage design are known.

In respect of flood risk, a negligible amount of the site is identified as at risk from surface water flooding. It is considered that this can be addressed through a suitable SuDS scheme to be agreed with the SAB. Furthermore, in their screening of sites, JBA consulting concluded that there are no significant flood risk considerations in respect of the allocation. Nevertheless, a Flood Consequence Assessment will likely be required at the formal planning application stage. The RLDP also requires that any built development on this site should avoid the small area of Zone 3 surface water and small watercourses flooding on the eastern periphery of the site.

The estimated cost and funding sources for these requirements are set out in Appendix B of the Infrastructure Plan (BP44).

Issue – Soundness

- Allocation is unsound.

Council Response

The Council considers that the Plan, its policies and allocations are sound, and this is demonstrated in BP4A *Assessment of Deposit Plan against the Tests of Soundness and Future Wales*. This position is further supported by the Welsh Government's response to the Deposit RLDP, which concluded that the Plan is in general conformity with Future Wales and specific policies within it.

Furthermore, the Plan and its supporting documentation, including the Consultation Report, will be considered by Full Council for approval to submit it to the Welsh Government, who will arrange for an independent Planning Inspector to be appointed to examine the Plan.

The Planning Inspector will consider whether the Plan is fit for purpose by assessing it against three tests of soundness:

- Test 1: Does the plan fit?
- Test 2: Is the plan appropriate?
- Test 3: Will the plan deliver?

The Inspector will consider the written representations that have been made during the Deposit Plan, organise Hearing sessions and then produce a report which considers the issues raised. Ultimately, the Inspector will determine whether the Plan is sound or sound subject to changes, which may consist of redrafted text, the omission or inclusion of a policy, or changes to the proposals map.

Following receipt of the Inspector's report, the Council will be in a position to adopt the RLDP, which will replace the existing adopted Local Development Plan 2011-2026, and it will become the framework against which decisions on planning applications within the Vale of Glamorgan are made.

Issue – Noise and Pollution

- What mitigation steps will be put in place to prevent construction noise and wind-borne pollutants from affecting existing residents?
- Severe noise and light pollution which will affect the rural character and amenity of the Western Vale.

Council Response

Environmental constraints, such as potential noise and air pollution, are monitored through the Integrated Sustainability Appraisal (ISA) process. Site-specific noise and emissions assessments will be required at the full application stage to ensure that there is no unacceptable impact on noise pollution or air quality within St Athan.

Furthermore, RLDP Policy DNP5 *Environmental Protection* establishes a policy framework that resists development proposals where they would result in unacceptable impacts on people, residential amenity, property or the natural environment. The policy sets out a series of criteria against which development proposals will be assessed, including noise, vibration, odour nuisance and light pollution. Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes.

In relation to potential disruption during the construction phase, it is recognised that some temporary disturbance is inevitable with any building works, this will normally be controlled at planning application stage through a planning condition requiring a Construction Environmental Management Plan (CEMP), which will set out detailed measures to manage construction impacts.

Issue – Historic Environment

- Utilise Traditional Architecture Design Codes for all new construction.
- Preserve any WW2 pillboxes on site as protected historical features with educational signage.

Council Response

The Council does not intend to mandate design codes for the site, but at planning application stage, as set out in Policy SP4, major developments will need to prepare Placemaking Statements which consider placemaking principles.

The Council can confirm that there are no listed buildings on the site. There is a scheduled Monument at West Orchard Manor House to the north west of the site and a nearby Listed Building (West House Farm) off Llantwit Road. A heritage impact assessment will be required as part of any future planning application, which will assess the heritage value of any buildings on site, including WW2 pillboxes.

The Historic Environment Record identifies evidence of significant Medieval activity in the immediate vicinity of the site. A desk-based assessment and geophysical survey will be required.

Issue – Layout and Design

- Seek assurance that the green buffer zone would also be extended to include Briarbank.
- Seek assurance that the footpath shown on the masterplan in the top north west corner would be moved eastward to avoid being right next to Briarbank.
- Reduce the housing density until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.

Council Response

The indicative masterplan demonstrates the provision of a green infrastructure network along the boundary of the site. This extends to the far north-western corner of the site and incorporates a substantial area of open space, providing a significant buffer between Briarbank and the proposed residential development. It is important to note that masterplan only extends to the area of land included within the site boundary.

The concept masterplan does show an active travel network flowing through this green infrastructure network, and in particular, around the area of open space proposed in the far north-western corner. As the masterplan is indicative at this stage, the detailed design, layout and routing of footpaths and active travel networks within the site would be considered and determined through the planning application process.

In terms of any future development of the wider allocation, RLDP Policy PGD2 requires a minimum density of 35 dwellings per net hectare for new residential development within the Key, Service Centre and Primary Settlements, in response to their local context. Development below the specified residential density levels will not be permitted unless it is demonstrated that there are significant site constraints that prevent development at the specified levels or where development at the density required would have an adverse impact on the character or appearance of the locality or result in the loss of an important site feature.

Where planning obligations are required, a Section 106 agreement will be required which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage. The exact layout and density are matters that are

also determined at the planning application stage and are not generally influenced by infrastructure delivery.

Issue – Other Matters

- An increase in hard surfaces also increases ambient temperatures compared to grassland, woodland and other green spaces necessitating increased power use for cooling and comfortable living temperatures. Building practices can help mitigate this but only where this is incorporated into sustainable building rules.

Council Response

In response to the climate emergency declared in the Vale of Glamorgan, RLDP Policy CC1 proposes a policy framework that will require new dwellings to exceed the energy standards set out in current Building Regulations and will deliver homes that are net zero in operation. The approach to delivering this should accord with the Energy Hierarchy for Planning, which requires the improvement of fabric standards, energy efficiency and minimising space heating requirements, before installing renewable energy and then offsetting residual energy if required. This is the most sustainable approach and will make an important contribution to addressing fuel poverty and improving social equity. The policy will apply to all applications for new build dwellings.

Council Overall Response

Following a detailed review of the representations submitted in respect of Key Site 5 - Land to the West of St Athan, the Council acknowledges the range and breadth of concerns raised. The Council recognises that the delivery of appropriate infrastructure and mitigation measures will be essential to ensuring that the development is brought forward in a coordinated, sustainable and responsible manner, and these considerations have informed the allocation of the site.

Many of the matters raised relate to detailed design, technical and operational issues that are most appropriately assessed when a planning application is submitted and full development proposals are available. However, for the purposes of plan preparation, the Council is satisfied that there is sufficient evidence to demonstrate that the site represents an appropriate, sustainable and deliverable allocation within the RLDP. The allocation is considered to accord with the Plan's strategy and strategic objectives and is therefore regarded as sound.

HG1.1 LAND TO THE WEST OF PENCOEDTRE LANE, BARRY

Representation ID	Respondent Name	Representation Type
5290	Mrs Linda Donovan [3211]	Object
5752	Jeremy Peter Associates Planning and Development Consultants (Mr Jeremy Peters, Principal) [931]	Comment
5798	Mrs Myra Corsar [3037]	Object
6135	Barry & Vale Friends of the Earth [708]	Object
6659	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6977	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

A total of 6 representations were submitted in respect of HG1.1 Land to the west of Pencoedtre Lane, raising several issues associated with the development of the site. The issues are summarised below and full Council response to the issues is set out.

STATUTORY CONSULTEE RESPONSES

6659 - Natural Resource Wales

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 Suitable Alternative Natural Greenspace (SANG) to reduce recreational pressure on adjacent sites of biodiversity importance.

Council Response

The site's proximity to Barry Woodlands SSSI is recognised. The closest part of Pencoedtre Woodland area of Barry Woodland SSSI is located approximately 200m from the site. Whilst the part of the SSSI at Pencoedtre West is not publicly accessible, it is noted that NRW have previously raised concerns about unauthorised and unmanaged public access.

The importance of alternative areas of open space to reduce recreational pressure on the SSSI is acknowledged. There will be a requirement for the onsite provision of open space. It should also be noted that the wider area is well served by alternative open space, with a large open area of informal open space with an existing footpath network to the south of the site and the more formal Merthyr Dyfan Recreation Ground to the south west.

In order to ensure that the proximity to the SSSI is full recognised as a constraint, particularly in light of other comments that NRW have raised, it is proposed that reference is made to the proximity to the Barry Woodland SSSI in Appendix 2 of the RLDP and BP44 Infrastructure Plan. With regards to protected sites, as set out in the wider response to representations

from NRW, it is agreed that the policy should reference the proximity to the SSSI and the need for appropriate alternative open space. However, it should be noted that both Walters Farm SSSI and the parcels of land comprising Barry Woodlands SSSI are privately owned sites with no public rights of way. Any unauthorised access on the SSSI land would be the responsibility of NRW working with the relevant owners under management agreement if necessary to control unauthorised access.

Proposed change

Under the key site issues section of Appendix 2 and BP44 Infrastructure Plan, reference the following:

- The site is within 200m of Barry Woodland SSSI and the provision and/or enhancement of appropriate alternative open space on site and/or in the area to reduce recreational pressure on the SSSI will be required.

6977- Dwr Cymru Welsh Water

Water Supply - The water network can supply the proposed development. 125mm, 450mm, 10” & 36” diameter watermains cross the site.

Wastewater - The public sewerage network can accept potential foul flows from this development site.

Wastewater Treatment Works - Cog Moors WwTW has capacity to accept foul flows from the proposed development.

Council Response

The comments are noted. References to the 125mm, 10” and 36” diameter watermains crossing the site are already in the Infrastructure Plan. However, there is no reference to a 450mm watermains crossing the site.

Proposed change

Make reference to the 450mm watermains crossing the site in Appendix 2 and BP44 Infrastructure Plan.

Also reference that the water network can supply the proposed development and the public sewerage network can accept potential foul flows.

COMPOSITE RESPONSE

<u>Issue - Traffic Congestion and Access Routes</u>

- Road infrastructure is struggling without adding more to it
- Development should be accessed off Port Road
- Proposals should maintain existing pedestrian/cycle routes

Council Response

The Council acknowledges that HG1(1) and other housing developments from the RLDP have potential to increase traffic flows. Accordingly, in preparing the Deposit Plan, the Council has sought to identify the potential transport impacts of the proposed allocations and the mitigation measures that will be required from site promoters to address those impacts.

In considering the traffic implications associated with the large housing site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of development proposals on the strategic transport network and to identify mitigation measures where necessary. The STA is also supplemented by evidence from site-specific Transport Assessments. The full assessment is set out in background evidence documents BP14 Strategic Transport Assessment - Stage 1 and BP14A Strategic Transport Assessment - Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a comprehensive review of the baseline transport conditions in the Vale of Glamorgan and examines the existing transport infrastructure and its current operational state, including the strategic highway network, using various data sources.

The Stage 2 STA comprises a series of technical notes on Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation, and Cost Estimation and Funding Mechanisms.

The STA utilises the South East Wales Transport Model (SEWTM), which is maintained and updated by Transport for Wales. The model covers the Cardiff Capital Region and provides a recognised strategic modelling basis for assessing the cumulative impacts of strategic housing allocations on the strategic highway network. The assessment includes two forecast scenarios:

- 2036 Base Scenario - representing 2022 SEWTM base flows factored to 2036 using TEMPro-derived growth rates, excluding traffic from the RLDP strategic housing sites.
- 2036 RLDP Scenario - representing the 2036 Base flows plus traffic associated with identified strategic housing sites.

As the study utilises a recognised regional transport model, applies forecast background growth to 2036 in line with industry standard procedures, and separately tests the cumulative impact of the strategic housing allocations, the traffic data used in the STA is considered comprehensive, robust and sound for plan-making.

Technical Note 5 of the STA provides a detailed assessment of the forecasted cumulative impact of the proposed RLDP housing allocations on 17 highway network junctions where the SEWTM outputs, together with professional judgement and local knowledge, indicated

that the cumulative impact of RLDP sites could have a material effect on highway operation. This has considered key junctions in the Barry area.

Where the modelling shows that the cumulative impact of RLDP strategic housing sites will have a material impact on junction capacity (for example, Weycock Cross roundabout), mitigation measures will likely be necessary and the site may be required to make a financial contribution towards this.

Following detailed modelling, Technical Note 6 indicates that, in the 2036 Base scenario without RLDP strategic housing traffic, Weycock Cross roundabout would be nearing practical capacity, with maximum AM and PM RFC values of 88%. When the cumulative impact of the RLDP strategic housing sites is included, this increases to 102% in the AM peak, which is over capacity, and 97% in the PM peak, which is close to capacity. This represents a worsening of performance compared with the 2036 Base scenario. The STA therefore identifies a material impact at this junction and mitigation is considered necessary.

At planning application stage, there will be a requirement for a site specific Transport Assessment.

The Highways department have indicated that the preferred access point would be from Pencoedtre Lane. Access would not be acceptable off Port Road due to the close proximity of the existing signalised junction onto Pencoedtre Lane.

There is an existing active travel route on Port Road, and this will be maintained and potentially enhanced as part of any development.

Issue - Ecological Value of the area

- Loss of woodland/hedgerows
- Harm to local wildlife
- Surveys need to be carried out at the appropriate time
- Proximity to Barry Woodlands (SSSI)

Council Response

The Council notes concern in regard to HG1.1 and its ecological features.

The site is supported by a Preliminary Ecological Appraisal, conducted in February 2025, the findings of which will inform future revisions to the layout. The PEA also identifies the need for further survey work to be undertaken at planning application stage. Any species surveys that are required (e.g. bats, dormouse, reptiles and invertibrates) will need to be carried out by qualified ecologists at an appropriate time of year. The development will be required to show levels of mitigation and compensation measures in environmental and ecological terms.

Issues - Alternative uses

- The site should be used as a replacement for St Richard Gwyn rather than for housing.

Council Response

The respondent considers that the HG1.1 site should be used as a replacement for St Richard Gwyn Roman Catholic High School, instead of the alternative proposal, which is rebuilding the school on its current site (Policy CF3.3). This is due to an area of the school site being identified within a flood zone, as well as perceived poor active travel routes to the St Richard Gwyn site. The respondent's view is that the Pencoedtre Lane site represents a more appropriate alternative, given its former use as a school site.

The Council notes the comments related to flooding in the area and concerns about active travel routes to St Richard Gwyn school. However, the redevelopment of St Richard Gwyn on its existing site received planning permission in April 2024 and is now under construction. The matters in respect of flood risk and active travel were considered as part of the planning application process.

Issue - Noise and disruption from the development

- Construction noise and disruption likely

Council Response

The Council acknowledges the concerns around noise and disruption during the development process. There will be a requirement for a Construction Environment Management Plan (CEMP) to be agreed prior to commencement to ensure that construction is managed in a responsible way reducing impacts for existing residents.

The CEMP would set out measures to manage and minimise the impact of construction activities on neighbouring residents, including controls relating to working hours, noise, dust, traffic movements, site compounds and contractor management. Compliance with the approved CEMP would help ensure that construction activities are undertaken in a responsible manner and that impacts on the amenity of existing residents are reduced as far as reasonably practicable.

HG1.2 LAND AT THE MOLE, BARRY

Representation ID	Respondent Name	Representation Type
4524	Mr J Cart [2836]	Object
6660	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6682	South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]	Comment
6978	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

A total of 4 Representations were submitted in respect of HG1.2 Land at The Mole, raising serval issues associated with the development of the site. The issues are summarised below and full Council response to the issues is set out.

STATUTORY CONSULTEE RESPONSES

6660 - Natural Resources Wales

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.

Council Response

The comments are noted. Planning permission has recently been granted for a mixed use scheme including housing.

The application was supported by a project level HRA. NRW were consultees on the application, where it was concluded that the HRA demonstrates that with appropriate mitigation, there would be no adverse effect on the integrity of the Severn Estuary SAC, SPA and Ramsar site.

The Council's Shared Regulatory Services were also consulted on the planning application in respect of contamination. They advised that the submissions have identified contaminants of concern that will require remediation to make the site suitable for use. They advise that satisfactory approaches for remediation are detailed but a further remediation and verification will need to be undertaken. They also note that ground gas assessment is ongoing and provide advice with regard to soils/site won materials. Noting this they request conditions be attached to any permission given, relating to a ground gas assessment and protection measures; remediation and verification plan for contamination; associated remediation/verification being undertaken; unforeseen contamination; imported

soils/aggregates and use of site won materials. An informative about contamination is also requested.

6682 - South Wales Police

South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.

Council Response

The comments are noted. Planning permission has recently been granted for a mixed-use scheme including housing. South Wales Police consulted and a detailed response from the Designing Out Crime Officer was received.

6978 – Dwr Cymru Welsh Water

Water Supply - Dwr Cymru Welsh Water has made representations on planning application ref 2023/00051/HYB. A hydraulic modelling assessment (HMA) will be required. A 160mm diameter watermain, and a 3” diameter abandoned watermain cross the site.

Wastewater - Dwr Cymru Welsh Water has made representations on planning application ref 2023/00051/HYB. The public sewerage network can accept potential foul flows from this development site.

A 1050mm surface water sewer crosses the site.

Wastewater Treatment Works - Dwr Cymru Welsh Water has made representations on planning application ref 2023/00051/HYB. Cog Moors WwTW has capacity to accept foul flows from the proposed development.

Council Response

The comments are noted. Planning permission has recently been granted for a mixed-use scheme including housing. Dwr Cymru Welsh Water were consultees on the application.

INDIVIDUAL RESPONSES

4524 - Cart - object

A number of species such as the peregrine falcon, kingfisher, migrating grebes and other nesting birds are on the planned site which make a lot of them protected species. What are the plans if any to protect these? The RSPB are going to be contacted in regards of this.

Council Response

A hybrid planning application (2023/00051/HYB) has been submitted for The Mole which involves full planning permission for engineering works to raise the existing ground levels and outline permission for a mix of uses including up to 100 dwellings. The application was

originally submitted in 2023 but substantial revisions to be scheme were submitted in April 2026 and consultees were reconsulted on the amended details. The revised application was supported by a Preliminary Ecological Appraisal and a botanical survey and the potential impact on biodiversity was considered as part of the application process.

HG1.3 – LAND AT HAYES LANE, BARRY

Representation ID	Respondent Name	Representation Type
4555	Hayley Graham [2852]	Object
4788	Mrs Joanna Phillips [2949]	Comment
6661	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6779	Persimmon Homes (East Wales) [1068]	Object
6912	Barratt Redrow Homes [2669]	Object
6979	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

6 Representations were submitted in respect of the Housing Allocation HG1(3) Land at Hayes Lane (3 objections and 3 comments), raising a number of issues associated with the development of the site.

Representations objecting to the site seek the deletion of HG1.3 from the RLDP.

The issues raised have been summarised below and full Council responses have been provided to each issues raised.

Following the consultation on the Deposit RLDP, a full planning application was submitted for 70 affordable dwellings. This was approved in July 2026. However, it is currently subject to a Judicial Review in respect of the decision-making process.

STATUTORY CONSULTEE RESPONSES

6979 Dwr Cymru Welsh Water

Water Supply - Dwr Cymru Welsh Water has made representations on planning application ref 2026/00056/FUL. A hydraulic modelling assessment (HMA) will be required. A 6" diameter watermain and a 6" diameter abandoned watermain cross the site. Wastewater - Dwr Cymru Welsh Water has made representations on planning application ref 2026/00056/FUL. The public sewerage network can accept potential foul flows from this development site. Wastewater Treatment Works - Dwr Cymru Welsh Water has made representations on planning application ref 2026/00056/FUL. Cog Moors WwTW has capacity to accept foul flows from the proposed development.

Council response

The comments are noted. Planning permission has recently been granted for 70 affordable dwellings. DCWW were consulted on the application and made comments.

6661 - Natural Resources Wales

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.

Council response

The comments are noted. Planning permission has recently been granted for 70 affordable dwellings.

The Council's Shared Regulatory Services were also consulted on the planning application in respect of contamination. They advised that the contamination assessment did not identify contaminants. A ground gas assessment was also submitted.

NRW were also consulted on the application and required a condition relating to unforeseen ground contamination.

COMPOSITE RESPONSE

COMMENTS/OBJECTIONS

Issues Raised

- Proximity to Ty Hafan children's hospice
- Loss of employment land.
- Unsustainable location - improvements needed to public transport and community facilities

Council Response

The Council recognises the importance of protecting residential amenity for the residents of Ty Hafan. The site is approximately 400m away with a woodland buffer between the two areas. The impact upon the amenity of neighbouring residential properties was considered as part of the planning application and concluded to be acceptable.

The site at Hayes Lane was allocated as an employment site in the adopted LDP 2011 - 2026 and before that as employment land in the Unitary Development plan 1996 – 2011. There have been no planning applications for industrial use since the 1990s and no recent interest in bringing the site forward for B1, B2 or B8 use.

The site was considered as part of an Employment Land Review. The study recognised that the land adjacent had been brought forward for housing, which will impact on the nature of the employment uses that would be acceptable on the site i.e. there would be concern about B2 uses. This site is also not the only available employment land in the area with vacant land and development opportunities across the Atlantic Trading Estate and Barry Docks that can be taken up and developed for employment uses. These other designations would have less of an impact on existing residential development due to their distance. Therefore, it is also not considered that reallocating this land would hinder the Vale's ability to attract economic investment.

It is acknowledged that concerns have been raised with regard to the location of the site and its accessibility to local services. Occupiers of the site would have good access to employment opportunities within nearby industrial estates whilst there are regular bus services available at Hayes Point and Bendricks that would provide access to services within the wider area. To this end, the site is considered to be suitably located to accord with the provisions of the RLDP.

The site is located approximately 1.3km from Sully and linked to both Sully and Barry by the 88 and 94 bus routes, which run a service each way approximately every 1 hour 20 minutes and additionally provide access to Cadoxton and Barry Docks train stations as further sustainable transport options. Some services in sully such as Sully primary School, and a shop are accessible on foot, with google maps stating that both locations are around a 30 minute walk from the site however it is acknowledged this not be feasible for all residents. Whilst it is acknowledged that Cadoxton Station is located 3.8km north of the site, this is considered accessible via the aforementioned bus services, and the site is not considered to be reliant on rail access alone in order to be regarded as sustainably located.

While the site is in a sustainable location adjacent to the existing settlement boundary (and proposed to be allocated within the RLDP), residents would potentially be reliant on local transport facilities and consequently, a sustainable transport contribution is considered reasonable and proportionate to the need arising from the development. This has been considered as part of the planning application process where a financial contribution towards active travel has been secured.

HG1.4 LAND AT NEPTUNE ROAD, BARRY

Representation ID	Respondent Name	Representation Type
5591	Mr James Brown [1465]	Object
6662	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6980	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

3 Representations were submitted in respect of HG1.4. Two representations were from statutory consultees, and one representation objected to the development, which the Council has responded to below.

STATUTORY CONSULTEE RESPONSES

Rep 6662 - Natural Resource Wales

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.

Council Response

The comments are noted. This requirement will be referenced in the Appendix 2 of the RLDP and BP44 Infrastructure Plan.

Proposed change

Include the following points under the key site issues and constraints in the Infrastructure Plan and Appendix 2 of the RLDP:

- 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.

Rep 6980 – Dwr Cymru Welsh Water

Water Supply - A hydraulic modelling assessment (HMA) will be required. A 150mm diameter watermain and 2 x 160mm watermains cross the site.

Wastewater - The public sewerage network can accept potential foul flows from this development site. A 300mm diameter surface water sewer crosses the site.

Wastewater Treatment Works – Cog Moors WwTW has capacity to accept foul flows from the proposed development.

Council Response

The comments are noted. The WwTW capacity is already referenced in Infrastructure Plan. However, references to water supply and sewerage network capacity should be included.

Proposed change

Include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- Water Supply - A hydraulic modelling assessment (HMA) will be required. A 150mm diameter watermain and 2 x 160mm watermains cross the site.
- Wastewater - The public sewerage network can accept potential foul flows from this development site. A 300mm diameter surface water sewer crosses the site.

INDIVIDUAL RESPONSE

5591 – Brown – Object

Concern that land should be utilised for employment as was in the original masterplan.

Council Response

At Preferred Strategy stage, it was concluded that, as the site is currently allocated for a hotel and B1 offices in the Vale of Glamorgan's adopted Local Development Plan 2011-2026, "the suitability of the site will depend on an assessment of whether these allocated uses are still required in this location."

Ultimately, it is essential that allocations within the RLDP are deliverable. Given the lack of interest and viability concerns associated with the site for either hotel or office use, consideration was given to whether alternative uses would be more appropriate. In light of the identified need for affordable housing in the area, and the opportunity this site presents to deliver 40 affordable homes on a brownfield site in a sustainable location, it is considered, on balance, that the site should be reallocated for housing instead.

HG1.5 LAND BETWEEN THE NORTHERN ACCESS ROAD AND EGLWYS BREWIS ROAD (SITE C - CENTRAL PARCEL)

Representation ID	Respondent Name	Representation Type
5195	Welsh Government (Housing and Regeneration Directorate) [3162]	Support
5255	Llantwit Major Town Council (Clerk) [230]	Support
5565	Ms Samantha Hall [1432]	Object
5635	Mr Derek Massey [3323]	Comment
5726	Mr Graeme Smith [3029]	Comment
5823	Mrs Julie Massey [3390]	Comment
5829	Mr Matthew Cubley Pritchard [3367]	Object
5965	Mr Philip Taylor [3439]	Object
6207	Mr Colin Arnold [2871]	Object
6227	Mrs Jan Arnold [3499]	Object
6360	Mervyn Page [3558]	Object
6389	Llanmaes Community Council (Mrs C Alexander, Clerk) [240]	Comment
6663	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6780	Persimmon Homes (East Wales) [1068]	Comment
6913	Barratt Redrow Homes [2669]	Comment
6982	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

A total of 16 Representations were submitted in respect of HG1(5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel) (2 Support, 8 comments and 6 objections), raising a number of issues associated with the development of the site.

Individual statutory consultee responses from NRW and DCWW have been addressed first.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. The key issues raised include infrastructure capacity, highways, over-development, impact on residential amenity alternative uses for the site and timescales for delivery.

STATUTORY CONSULTEE RESPONSES

6663 - Natural Resources Wales

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 master planning 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.

Council Response

Comments are noted in respect of the site constraints. Appendix 2 already referenced flood risk in respect of the Boverton Brook but does not specifically refer to impacts on the watercourse and buffers. Appendix 2 should be included to reference this.

Proposed change

Add the following sentence to Appendix 2 in the section on Boverton Brook:

Any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

6982 - Dwr Cymru Welsh Water

- Water Supply - A hydraulic modelling assessment (HMA) will be required.
- Wastewater - A hydraulic modelling assessment (HMA) will be required.
- Wastewater Treatment Works - Llantwit Major WwTW has capacity to accept foul flows from the proposed development.

Council Response

Comments are noted in respect of the site constraints. Appendix 2 currently referenced the Wastewater Treatment Works capacity but not the requirements for hydraulic modelling for wastewater and water supply. This should be added into Appendix 2.

Proposed change

Add the following constraints to Appendix 2:

Hydraulic modelling assessments will be required for the water supply and wastewater.

INDIVIDUAL RESPONSES

5195 - Welsh Government - Housing and Regeneration Directorate (Carney Sweeney) – Support

We write to support: Housing allocation HG1(5) at “Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)” for 235 dwellings;

Each of these sites is owned by the Welsh Government. Sites A and B were subject of outline planning applications in 2020 for 140 and 100 dwellings respectively (LPA refs: 2020/00351/OUT and 2020/00352/OUT). These applications were resolved to be approved subject to s106 agreements in January 2022. At that time the Welsh Government were seeking to purchase Site C in order to enable comprehensive development of the parcels. Progress was delayed by the need for a Lands Tribunal case which was determined in the Welsh Government's favour in October 2024, following which purchase of Site C was able to be completed in 2025.

Now that all sites are in single ownership, it is the Welsh Government's intention to commission a combined masterplan covering each of the three sites (the tender for which is due to be issued very shortly) followed by disposal of the site(s) on the market while achieving maximum public values. The Land team's aim is to increase the number of homes, including social housing, delivered across Wales while maximising public benefit. Their aim is to deliver exemplar developments which meet strong placemaking principles including active travel. The landholdings between the Northern Access Road and Eglwys Brewis Road (sites A to C) present an excellent opportunity to meet these aims

Council Response

Comments and support are noted.

5255 - Llantwit Major Town Council - Support

Llantwit Major Town Council considers that the areas identified for the development of Llantwit Major and its immediate localities are appropriate for the future development of the town. The allocation of an area between the Northern Access road and the Eglwys Brewis Road as a major land bank enables future housing developments but we question whether the infrastructure will be appropriate.

Council Response

Comments and support are noted.

COMPOSITE RESPONSE

<u>COMMENTS/OBJECTIONS</u>

<u>Issue - Pressure on Local Services & Infrastructure</u>

- Whether Llantwit Major, St Athan, and surrounding areas can cope with increased population
- Healthcare, policing, local amenities under strain
- Lack of job opportunities and local amenities (e.g., GP surgeries)

Council Response

The Council acknowledges concerns regarding pressure on local services. These matters are addressed through the Infrastructure Delivery Plan (IDP), which sets out requirements for healthcare, education, active travel, utilities, and community facilities to support planned growth.

Future planning applications for Site C will be required to demonstrate adequate mitigation, potentially through Section 106 contributions.

Issue - Traffic, Highways, and Access Concerns

Several representations highlight significant transport issues:

- Existing roads and junctions cannot support large increase in vehicles.
- Traffic impacts on Picketston Lane which is a single carriageway, no footpath, driveways opening onto roads.

Council Response

The Council recognises the concerns raised around traffic impacts and confirms that detailed Transport Assessments (TAs) will be required at planning application stage. These assessments must model traffic generation, identify necessary on and off-site mitigation measures, and consider the relationship with adjacent housing sites.

It should be noted that access to the site would be from the Northern Access Road, which was constructed as an access road to the Bro Tathan Enterprise Zone and the housing sites and was therefore constructed to accommodate vehicles from the developments in the area.

The TA would consider potential impact on the local highway network including Picketston Lane, and where highway improvements or new active-travel infrastructure are necessary, these will be secured through planning obligations.

Issue – Over-development & Scale of Housing Proposed

- Too many houses for the area – concerns about character change and lack of demand
- Negative impact on countryside, sustainability, and food security
- Smaller-scale development distributed more evenly through the Vale

Council Response

The housing requirement in the Replacement LDP reflects the need to deliver a sustainable supply of new homes across the Vale of Glamorgan, in accordance with the RLDP strategy. Site HG1(5) C forms part of a wider strategic land parcel already partially permitted for

residential development (Sites A and B) and is an existing LDP allocation that has been taken forward to the RLDP.

The scale of development has been assessed through the LDP process and is necessary to support long term housing needs. In terms of food security, the site and adjoining sites A and B are not in agricultural use and are not classes as being best and most versatile (BMV) agricultural land. Detailed design and masterplanning requirements will ensure the scheme delivers high quality placemaking, landscape integration, and an appropriate scale relative to local context.

Issue - Impact on Residential Amenity

- Site boundary too close to existing homes resulting in loss of privacy, property devaluation and residential safety

Council Response

While property value is not a material planning consideration, the protection of residential amenity is a material planning consideration. Accordingly, a masterplan for Sites C will be required to incorporate suitable separation distances, landscaping, and design solutions to protect neighbouring residential, safeguard privacy and reduce visual impacts.

Issue - Suitability of Site for Uses Other Than Housing

- The site is more suitable for commercial/industrial uses due its proximity to the Major Employment Allocation at Bro Tathan.

Council Response

The site's allocation for housing reflects strategic assessments of employment need, land availability, and the spatial distribution of residential opportunities across the Vale. Adjacent employment allocations remain safeguarded and sufficient to meet projected economic and job-growth requirements. Residential development at this location is consistent with the RLDP strategy and objectives, supporting sustainable growth near existing infrastructure, employment opportunities and transport connections.

Issue - Lack of Progress & Delivery Concerns

- No significant progress has been made to deliver Sites A, B, or C despite long-standing allocations in the adopted LDP.
- The Council's housing trajectory for Site C (start in 2028/29) is unrealistic as there is– no application submitted and no viability/design/infrastructure evidence .
- LDP needs more flexibility or contingency sites.

Council Response

The Council recognises that progress on Sites A and B has been slower than anticipated, largely due to land ownership matters relating to site C. The Welsh Government's Housing and Regeneration Directorate, who own the site, have confirmed that they have secured their single ownership of all three parcels and are committed to bringing all three parcels for development in accordance with the timescale specified within the housing trajectory. In respect of non-delivery, the Council has made an allowance for this which is embedded into the RLDP housing requirement as detailed within the Housing Supply and Housing Trajectory Background Paper. It is therefore considered that there is sufficient flexibility within the trajectory to ensure housing delivery and account for potential slippage. The Council will continue to collaborate with all landowners and developers to support timely delivery in line with their proposed timescales.

Council Overall Response

Following detailed review of the representations submitted in relation to Site HG1(5), the Council acknowledges the breadth of issues raised, including infrastructure capacity, highways, over-development, impact on residential amenity alternative uses for the site and timescales for delivery.

Many of the matters raised relate to detailed design, technical and operational issues that are most appropriately assessed when a planning application is submitted and full development proposals are available. However, for the purposes of plan preparation, the Council is satisfied that there is sufficient evidence to demonstrate that the site represents an appropriate, sustainable and deliverable allocation within the RLDP. The allocation is considered to accord with the Plan's strategy and strategic objectives and is therefore regarded as sound.

HG1.6 LAND ADJOINING ST ATHAN ROAD, COWBRIDGE

Representation ID	Respondent Name	Representation Type
4724	Mrs Kirsty Heald [2899]	Object
5082	Miss Diane Hills [2135]	Object
5238	Mr David Keith Brown [2195]	Object
5260	Dr melanie jones [1799]	Comment
5273	Anne Hordley [1669]	Object
5274	Laurie Griffiths [3200]	Object
5609	Mr Robin Woods [3307]	Object
5613	Cowbridge with Llanblethian Town Council (N Alexander, Chief Officer) [2545]	Comment
5659	Mr Simon Heald [3328]	Object
5722	John Jemmett [3342]	Object
5732	Mrs Dawn Jones [1734]	Object
5769	Mrs Lucine Higgins [2089]	Object
5793	Mrs Patricia Williams [1310]	Object
5892	Anna Westacott [3416]	Object
5904	Ruth Chapman [3421]	Object
5915	Mr Ian Jones [1365]	Object
5922	Lindsey Bulleid [2240]	Object
5967	Lindsey Bulleid [2240]	Object
5975	Lindsey Bulleid [2240]	Object
6016	Mr Malcolm Wilson [1007]	Object
6056	Michael Higgins [1663]	Object
6072	Mrs Krys Hunt [2259]	Object
6088	Mr Paul Crellin [3464]	Object
6092	H S & H A Simpson [3471]	Object
6093	Dr Kelly Simpson [3474]	Object
6264	Miss Jane Brown [1309]	Object
6313	Dr R Simpson [1308]	Object
6348	Mr Stephen Pearce [1306]	Object
6386	Mrs Lisa Holtam [2316]	Object
6403	Mr Phillip Holtam [2319]	Object
6404	Mrs Pamela Kay [3572]	Object
6415	Mr John Kay [3576]	Object
6428	Mr James Bulleid [3584]	Object
6460	Tim Griffiths [3591]	Object
6479	Mrs Helen Devereux [1627]	Object
6482	Mrs Caroline Cjsochovsky [3603]	Object
6521	Mrs Patricia Anne Williams [2152]	Object
6523	Mike and Hilary Carney [3620]	Object
6554	Mrs Kathy Williams [3634]	Object
6559	Thaw Valley Group (Mr Michael Carney) [1406]	Object
6614	Mrs Dawn Jones [1734]	Object
6664	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment

6983	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

A total of 43 representations were submitted in respect of the HG1.6, raising several issues associated with the development of the site. The issues are summarised below and full Council response to the issues is set out.

The key issues raised including highways, public transport availability flood risk, visual impact and the Special Landscape Area designation, ecology, open space, the loss of agricultural land, density and infrastructure capacity. Responses also referenced conformity with the Cowbridge Placemaking Plan, the availability of other sites, the need for housing, the candidate site assessment process, affordable housing and previous planning history.

Individual statutory consultee responses from Natural Resources Wales and DCWW have been addressed first.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

It should be noted that the site forms part of an allocation in the adopted LDP and is subject to a full planning application for to 105 dwellings (2022/00958/FUL).

STATUTORY CONSULTEE RESPONSES

6664 - Natural Resources Wales (NRW) - Comment

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.

Council response

The comment is noted. This was not raised as part of NRW's response to the planning application. However, for consistency with other sites, reference will be made in Appendix 2 of the RLDP.

Proposed Change

Under key site issues and constraints amend as follows:

- The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

6983 - Dwr Cymru Welsh Water - Comment

- Water Supply - Dwr Cymru Welsh Water has made representations on planning application ref 2022/00958/FUL. A hydraulic modelling assessment (HMA) will be required.
- Wastewater - Dwr Cymru Welsh Water has made representations on planning application ref 2022/00958/FUL. The public sewerage network can accept potential foul flows from this development site.
- A 65mm diameter pressurised rising main sewer crosses the site.
- Wastewater Treatment Works - Dwr Cymru Welsh Water has made representations on planning application ref 2022/00958/FUL. Cowbridge WwTW has capacity to accept foul flows from the proposed development.

Council response

The comments are noted and will be considered as part of the planning application process. These comments are included within the Infrastructure Plan of Appendix 2 of the RLDP.

COMPOSITE RESPONSE

COMMENTS/OBJECTIONS

Issue – Need for housing

- No need for additional housing in Cowbridge.
- Further development in Cowbridge would be irresponsible.
- Houses on other sites (e.g. Clare Gardens) are still available/ not selling.
- Other brownfield sites are available, such as Llandow airfield.
- What proportion of homes will be for those with disabilities?

Council response

The Council notes the comments raised regarding the need for housing in and around Cowbridge. New housing is required to meet forecast increases in the population and in household formation. The housing requirement and the assumptions that have informed it are set out in BP7 Housing and Employment Growth Options and BP8 Demographic Evidence.

Cowbridge is a service centre settlement within the Sustainable Growth Area and the level of development proposed is considered commensurate with the role and function of the settlement. It should also be noted that this the site is already allocated in the adopted LDP where the previous Inspector considered that the allocation of this site alongside other sites in Cowbridge was justified.

The Council's latest Local Housing Market Assessment 2023 (Background Paper 10B) identifies an affordable housing need within the ward of Cowbridge, of 230 units, whilst the Council's housing waiting list (February 2026) indicated that there were 367 households registered for the Cowbridge ward. The development will include a percentage of affordable housing which will assist in the meeting this housing need.

In respect of the type of dwellings, the affordable housing mix will be informed by the housing department's evidence on dwelling types and sizes. It should be noted that all affordable homes must meet the Welsh Government's Development Quality Requirement (DQR) which include specific accessibility requirements.

Several representations have raised concerns regarding the Clare Gardens development at Land North West of Cowbridge, noting the slow pace of market sales. Housing delivery and sales have taken longer than anticipated due to the Council issued a Temporary Stop Notice on 31st May 2024 to prevent any further development on Phase 2, as the developer had not discharged drainage conditions on the relevant planning consents and due to concerns raised with the Council's Drainage Team regarding flooding on site. As a result, all works on Phase 2 of the development ceased in May 2024, until the relevant drainage conditions were discharged in November 2025. Delivery rates have therefore been low due to the Temporary Stop Notice, rather than as a result of market conditions.

Representations have also referenced the availability of brownfield sites as a more appropriate alternative, with a number of respondents specifically citing Candidate Site 448 — Land at Llandow Airfield. This site was assessed and ruled out during the RLDP process at Preferred Strategy stage, as documented in Background Paper BP18 Candidate Site Assessment. The assessment concluded that the site is a significant distance from both Sigingstone and Llandow, with no functional relationship to either settlement. Given its scale and lack of connection to any existing settlement, the site was determined to be more akin to a new settlement. As set out in Planning Policy Wales (PPW), new settlements extend beyond the boundary of a single local authority and must be brought forward through a Joint Local Development Plan, Strategic Development Plan, or Future Wales — meaning the Vale of Glamorgan Council is not in a position to allocate the site unilaterally through the RLDP process.

Issue – Candidate site assessment methodology

- Inconsistencies in the scoring of the candidate site assessment
- Views that candidate sites 455 and 367 are more appropriate sites and were scored deliberately more harshly

Council response

The Council notes the comments received relating to the candidate site assessment process. It is important to clarify that all sites previously allocated within the adopted LDP have been re-appraised through the candidate site assessment process before being considered for allocation within the Deposit RLDP. The methodology by which sites have been assessed is set out in full within Background Paper BP16 — Candidate Site Assessment Methodology. All submitted sites are assessed against a number of criteria, as detailed in BP16, and scored through a Green, Amber, and Red system to determine their perceived suitability for development. It should be noted that this process is not purely quantitative in nature; in appraising sites, officers have applied professional judgement alongside key factual information to arrive at what is considered the most appropriate outcome in respect of each relevant criterion.

In relation to Land Adjoining St Athan Road specifically, it is noted that a planning application has already been submitted to the Council in respect of the site. Should the site be allocated through the RLDP, any development would still be required to satisfy the full requirements of the planning application process, including assessment by the responsible planning officer and consultation with relevant technical departments, including Highways and Drainage. The Council is therefore satisfied that the overall process is sufficiently comprehensive in terms of the site's screening and assessment.

The Council further notes that representations have referenced other candidate sites in the Cowbridge area, specifically Candidate Sites 455 and 367, with some respondents suggesting these sites were assessed more harshly by comparison. Whilst the Council understands that the proximity of these sites to Cowbridge has led respondents to draw comparisons with Land Adjoining St Athan Road, it is important to emphasise that within the Candidate Site Assessment Methodology that each site is judged on its own individual merits against the established criteria. The full detail of the assessment process, including the outcomes for all sites assessed, is set out within BP16 and BP18, which provide comprehensive justification for the conclusions reached.

Issue - Public Rights of Way

- Windmill Lane is a private road.
- There is a public right of way through the field.
- The Llanquian Close path is insufficient width.

Council response

The Council notes that representations refer to the possibility of a secondary access being provided via Windmill Lane. For the avoidance of doubt, the Council confirms that no such vehicular access is proposed through Windmill Lane.

The existing public right of way through the site between St Athan Road and Windmill Lane is proposed to be maintained as part of the planning application.

The planning application also identifies utilisation of existing pedestrian connections between the site and Llanquian Close and also between the site and Bessant Close. While it is acknowledged that the paths to the adjoining residential areas are narrow, it is considered that they will nonetheless provide a useful link for pedestrians. The pedestrian access to Windmill Lane can be achieved at an appropriate width, offering an alternative route.

Issue – Previous Planning History

- The site has been refused planning permission in the past.
- Previous refusal was due to impact on character and route of footpath.
- Refusal in 1980 was due to the impact on the SLA, proximity to an existing sewage works, impact on existing facilities, conflict with the development plan and prematurity.

Council response

With regard to comments raised concerning the planning history of the site, it is acknowledged that there has been a historic refusal of permission on the site dating from 1979/1980. As this refusal was nearly 50 years ago the policy context that would have applied at the time of that application would be significantly different to the current policy context. A key policy change to note is that the site is currently allocated for housing in the adopted development plan and therefore the principle of development on this site has been established and is not considered to be in conflict with the development plan.

Issue - Visual and landscape impact

- Negative Visual Impact
- The site is within a Special Landscape Area.
- Impact on the Thaw Valley.
- Loss of a greenfield site.
- Site should be a green wedge.

Council response

The Council acknowledges the strength of feeling expressed by respondents in respect of the visual impact of the development and the view that this site forms part of a Special Landscape Area. For clarity, the boundary of the Upper and Lower Thaw Valley Special Landscape Area (SLA) in the RLDP is largely unchanged from the boundary identified in the adopted LDP, with the site lying outside of the SLA boundary. This allocation of the site for housing and the associated removal of the site from the SLA was scrutinised through the adopted LDP examination process and was found to be sound.

The Council acknowledges that the site is adjacent to the SLA boundary, and as such, design quality will be carefully monitored at the planning application stage to ensure that the visual amenity and character of the surrounding area are appropriately protected. In this regard, it should also be noted that as set out within Policy DNP1 of the Deposit RLDP, Special Landscape Areas are not designated with the intention of preventing development, but rather to ensure that any development within or adjacent to these areas is acceptable in character and that the key qualities and special characteristics of the SLA are conserved and enhanced.

Furthermore, as set out in Planning Policy Wales Edition 12 at paragraph 6.3.12, it is for Local Planning Authorities to determine the designation and boundaries of SLAs, based on LANDMAP data and other appropriate methodologies. PPW12 also confirms that SLA designations are non-statutory in nature, meaning that the Council retains the ability to review and amend SLA boundaries where there is clear and justified reasoning for doing so. The Council is satisfied that the position of the site relative to the SLA boundary has been appropriately considered through the preparation of the Deposit RLDP and that the matter of visual impact is also being addressed through the design and assessment process as part of the current planning application.

Issue – Highways concerns

- The access is not suitable for pedestrians or vehicles.
- St Athan Road is narrow with restricted visibility.
- No footway or cycle lanes on St Athan Road.
- There have been accidents over the years.
- Additional traffic will affect the local highway network.
- The site is too steep – 12 degree slope – exceeds WG guidelines.
- Existing traffic congestion at Broadway and Cardiff Road junctions.
- Road network unsuitable for construction traffic.
- Cowbridge has a higher proportion of older people who cannot walk to facilities and higher than average car ownership.

Council response

The Council notes the concerns raised by respondents regarding access to the proposed development and associated highway safety matters. As previously stated, there is a current planning application on the site and the Council's Highways Department is working closely with both the Planning Department and the site developer to reach a position that satisfies the required highways standards in respect of both access arrangements and safety.

Access to the development is proposed via a single point of access off St Athan Road. The Council notes that several representations have referenced the possibility of a secondary access via Windmill Lane; however, it is confirmed that no such access is proposed or intended as part of this development.

A Transport Assessment was prepared to support the planning application. This has been reviewed by the Council's highway authority. Whilst matters of detailed design are ongoing matters for discussion between the applicant and the highways authority, highways have not raised concerns about the suitability of St Athan Road to accommodate additional traffic, or in respect of congestion on the local highway network, including the Broadway and Cardiff Road junctions.

The Council also notes comments raised in respect of the gradient of the site and whether this is contrary to national policy guidance in relation to appropriate highway design. The Council's Highways Department is actively working with the developer, in accordance with national policy requirements, to ensure that the internal road gradient of the proposed development meets the relevant national standards. This matter is currently being further considered as part of the ongoing planning application process, and the Council is satisfied that it will be appropriately resolved prior to any determination being made.

Issue – Lack of employment opportunities

- Few local employment opportunities.

Council response

Within the RLDP, the Council identifies Cowbridge as a Service Centre Settlement within the settlement hierarchy, reflecting its established range of services, facilities and employment

opportunities. In particular, Cowbridge High Street provides a range of employment opportunities for local residents. The RLDP also makes provision for additional employment growth in the surrounding area. Policy SP14: Employment Growth identifies allocations at Vale Business Park, Llandow (10.9 hectares), in addition to the existing employment provision at the site, and Land at Llandow Trading Estate, Llandow (1.85 hectares). Both allocations are located less than four miles from the proposed development and therefore represent accessible, local employment opportunities. Furthermore, Cowbridge benefits from established public transport connections, including bus services to Barry and Bridgend, both of which provide a wider range of employment opportunities for residents willing to commute beyond the immediate local area. Taken together, the range of existing and planned employment opportunities within Cowbridge and the surrounding area, alongside the available public transport connections to larger employment centres, demonstrates that the development would have reasonable access to employment opportunities.

Issue - Public Transport and Active Travel

- The site is a long distance from bus stops.
- There are only 2 buses an hour.
- Cowbridge does not have a station.
- Bus takes too long and is unreliable.

Council response

Whilst concerns raised in respect of active travel provision and public transport accessibility are acknowledged, the Council is satisfied that the site is located in a position where a range of sustainable travel options are available to future residents.

Utilising the existing right of way on Windmill Lane, the site is 10 minutes walk from a primary school, less than 15 minutes from Cowbridge town centre, and within 20 minutes of a secondary school, leisure centre and health centre.

In respect of public transport, the Council notes the concerns raised regarding the adequacy of existing bus links serving the area. The nearest bus stop to the site is located on Primrose Hill, approximately 550 metres from the site, served by the X2 bus service, which provides connections to Cardiff to the east and Porthcawl to the west, operating every 30 minutes Monday to Saturday and hourly on Sundays. A further bus service, the 321, is accessible from Aberthin Road, approximately 800 metres from the site, providing connections to Llantrisant to the north and Llantwit Major to the south, operating on an hourly basis Monday to Saturday.

Additional bus stops serving both of these routes are also available along Cowbridge High Street to the north of the site, offering a range of travel options all within a walkable distance from the proposed allocation.

With regard to rail services, the Council acknowledges that direct rail access from the site is limited. The nearest station is Llantwit Major, situated approximately 7 kilometres from the site. Whilst this could be accessed by cycle, it is recognised that in most instances a motor vehicle would likely be required to reach the station. The station provides hourly services to

Bridgend, Barry, Cardiff, and Radyr. Whilst the Council acknowledges that rail accessibility from the site is constrained, the range of bus services available within walking distance provides a meaningful alternative for residents choosing to travel by sustainable modes.

It is considered that the location of the proposed allocation, combined with the active travel and public transport provision outlined above, accords with the intentions of Planning Policy Wales and the Active Travel (Wales) Act 2013, in that the site is situated in a location where residents are able to choose to travel by means other than the private car for a range of everyday journeys.

Issue – Loss of agricultural land

- The site is Best and Most Versatile Agricultural Land

Council response

The Council notes the concerns raised by respondents regarding the potential loss of Best and Most Versatile (BMV) agricultural land as a result of the proposed allocation. National planning guidance specifies that local authorities should seek, wherever possible, to avoid the development of Grades 1, 2, and 3a agricultural land, which are classified as the best and most versatile agricultural land. Accordingly, the consideration of BMV agricultural land has been a key consideration at all stages of plan preparation.

Whilst it is acknowledged that part of the site is Grade 3a land. It is important to note that the site is currently allocated within the adopted LDP, through which the loss of BMV agricultural land was considered as part of the LDP Examination process and was deemed acceptable by the appointed Inspector.

The RLDP is supported by a Background Paper on the Best and Most Versatile Agricultural Land (BP23A), where this site is considered. BP23A references the evidence available for the adopted LDP, which concluded that the mapped soil type is consistent throughout the site and based on previous experience of mapping this soil type, it was considered that there is a low probability of the site comprising BMV land, primarily due to soil limitations.

In line with the conclusions of the adopted LDP Inspector and the supporting background evidence, the Council is satisfied that the demonstrable need for housing within the Cowbridge area and across the Vale of Glamorgan during the plan period outweighs the impact associated with the potential loss of agricultural land.

Issue – Infrastructure Capacity

- Existing infrastructure cannot accommodate more dwellings
- Health service is already overstretched
- Lack of leisure facilities
- Insufficient capacity in schools

Council response

The Council notes the concerns raised by respondents regarding the impact of the proposed allocation on existing services and infrastructure within Cowbridge.

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes Cowbridge, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

CAVUHB were consulted on the current planning application and raised no objections.

In respect of educational provision, the Council has undertaken an assessment of the likely impact of the proposed allocation on school capacity within Cowbridge. At primary and nursery level, there is projected to be surplus capacity at Ysgol Iolo Morgannwg and the minimal demand projected for denominational education can be accommodated through admission arrangements, meaning that there is Welsh medium and denominational primary capacity to accommodate additional pupil numbers generated by the development. At English medium primary level, the site is within the catchment of Y Bont Faen Primary School which has insufficient capacity to accommodate the pupils projected from the development. It is noted that additional primary places have been provided in Cowbridge at

the 3-18 Cowbridge School. However, Y Bont Faen is the catchment school and closest school to the development so Section 106 contributions may be required.

In terms of secondary education, the Council acknowledges that Cowbridge School has insufficient capacity to accommodate the pupils generated from the development. There may also be a requirement for Additional Learning Needs provision. The Council will therefore seek appropriate Section 106 contributions from the developer towards the provision of additional secondary school capacity to mitigate the impact of the proposed allocation on secondary education provision in the area. There is projected to be sufficient Welsh Medium Secondary places.

The Council is satisfied that through the use of planning obligations secured at the planning application stage, the infrastructure impacts of the proposed allocation can be appropriately mitigated, and that the development can be delivered in a manner that is consistent with the objectives of the Deposit RLDP.

Issue – Conformity with Cowbridge Placemaking Plan and Town Council views

- Cowbridge Town Council is against the proposal – this should be given considerable weight.
- The Placemaking Plan states that the SLA should be protected.
- Cowbridge Placemaking Plan places a high store on local identity, sustainable growth and protecting and enhancing the character of the town, public spaces and edge of town environment.

Council response

It is noted that some respondents consider that the RLDP allocation does not conform with the Cowbridge Placemaking Plan. The Council does not agree with this assertion as the adopted LDP and the emerging RLDP are both referenced in the policy context of the plan, and the housing site at St Athan Road, as an LDP allocation, is specifically referenced in the plan as a pipeline project. The Placemaking Plan does not explicitly state that the SLA should be protected but does recognise the green assets in the town which offer opportunities for enhanced recreation and well-being.

Cowbridge with Llanblethian Town Council is a statutory consultee to RLDP process and has been formally consulted at all relevant stages of plan preparation. This reflects the ongoing and meaningful engagement the Council maintains with town and community councils throughout the RLDP process. All representations submitted by the Town Council have been carefully considered and responded to through the composite response process, in the same manner as all other representations received during the consultation period.

Issue - Flood risk

- Topography could exacerbate flooding in fields adjacent to River Thaw.
- Increased run off will impact houses on lower level of development.
- Proximity to sewage works – source of rats.

- Site is in the flood plain.

Council response

The Council notes the concerns raised by respondents regarding flood risk at the proposed allocation site, particularly in relation to the topography of the surrounding area and its potential to direct surface water flows towards the development.

In addition, the Council is aware of the proximity of the sewer on Windmill Lane to the site, as well as concerns regarding its capacity. As detailed in the statutory consultee section, DCWW has been consulted on the site both as part of the planning application process and the consultation process for the RLDP. In both sets of comments, DCWW have not raised objections

The Flood Map for Planning published by Natural Resources Wales (NRW), indicates that the site is generally at low risk of river and sea flooding. However, a small area of surface water flooding (Zones 2 and 3) is identified as crossing the site. The acceptability of development in this area will need to be considered as part of the determination of the current planning application. It is noted that the current planning application is supported by a Drainage Strategy and Flood Risk Assessment.

All new development in Wales must comply with national planning policy and statutory Sustainable Drainage Systems (SuDS) requirements. Mitigation measures typically include attenuation basins, swales, permeable surfacing, and other forms of green infrastructure designed to control both the rate and volume of runoff. These measures must be approved by the Council in its role as the SuDS Approval Body (SAB). The SAB process ensures that surface water runoff from new development does not exceed greenfield runoff rates, is managed as close to source as practicable and does not increase flood risk on-site or elsewhere. These measures are secured through the SAB approval process and planning conditions and are subject to detailed technical scrutiny.

The location of a sewage works on land approximately 100m south of the site boundary is acknowledged. The Council's Shared Regulatory Service pollution team have been consulted on the application and have not made adverse comments on this.

Issue – Public Open Space

- Field is currently used for walking, dog walking, blackberry picking and enjoying nature.
- There is a covenant preventing ball games on the area at Bessent Close, which will make up some of the open space – will this continue?

Council Response

The proposed development is on land that is currently privately owned, not public open space. It is noted that the field is currently used for recreational activities however, these are at the owner's discretion. It is recognised that there is a public right of way crossing the site. However, this will be maintained in the development process.

Appropriate provision of open space is proposed as part of the scheme. The planning application details that this will include the on-site provision of a children's playground, together with the incorporation of the adjacent area of open space off Llanquian Close, ensuring that meaningful and accessible open space provision is retained for the benefit of both new and existing residents.

The existing covenant relating to the use of the area at Bessent Close is a private legal matter and is separate from the planning process. The existence or continuation of any covenant restricting ball games on the street will not be affected by the development taking place on St Athan Road. The planning application will consider the proposed provision and use of open space as part of the assessment of the development, including whether the proposed open space is suitably located, accessible and appropriate to meet the needs of future residents, and consider the effects of adjoining residents to the new development.

Issue - Density of the development

- Density is too high – may impact on potable water supply.

Council response

The Council notes the concerns raised by respondents regarding the density of the proposed development at St Athan Road.

Through the Deposit RLDP, the Council has established a minimum net density requirement of 35 dwellings per hectare for housing developments of 0.5 hectares or above within Key Settlements, Service Centres, and Primary Settlements, as set out within Policy PGD2 of the Deposit RLDP. The supporting evidence and justification for this approach is further detailed within Background Paper BP48. This approach is consistent with the guidance set out in Planning Policy Wales Edition 12 (PPW12), which states that higher densities should be encouraged in urban centres and in locations in close proximity to major public transport nodes or interchanges. Cowbridge is identified as a Key Settlement within the RLDP settlement hierarchy, and the St Athan Road site benefits from a direct relationship with the urban centre of Cowbridge, where a range of services, facilities, and public transport options are accessible to future residents.

The indicative masterplan prepared for the site currently achieves a net density of 34.3 dwellings per hectare, which is marginally below the minimum policy requirement established under Policy PGD2. However, it is noted that the planning application is being considered under the adopted LDP, which has a density requirement of 30 dwellings per hectare. The Council considers this to be an acceptable position at this stage of the plan preparation process, reflecting the need to have regard to the character and nature of the existing built environment in close proximity to the site. The modest variation from the policy requirement demonstrates that the density of development has been carefully considered in the context of the surrounding area, rather than being applied rigidly without regard to local character. The Council is therefore satisfied that the density of the proposed development is appropriate, broadly compliant with the requirements of Policy PGD2 of the Deposit RLDP, and reflective of the character of the local built environment. Full details of

the density policy approach and its application are set out within Policy PGD2 and Background Paper BP48.

Issue - Biodiversity

- Trees and hedgerows should be retained.
- Impact on birds of prey and other wildlife.
- Dark Skies should be protected.

Council response

The Council notes the concerns raised by respondents regarding the ecological value of the site and the potential impact of the proposed development upon it. The site promotion is supported by an Ecological Assessment and this has also been submitted as part of the planning application.

In respect of hedgerow loss, appropriate replanting provision will be required as part of the planning application process. In accordance with national and local planning policy, any trees lost will need to be replanted at a ratio of 3:1.

With regard to comments raised concerning birds of prey within the site, it is noted that the developer intends to update the existing bird survey to ensure that the most current ecological information is available to inform the planning application. Any impact upon bird species potentially affected by the development can, and will, be required to be mitigated through measures including hedgerow replacement and tree planting. Further detail on these mitigation measures will become clear as the planning application progresses.

Some respondents have also raised concerns regarding Cowbridge's clear skies and the quality of its existing dark skies, and how this may be affected by the proposed development. Within the RLDP, Policy DNP7 focuses on maintaining the Vale's dark skies and directly addresses this concern, making clear that any external lighting associated with new development will only be permitted where it is demonstrated to be necessary and proportionate, designed to prevent light pollution, and limited to warm light below 2,700 Kelvins. The policy further requires that lighting has no adverse impact on biodiversity, landscape character, or residential amenity, and that cumulative impacts with other developments are avoided. The supporting text to Policy DNP7 acknowledges that the Vale of Glamorgan does not host a designated dark sky reserve but confirms that the Council remains committed to minimising light pollution and protecting the quality of the night sky across the county, particularly within the countryside. Where major developments propose extensive external lighting, a lighting plan prepared in accordance with the Welsh Government's Good Practice Guidance: Planning for the Conservation and Enhancement of Dark Skies in Wales (2025) may be required. It is therefore considered that the concerns of respondents regarding the potential impact of the development on Cowbridge's dark skies and night-time environment are adequately addressed and safeguarded through the application of Policy DNP7, which provides a robust framework to ensure that any lighting associated with the proposed development is sensitively designed, energy efficient, and kept to the minimum necessary.

Issue – Impact on Historic Environment

- Site may be important archeologically.

Council response

The Council understands concern about the potential of the site to be archeologically significant. HENEB, The Trust for Welsh Archaeology, have been consulted through the planning application process. HENEB has confirmed that is their evidence of potential for archeologically sensitive land to be disturbed on the site, however mitigation will be taken with the support of HENEB to make sure that this is managed appropriately through the development process.

Issue – Climate Change

- Development will increase C02 generation and NOx concentrations.
- Topography means excavation will be necessary, which will have a higher carbon footprint.

Council response

The concerns about the carbon footprint of new development are noted. The RLDP includes a policy on net zero buildings (Policy CC1) to seek to reduce the carbon emissions of new developments.

Issue – Other Matters

- The plan must include sufficient waste bins, including for dog waste.
- Concerns about site viability.
- Site has been used to land an emergency helicopter as severe lack of alternatives available.

Council response

The provision of sufficient waste and dog waste bins will be considered as part of the detailed design of the development. Appropriate bin provision will be expected within areas of public open space and along pedestrian routes to ensure that residents have convenient access to waste disposal facilities and to help maintain the appearance and cleanliness of the site. The precise number and location of bins will be determined at the detailed planning stage, taking into account the scale and layout of the development and the requirements of the Council's waste services.

In regard to the site's viability, significant work has been undertaken through the RLDP to ensure sites are viable and delivery rates will remain high within the Vale of Glamorgan. Candidate sites were required to submit viability information as part of the candidate site submission, which has been reviewed and formed a key part of the Candidate site assessment methodology which can be found in BP16. Further detail on site viability has

been submitted for this site as part of the 2022/00958/FUL planning application, which will be reviewed by officers as part of the planning application process.

The emergency services and CAVUHB have been consulted as part of the RLDP process and have not raised objections to the proposal. The site is not a designated landing site for helicopters, although it is appreciated that it could be used in an emergency situation.

Council Overall Response

Following detailed review of the representations submitted in relation to Site HG1.6, the Council acknowledges the breadth of issues raised, including the need for housing, the assessment methodology, previous planning history, visual and landscape impact, transport concerns, impact on biodiversity and infrastructure capacity.

The site is already allocated for housing in the adopted LDP, where the principle of development has been established. It is also subject to a full planning application and many of the matters raised relate to detailed matters that will be considered through the planning application process.

HG1.7 FORMER STADIUM SITE, ADJACENT TO BURLEY PLACE, ST ATHAN

Representation ID	Respondent Name	Representation Type
6706	Ministry of Defence (Mr Chris Waldron, DIO Assistant Safeguarding Manager) [690]	Comment
6928	Barratt Redrow Homes [2669]	Comment
6984	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7043	Marion morgan [2413]	Object
7144	Peter Stone Properties Ltd [1182]	Object
7164	Wig Fach Property Company Ltd [2373]	Object
7208	Mr Clifton Russell [3064]	Object

7 Representations were submitted by 7 individual representors in respect of HG1.7 Former Stadium Site, adjacent to Burley Place, St Athan. This included 3 comments and 4 objections.

The site is allocated for housing in the adopted LDP and was subject to a planning application for 80 dwellings. Following consideration by planning committee in July 2026, there is now a resolution to grant planning permission subject to the signing of a Section 106 agreement.

Individual statutory consultee responses from DCWW and the Ministry of Defence have been addressed first.

As more than one representor has raised the same issue, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

The key concerns raised were infrastructure capacity, highways issues, sustainable transport, the proximity to MOD St Athan and timescales for delivery.

STATUTORY CONSULTEE RESPONSES

Individual statutory consultee responses from DCWW and the Ministry of Defence have been addressed first.

6984 – Dwr Cymru Welsh Water

Water Supply - Dwr Cymru Welsh Water has made representations on planning application ref 2024/01152/FUL. A hydraulic modelling assessment (HMA) will be required.

Wastewater - Dwr Cymru Welsh Water has made representations on planning application ref 2024/01152/FUL. A hydraulic modelling assessment (HMA) will be required.

Wastewater Treatment Works - Dwr Cymru Welsh Water has made representations on planning application ref 2024/01152/FUL. Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030, and capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of a scheme at the WwTW.

Council response

The comments from Dwr Cymru Welsh Water (DCWW) on the need for hydraulic modelling are noted. DCWW have previously made comments on planning application 2024/01152/FUL requesting the following condition:

No development shall take place until a foul water drainage scheme to satisfactorily accommodate the foul water discharge from the site has been submitted to and approved in writing by the local planning authority. The scheme shall be informed by a Development Enabling Assessment and shall identify:

A) A point of connection on the public sewerage system, and

B) Where necessary, removal of surface water to offset the introduction of the new foul water generated by the development, and

C) Where necessary, the extent of reinforcement works required to accommodate the development.

No building or dwelling shall be occupied until the approved scheme has been completed in accordance with the approved scheme.

DCWW did not identify a need for hydraulic modelling in respect of water supply as part of the planning application.

To address sewage capacity issues, DCWW have confirmed that a scheme to accommodate growth is planned for delivery at West Aberthaw Wastewater Treatment Works (WwTW) in the current AMP8 investment period (2025-2030). Currently the scheme is planned for completion in the 2025 to 2030 period.

6706 - Ministry of Defence

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Policy HG1(7) - MOD St Athan (technical safeguarding zone)

Development triggering statutory safeguarding criteria:

• Any development or change of use will trigger statutory consultation requirement

• Development of, or exceeding, 10.7m in height above ground level will trigger statutory consultation requirement

Suggested Change

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Council response

The response received from the Defence Infrastructure Organisations (DIO) Safeguarding Team on behalf of the Ministry of Defence (MOD does not raise an objection to the principle of development in respect of its impact on the MOD St Athan technical safeguarding zone, but they have advised that any development or change of use of the land will trigger a statutory consultation requirement. They recommend that wording should be included to state that the development should be designed to ensure that it would have no impact on the operation or capability of the defence site or asset. The inclusion of this statement will provide clarity on consultation requirements for the application process, so it is proposed that the following text be included as a key site issue/constraint at Appendix 2 – Infrastructure Delivery Plan "Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site to ensure that there is no impact on the operation or capability of the defence site or asset."

The MOD Safeguarding Team have been consulted on planning application 2024/01152/FUL and made the following comments "I can confirm that, following review of the application documents, the proposed development would be considered to have no detrimental impact on the operation or capability of a defence site or asset. The MOD has no objection to the development proposed."

They have advised that in the event that any revised plans, amended plans, additional information or further application(s) are submitted for approval, the MOD, as a statutory consultee, should be consulted and provided with adequate time to carry out assessments and provide a formal response whether the proposed amendments are considered material or not by the determining authority. The inclusion of the above statement in Appendix 2 of the RLDP reflects this requirement and will ensure the necessary consultation is undertaken should there be any future changes to the layout, or further planning applications.

Proposed change

Include the following text as a key site issue/constraint at Appendix 2 – Infrastructure Delivery Plan "Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site to ensure that there is no impact on the operation or capability of the defence site or asset."

COMPOSITE RESPONSE

COMMENTS AND OBJECTIONS

Issue - Infrastructure capacity

- Insufficient capacity in schools.
- GP services at capacity.

Council response

In respect of educational provision, the Council has undertaken an assessment of educational need generated by the site in respect of forecast future school places for nursery, primary and secondary education (BP43 Education). This indicates that, based on pupil forecasts, the site would generate the need for 18 secondary and 19 primary school places.

It should be noted that as part of a Welsh Government land disposal, the site is required to deliver 50% affordable housing, which is higher than the policy requirement in this area of 35%. As part of the planning application process, a viability assessment has been submitted which demonstrates that it would not be viable for the site to provide a full Section 106 package alongside an increased level of affordable housing and therefore it has not been possible to secure a financial contribution towards additional school places in this instance.

Notwithstanding this, the pupil numbers generated from the site have been factored into the forecasts to ensure sufficient provision is made. To meet growing demand for school places in St Athan, St Athan Primary School is allocated for redevelopment and expansion on the site of the existing school.

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to

existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes St Athan, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

Issue – Poor Active Travel and Public Transport

- The buses are infrequent.
- There is currently no train station in St Athan.
- New development in St Athan is predicated on a train station being provided, but there is uncertainty on its delivery.

Council response

St Athan is served by bus service 304 linking the site to both Llantwit Major in one direction and St Athan centre, Barry and Cardiff in the other direction. The service runs approximately once an hour.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level

crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

The introduction of additional rail services at Llantwit Major and Rhoose will improve integration with the bus service.

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

A Preliminary Feasibility Study was undertaken in 2022 to assess the potential for a new railway station on the Vale of Glamorgan Line at St Athan. This study examined a range of potential locations and considered the opportunities and constraints associated with each site.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

Neither the employment nor housing allocations are considered to be reliant and dependent on the delivery of the station. St Athan is identified as a primary settlement within the Strategic Growth Area, reflecting the range of services and facilities available. Furthermore, the co-location of housing with the employment sites at Bro Tathan and Aberthaw means that the settlement is sustainable in its own right. This aligns with the key objective of the plan to locate new housing, employment, services and facilities in close proximity, thereby reducing the need to travel.

Notwithstanding this, delivery of the station would enhance opportunities for sustainable travel, and its delivery at the earliest opportunity would be supported.

Issue - Traffic, Parking and Highway Safety

- Increase in traffic congestion.

Council response

The Highways Authority were a consultee on application 2024/01152/FUL and raised no objection in respect of the impact of the development on the wider highway network. Detailed highways comments were made in respect of the site layout which have been addressed as part of the consideration of the planning application.

Issue – Timescales for Delivery

- The housing trajectory (Appendix 1 of the RLDP) identifies that development will commence in 2027/28 but this is considered optimistic given that highways and ecology objections remain for planning application 2024/01152/FUL.

Council response

The housing trajectory dates have been determined through consultation with the site promoters/developers and reflected the position at the time of the publication of the Deposit Plan. The planning application has subsequently been reported to planning committee where it was approved subject to the signing of a Section 106 agreement.

The representation goes on to argue that as there is uncertainty on the delivery of this site in the earlier years of the plan period, additional sites with stronger prospects of short-term delivery should be allocated. However, it remains the Council's position that the site is deliverable in the short to medium term, particularly given its recent planning approval (subject to Section 106). The other site being suggested by the site promoter as an alternative is larger in size and not as far progressed in the planning process so is not realistically likely to be brought forward at an earlier opportunity.

Council overall response

The concerns raised as part of the consultation are acknowledged. This is a site allocated in the adopted LDP for housing which has been rolled forward into the RLDP. A planning application has been received and subsequently approved (subject to the signing of a Section 106 agreement) for 80 units on the site with full consideration given to the concerns raised as part of the planning application process.

Whilst no objections were raised to the planning application by the MOD Safeguarding Team, their comments regarding the need to reference the MOD St Athan technical safeguarding zone are noted and will be incorporated within Appendix 2 to ensure that this constraint is identified should there be any subsequent planning applications in the future.

HG1.8 LAND AT CLIVE ROAD, ST ATHAN

Representation ID	Respondent Name	Representation Type
4413	Miss Hayley Evans [2759]	Object
4481	Mrs Emma Sprudd [2724]	Object
4482	Miss R Coles [1593]	Object
4483	Mrs Heather McKay [2810]	Object
4484	Mrs Helen Bullen [2811]	Object
4485	Mr Martin Bullen [2812]	Object
4486	Mr Lewis Tiley [2813]	Object
4487	Mr Gareth Morgan [1798]	Object
4488	Mrs Pauline Harris [2815]	Object
4490	Mr Benjamin Sprudd [2817]	Object
4491	Mr Christopher Goacher [2818]	Support
4492	Ms Abbie Sell [2819]	Object
4605	Mr Jeremy Wyatt [2866]	Object
5014	Ms Elaine Taylor [3077]	Object
5075	Emma Walsh [3116]	Object
5091	Catherine Levett [3124]	Object
5116	People's Forum Wales (Susan Jones) [3134]	Object
5129	Mr Joel Horn [3137]	Object
5131	Steve Hinton [3136]	Object
5146	Mrs Anita Mckinstry [1794]	Object
5184	Emma Chandler [3153]	Support
5223	John Davies [3175]	Object
5270	Mr Paul Noyes [2229]	Object
5283	St Athan Community Council (Mr Roger Eustace, Chairman) [2154]	Object
5511	Mrs Sally French [3281]	Object
5646	Ms Ann Barnaby [1702]	Object
5689	Julie M Frederick [3332]	Object
5733	Mr David Bairsto [3344]	Object
5898	St Athan Community Council (Maria Stevens, Proper Officer (Clerk)) [2679]	Object
5983	L O'Keeffe [1792]	Object
6173	Mrs Sandra Toker [1575]	Object
6225	Mrs Claire Loxton [3004]	Object
6284	Richard Marsh [3521]	Object
6443	Mr Neil Jenkins [2729]	Object
6475	Mrs Melissa Plimmer [3599]	Object
6478	St Athan Community Council (Cllr Sandra Toker) [3601]	Object
6585	Councillor Stephen Haines [1029]	Object
6630	Ms Maxine Levett [698]	Object
6636	Mr Andrew Street [3444]	Object
6707	Ministry of Defence (Mr Chris Waldron, DIO Assistant Safeguarding Manager) [690]	Comment
6929	Barratt Redrow Homes [2669]	Comment

6986	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7044	Marion morgan [2413]	Object
7145	Peter Stone Properties Ltd [1182]	Object
7165	Wig Fach Property Company Ltd [2373]	Object
7209	Mr Clifton Russell [3064]	Object

A total of 46 Representations were submitted by 46 individual representors in respect of HG1.8 Land at Clive Road, St Athan. This included 2 representations of support for the allocation of the site, 3 comments and 41 objections.

The key issues were in relation to the sustainability of the location, the level of development within St Athan, the loss of open space, land ownership, infrastructure capacity, sewerage and drainage, sustainable transport and highways issues. Concerns were also raised about the proximity of the site to MOD St Athan and aerospace safeguarding and impacts on the historic environment, biodiversity, landscape, and community safety. Representations also considered that the proposed site was contrary to other policies and that the site should be used for alternative uses instead. Other matters were also raised including loss of views, impacts on property values and disruption during the construction phase.

Individual statutory consultee responses from DCWW and the Ministry of Defence have been addressed first.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

STATUTORY CONSULTEE RESPONSES

6986 – Dwr Cymru Welsh Water

Water Supply - A hydraulic modelling assessment (HMA) will be required.

Wastewater - A hydraulic modelling assessment (HMA) will be required. 100mm, 150mm and 225mm diameter foul sewers cross the site.

Wastewater Treatment Works - Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030, and capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of a scheme at the WwTW.

Council response

The comments from Dwr Cymru Welsh Water (DCWW) on the need for hydraulic modelling are noted. DCWW had previously made these comments and Appendix 2 Infrastructure Plan reflects this requirement.

6707 - Ministry of Defence

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Policy HG1(8) - MOD St Athan (technical safeguarding zone)

Development triggering statutory safeguarding criteria:

• Any development or change of use will trigger statutory consultation requirement

Suggested change

MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets.

Council response

The response received from the Defence Infrastructure Organisations (DIO) Safeguarding Team on behalf of the Ministry of Defence (MOD) does not raise an objection to the principle of development in respect of its impact on the MOD St Athan technical safeguarding zone, but they have advised that any development or change of use of the land will trigger a statutory consultation requirement. They recommend that wording should be included to state that the development should be designed to ensure that it would have no impact on the operation or capability of the defence site or asset. The inclusion of this statement will provide clarity on consultation requirements for the application process.

Proposed change

Include the following text as a key site issue/constraint at Appendix 2 – Infrastructure Delivery Plan "Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site to ensure that there is no impact on the operation or capability of the defence site or asset."

COMPOSITE RESPONSE

<u>SUPPORT</u>

- It would deliver much needed housing.
- Not considered to be a 'much used green space' - grassed area not used for children to play as rarely mown. Only used by dog walkers.
- Development would remove a health and safety risk and unpleasant smells due to off lead dogs and dog fouling.

Council response

Support is noted and the comments about the current use of the site are acknowledged.

COMMENTS AND OBJECTIONS

Issue - Sustainability of Location

- Lack of nearby employment opportunities.
- No shops or services in the East Camp/Flemingston area of St Athan.

Council response

The site is considered to be well served by current and future employment opportunities, as it is directly adjacent to Bro Tathan Enterprise Zone, which is identified as a major employment allocation under Policy SP14.1 of the Deposit Plan. The whole site is 338 Ha and it is anticipated that 66.7 Ha of employment land will be delivered on the site in the plan period, creating a significant number of new jobs. This includes several areas that either have planning permission or are subject to a planning application. In addition, a number of businesses are already operating on the site, providing existing employment opportunities.

It is recognised that the East Camp estate does not currently have a shop. However, the site is located in close proximity to a community centre and community café. There may be scope for further retail activity but that would need to be subject to an appropriate planning application, where retail impacts are quantified, in the context of retail policies.

There is an adjacent active travel route providing safe pedestrian and cycle links to the centre of St Athan, which is approximately 1km away, where there are a range of services and facilities including retail, a library, GP surgeries, pharmacy and post office. Land is also allocated for a foodstore in St Athan under Policy SP12. The site is also within 150m of a bus stop, with service 304 linking the site to Llantwit Major, Barry and Cardiff.

Issue – Over-development of St Athan

- The village is already absorbing large developments.
- Loss of village character.
- New houses are not needed.
- No need for the volume of social housing.

Council response

St Athan is identified as a primary settlement within the Strategic Growth Area and should therefore be a focus for new development. The settlement is adjacent to the largest employment allocation in the RLDP at Bro Tathan Enterprise Zone, and is in close proximity to the Employment Regeneration Opportunity Area at the former Aberthaw Power Station. A level of housing commensurate with the area's role as a focus for employment growth is therefore considered appropriate in order to deliver the key component of the strategy to align locations for new housing, employment, services and facilities to reduce the need to travel. The provision of new large housing developments in St Athan will also facilitate the delivery of additional facilities including retail and community facilities.

It is recognised that maintaining the distinctive character and appearance of settlements is an important planning objective. However, it is not considered that the development, in principle, would result in unacceptable harm to the character of St Athan as this site is adjacent to an existing housing estate and would represent an appropriate rounding off. Any future development would be required to respond sensitively to local character through appropriate scale, massing, and height and use of appropriate materials.

New housing is required to meet forecast increases in the population and in household formation. In relation to housing needs, as of February 2026, it was identified that there were some 7,700 persons/households registered on the Council's Housing waiting list across the Vale (over 3,200 in the highest priority need). There are over 200 persons/households on the housing waiting list in the ward of St Athan, together with high numbers for the adjoining wards of Llantwit Major and Cowbridge. Furthermore, the Council's latest LHMA indicates that there is a need for 128 new affordable dwellings in the ward, after existing committed sites have been discounted. There is therefore demonstrable need for additional affordable housing in the St Athan area, as well as in the wider Western Vale.

Issue - Loss of open space

- The site functions as a village green.
- It is one of the last remaining accessible green spaces in East Camp.
- Used daily for dog walking, children's play, informal recreation and socialising.
- Important for mental health, wellbeing and exercise.
- Lone women feel safe using the field.
- Elderly and disabled residents rely on it for short, accessible walks.
- No equivalent alternative green space within walking distance.
- Once lost green space cannot be replaced.
- Field adjacent to the Gathering Place has already been lost to development.
- The presence of the golf club does not lessen or replace the need for community open space.
- Paul Lewis playing fields are a 19 minute walk from Clive Road and are unsuitable for dog walking.
- If it is lost, it should be replaced with an equivalent or superior replacement open space.
- Loss of greenfield land.

Council response

It is acknowledged that the site is currently used on an informal basis by many residents. However, the site is privately owned and, whilst the landowner has historically allowed the public to use the land for informal recreation, it is not formally designated as an open space, a village green, or protected recreational land within the development plan.

A Multi Use Games Area (MUGA) - an area of fenced hardstanding - is located within the site boundary. The indicative layout for the site identifies the retention of an area that can be used for recreation purposes. This may involve an upgrade to the existing facility or the provision of an alternative facility on-site.

Background Paper 31 - Open Space Assessment (BP31) has undertaken a review of the amount of open space in each ward of the Vale in line with the typologies of open space set out in Technical Advice Note 16 – Sport, Recreation and Open Space (TAN 16). Due to its inclusion in the Deposit RLDP as a housing allocation, the assessment excludes Clive Road field, although the MUGA on site is included in the calculations as it is due to be retained.

The open space assessment is undertaken on a ward basis, which is considered to be an appropriate geographical basis to assess provision and is consistent with the assessment that informed the adopted LDP. BP31 indicates that there is an existing under-provision of children's play space in the ward when compared to the Fields in Trust standards. The retention of the MUGA, which falls under the children and young people typology, will ensure that this development will not exacerbate existing shortfalls.

Calculations for outdoor sports facilities have been undertaken including and excluding golf courses. In the calculation where golf courses are excluded, there is an under-provision of outdoor sports facilities in the ward. However, it should be noted that additional outdoor sports facilities are proposed at both the key site allocations at Church Farm (Phase 2) and Land West of St Athan, with the latter extending the existing sporting facilities at Paul Lewis playing fields.

In terms of TAN 16 typologies, Clive Road (excluding the MUGA) is considered to be an area of amenity greenspace. The calculations indicate that there is an over-provision of amenity greenspace in the ward, even when the Clive Road site is excluded. The design of the East Camp estate, an ex-MOD estate, includes multiple areas of amenity greenspace which range in size, but collectively make a significant contribution to the amenity greenspace total. TAN 16 states in relation to the loss of playing fields and green spaces that "*only where it can be clearly shown that there is no deficiency, should the possibility of their use for alternative development be considered*."

Some respondents have stated that there is no other alternative green space in walking distance. However, the mapping shows there is a similar sized large flat area of open space at Burley Place/Ringwood Crescent. This is in close proximity to the site, and easily accessible for the residents on the East Camp Estate.

It is accepted that the site is 'greenfield,' but the RLDP strategy does allow for appropriate greenfield releases.

With regards to the loss of a field adjacent to the Gathering Place, this area formed part of a housing allocation in the adopted LDP (MG2.5 Land to the east of Eglwys Brewis, St Athan)

where the principle of development had been established. Key areas of informal and formal open space have been provided as part of this housing development.

The area is also served by a network of public rights of way, which can be used for dog walking.

Issue - Land ownership

- Residents pay an estate management fee to manage the land, including land required for the access.

Council response

Whilst it may be the case that residents pay estate management fees to maintain open spaces and grass verges within the estate, it is understood that the landowner of Clive Road field also owns the grass verge between the fenced site boundary and the adopted highway and this forms part of the option agreement relating to the disposal of the site for development. Land ownership/maintenance costs are not considered to be fundamental to the acceptability of the site in principle for housing.

Issue - Infrastructure capacity

- Insufficient capacity in schools.
- No triggers set to ensure that existing facilities are in place before occupation of dwellings.
- GP and dental services difficult to access.

Council response

In respect of educational provision, the Council has undertaken an assessment of educational need generated by the site in respect of forecast future school places for nursery, primary and secondary education (BP43 Education). This indicates that, based on pupil forecasts, the site would generate the need for 9 secondary and 11 primary school places. At primary level, there is insufficient capacity at primary level and a contribution towards additional places would be required. To meet growing demand for school places in St Athan, St Athan Primary School as allocated for redevelopment and expansion on the site of the existing school. A contribution towards Additional Learning Needs education would also be required due to insufficient capacity. At secondary level, there is sufficient capacity at Welsh Medium and Denominational schools, but additional capacity may be required at the English Medium catchment school, Llantwit Major School, when all developments are considered simultaneously. If this forecast position remains the same at planning application stage, the Council will look to secure a financial contribution towards increased secondary school capacity.

Where planning obligations are required, a Section 106 agreement will be signed which sets out the timescales and trigger points for the provision of facilities and/or any financial payments towards infrastructure provision. The trigger points will be site specific and will be negotiated at planning application stage.

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes St Athan, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented from 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

Issue - Sewage and drainage

- Surface water flooding risk.
- No drainage strategy has been provided.

Council response

To address sewage capacity issues, DCWW have confirmed that a scheme to accommodate growth is planned for delivery at West Aberthaw Wastewater Treatment Works (WwTW) in the current AMP8 investment period (2025-2030). Currently the scheme is planned for completion in the 2025 to 2030 period.

The Council has prepared a Stage 1 Strategic Flood Consequences Assessment (SFCA), utilising a range of data sources. The Flood Map for Planning, which is referenced in the SFCA, indicates that the site is not currently identified as being within a flood risk area for river, sea, surface water or small watercourses flooding.

It should be noted that all new and significant developments will have to implement some kind of sustainable drainage system (SuDS) as part of its design and build. These SuDS must be designed and built in accordance with standards published by Welsh Government and approved by the local authority acting in its role as a SuDS approval body (SAB). The SAB will then have the duty to adopt any compliant systems, serving multiple properties. Detailed consideration of any impact on surface water flooding is normally undertaken at planning application stage, when the site layout, finished ground levels and drainage design are known. For that reason, the RLDP requires any future planning application for this site to be supported by a Flood Consequences Assessment and a detailed drainage strategy.

Issue – Poor Active Travel and Public Transport

- It is a car dependent location.
- The estate is separated from St Athan village by a steep hill.
- The buses are infrequent and unreliable.
- Bus times do not link with train times at Llantwit Major.
- There is currently no train station in St Athan
- New development in St Athan is predicated on a train station being provided, but there is uncertainty on its delivery.

Council response

As detailed above, the site is adjacent to active travel route providing safe pedestrian and cycle links to the centre of St Athan, where there are a range of services and facilities. It is acknowledged that the topography may be difficult for some residents. However, there are other sustainable transport options available, as the site is within 150m of bus stops, with

service 304 linking the site to both Llantwit Major in one direction and St Athan centre, Barry and Cardiff in the other direction.

It is recognised that this service only runs approximately once an hour and the concerns about timetabling with the hourly train service are noted. The Council will continue to liaise with transport providers on this matter and opportunities to maximise multi-model travel will be explored.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

The introduction of additional rail services at Llantwit Major and Rhoose will improve integration with the bus service.

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

A Preliminary Feasibility Study was undertaken in 2022 to assess the potential for a new railway station on the Vale of Glamorgan Line at St Athan. This study examined a range of potential locations and considered the opportunities and constraints associated with each site.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work and it is

considered that his demonstrates a positive direction of travel in terms of supplementing existing sustainable modes.

Neither the employment nor housing allocations are considered to be reliant and dependent on the delivery of the station. St Athan is identified as a primary settlement within the Strategic Growth Area, reflecting the range of services and facilities available. Furthermore, the co-location of housing with the employment sites at Bro Tathan and Aberthaw means that the settlement is sustainable in its own right. This aligns with the key objective of the plan to locate new housing, employment, services and facilities in close proximity, thereby reducing the need to travel.

Notwithstanding this, delivery of the station would enhance opportunities for sustainable travel, and its delivery at the earliest opportunity would be supported.

Issue - Traffic, Parking and Highway Safety

- Clive Road is narrow and constrained by parked cars.
- Lack of existing parking.
- Impact on emergency vehicle access.
- Increase in traffic congestion.
- Access into St Athan from the B4265 is dangerous.
- Speeding is a concern in the village.

Council response

The Highways Authority were consulted as part of the candidate site assessment process and raised no objection to the principle of housing development on the proposed site. The assessment concluded that access into the site was best suited off Clive Road through the provision of a simple 'T' junction. A transport statement would be a requirement at planning application stage to evaluate the effects the proposed site would have on the surrounding highway network and how they will be addressed by the developer/ applicant, including off site highway improvements and other sustainable modes of transport improvements such as walking, cycling and public transport.

At planning application stage, consideration will also be given to the proposed width of the highways to ensure that they meet required standards to ensure accessibility for emergency vehicles.

In order to ensure that the development does not exacerbate existing parking issues, there will be a requirement for sufficient parking to be provided on site as part of the development, in accordance with the maximum standards set out in the Council's Parking Standards Supplementary Planning Guidance. The exact requirements will be determined at planning application stage when the size and type of units will be known.

The Deposit RLDP includes a proposal for highways improvements at the junction of Gileston Road at the B4265 (Policy TR1.7 Gileston Road junction, St Athan). This will improve capacity and safety at this junction.

The concerns about speeding traffic in St Athan are noted. However, this is related to driver behaviour rather than being directly related to any development on this site and is more appropriately addressed through separate measures such as enforcement or traffic interventions.

Issue - Proximity to the MOD St Athan and aerodrome runway

- Concern from residents on the impact on MOD operations.
- Clarification required on Public Safety Zones.
- The site is near/under the flight path for the runway, raising concerns about aircraft noise and vibration and safety risks.
- Golf club previously not allowed to extend due to proximity to the runway.

Council response

The site is within an Aviation Safeguarding Zone, as identified on the RLDP Constraints Map. It lies within the aerodrome safeguarding zone for Cardiff Airport, where the safeguarding zone map relating to the site indicates that Cardiff Airport should be consulted on all developments where the structures exceed 45m. It is also within a safeguarding zone for St Athan aerodrome, which is in the ownership of Welsh Government and operated by Cardiff Airport.

The Civil Aviation Authority (CAA), Cardiff Airport, Welsh Government (as landowners) and the Ministry of Defence were all consulted on the Deposit RLDP. No comments were received from the CAA or Cardiff Airport as part of the Deposit RLDP consultation and no concerns were raised by Welsh Government as part of their representation on Bro Tathan.

A response was received from the Defence Infrastructure Organisation's (DIO) Safeguarding Team on behalf of the Ministry of Defence (MOD). They have not raised an objection to the principle of development in respect of its impact on the MOD St Athan technical safeguarding zone, but have advised that any development or change of use of the land will trigger a statutory consultation requirement. They recommend that wording should be included to state that the development should be designed to ensure that it would have no impact on the operation or capability of the defence site or asset. As discussed in respect of the statutory consultation response above, the Council agrees with the inclusion of the suggested wording within the Appendix.

Representors seek clarification on whether the site is located within a public safety zone (PSZ). The Department for Transport guidance on the requirements for airport PSZ indicates that PSZs are established at all airports that traffic more than 18,000 commercial air transport movements per year. St Athan aerodrome is not a commercial airport, and the

number of air movements is low (less than 200 flights in the 12 months prior to April 2026). The Department for Transport's guidance is therefore not relevant.

Policy DNP5 on Environmental Protection requires that development will not have an unacceptable impact on residential amenity as a result of noise, vibration, odour and light pollution and the concerns In accordance with Appendix 2 of the Deposit Plan, there will be a requirement as part of any future planning application for a noise assessment to be submitted. This will be assessed by the Council's Shared Regulatory Services department to establish any mitigation measures that may be required.

With regards to past restrictions on the extension of St Athan golf club due to the proximity to the Bro Tathan runway, it is advised that the last application for an extension to the club house (in 1992) was approved. There have been no subsequent planning applications for further extensions.

Issue – Historic Environment

- Site is archeologically sensitive – records of a Roman road crossing the site and human remains in the vicinity.

Council response

Heneb (previously Glamorgan Gwent Archaeological Trust) were consulted as part of the candidate site assessment process. Their comments on Clive Road stated "*The Historic Environment Record identifies evidence of significant late prehistoric and Roman activity, including a Roman road crossing the site; and human remains, in the immediate vicinity. Desk-based assessment and geophysical survey, prior to any determination of an application would inform mitigation, which may include further pre determination work*."

The potential for an Archaeological Desk Based Assessment is identified in Appendix 2 of the Deposit RLDP as likely evidence that may be required at planning application stage. It is also identified in the site-specific constraints for HG1.8. The appropriate time to undertake such surveys is at planning application stage and as the need for surveys is identified it is considered that this matter is appropriately addressed.

Issue - Biodiversity and Environmental Impact

- The site supports a number of species and its development would result in a loss of habitat and wildlife corridors.
- Species include Wasp Spider, Essex Skipper Butterflies and Roesel's Bush Crickets, which are rare in the area.
- Concerns about loss of hedgerows, besting birds, reptiles and mammals.
- Promise of prioritising nature given the nature emergency.

Council response

The candidate site submission was supported by an Ecological Impact Assessment. This indicated that the site consisted of poor semi-improved grassland, scrub, hedgerows, scattered trees and hardstanding. The proposals will result in the loss of hardstanding, and poor semi-improved grassland, which are considered to be of negligible and low ecological value.

An updated Ecological Assessment will be required to support any future planning application. In accordance with national planning policy and the requirements of Policy SP20 on Biodiversity and Ecosystem Resilience, it must be demonstrated that there is an overall net benefit for biodiversity proportionate to the nature and scale of the development. An indicative layout has been prepared which indicates that the majority of the hedgerow/tree belt and dense scrub which form the western and southern boundaries to the site will be retained as part of any development.

The presence of specific invertebrate species on the site is noted. These species are not afforded specific statutory protection. Their presence, in itself, does not preclude development, but will need to be considered as part of the overall mitigation and biodiversity enhancement.

Issue – Impact on Special Landscape Area

- Site is currently in the Upper and Lower Thaw SLA and its development will cause unacceptable harm to the landscape character.

Council response

The site's location within the Upper and Lower Thaw Special Landscape Area (SLA) in the adopted LDP is acknowledged. However, this is a local designation that may be reviewed as part of the RLDP process.

The candidate site submission is supported by a Landscape and Visual Technical Note (LVTN). This concludes that in relation to landscape character, the site appears well-related to the RAF St Athan base and associated settlement edge. Beyond the site's southern and eastern boundaries, the landscape exhibits a character most closely related to the lias plateau associated with the River Thaw. In relation to views/visual context, the site is visually contained by the surrounding built form, landform and vegetation. There are no published 'key' or 'important' views that the site is visible from/the site forms part of the view. The likely people who would be affected by the proposed development of the site is therefore limited to those in the immediate surroundings.

The LVTN notes that the Designation of SLAs Background Paper, prepared by TACP to support the designation of SLAs in the adopted LDP, shows the proposed extent of the SLA boundary. This excludes the land at Clive Road, with the boundary being drawn immediately south of the site. In the adopted LDP proposals map, the SLA boundary has been extended to the

settlement boundary, therefore including the Clive Road site and for the purposes of the adopted LDP it is the boundary on the proposals map that defines the extent of the SLA.

However, the LVTN states that the site is physically and visually separated from the landscape associated with the River Thaw and its original exclusion from the SLA is noted. The LVTN identifies the potential for mitigation along the western and southern boundary, through the retention of hedgerow and tree cover and encouragement of woodland management for continuous cover.

On this basis, it is considered that the removal of the site from the Upper and Lower Thaw SLA would be acceptable, as it would not result in fundamental harm to the character of the SLA as this is a self-contained site which was outside of the original SLA boundary. Instead, with appropriate design and mitigation secured through the planning process, the proposal has the potential to respect and enhance local landscape qualities while contributing to the Council's housing requirements.

Issue - Community Safety

- Potential for anti-social behaviour.
- Concerns about community cohesion with future occupants.
- Greater pressure of policing.

Council response

In respect of potential anti-social behaviour, on large developments the Council formally consult the South Wales Police Designing Out Crime Officer who provides advice in respect incorporating measures to ensure developments are safe and reduce opportunities for anti-social behaviour, whilst encouraging community cohesion.

Issue - Alternative uses

- The site should be designated as a community green space, play area, allotments/community garden, outdoor gym or biodiversity area.
- The site would be better suited to businesses, shops or a base for emergency services.

Council response

The Council acknowledges the suggestions that the site be considered for alternative uses either for the community, or for commercial uses or as a base for emergency services. However, it is important to note that the site is in private ownership and has been assessed through the plan-making process as suitable and appropriate for residential development. The allocation reflects a robust evidence base, including assessments of site deliverability, sustainability, and contribution toward meeting identified housing needs.

While community uses such as green spaces, play areas, and biodiversity features are valued, these are considered as part of the wider planning framework. The provision of open space and recreational facilities is addressed strategically across the area and will also be secured, where appropriate, through the development management process (e.g. through on-site provision or developer contributions). Therefore, the allocation of this site for housing does not preclude the incorporation of landscaping, amenity space, or biodiversity enhancements as part of a future scheme.

In respect of alternative uses such as retail, employment, or emergency services infrastructure, provision has already been made on other sites in St Athan for employment and retail. The emergency services are consultees in the RLDP process, and they have not identified a need for the provision of a base in the area.

Issue - Alternative Sites/Area

- Other sites should be used for housing, including Bro Tathan.
- Cowbridge has a smaller population that St Athan, but more facilities. It should therefore accommodate more housing.

Council response

Bro Tathan forms part of the Cardiff Airport and St Athan Enterprise Zone. The site is allocated for employment in the adopted LDP and continues to be identified as a major employment allocation in the Deposit RLDP. The landowner, Welsh Government, is actively promoting the site for employment use and it not therefore realistically available as a deliverable housing site.

Cowbridge also forms part of the Strategic Growth Area and provision has been made for several sites which will deliver significant numbers of new homes in the Cowbridge area. Developments are currently under construction at the Former Cowbridge Grammar School, the Former Cowbridge Police station and at Clare Gardens (Darren Farm) – a significant site being developed across several phases. In addition, another site is allocated at St Athan Road for over 100 dwellings.

Issue - Conflict with other policies

- It is contrary to the RLDP sustainable growth strategy.
- The site is delivery led rather than policy led.
- The proposal conflicts with Policy SP1 -Delivering the Strategy that focuses development in a Strategic Growth Area, as Clive Road is not a strategic site and it is not a sustainable location.
- The proposal conflicts with RLDP Policy SP10 on Sustainable Transport/ LDP Policy SP7 on Transportation, which requires development to minimise impact on the highway network and promote sustainable transport

- The proposal conflicts with Policy on Green Infrastructure, which aims to protect and enhance the Vale's green spaces
- The proposal conflicts with MD2 – Design of new development which requires development to respect local character, protect amenity, and provide appropriate access to services and facilities
- There is conflict with TAN 16 (Open Space).
- The site does not align with Future Wales, which states that growth shown be concentrated in areas with high accessibility and public transport.
- It does not conform with Planning Policy Wales, specifically around placemaking principles.
- Contrary to the Five Ways of Working in the Well-being of Future Generations Act

Council response

As shown on the RLDP key diagram and explained in Policy SP1 Sustainable Growth Strategy, St Athan is identified as being located in the Strategic Growth Area and it is therefore a location where new housing would be concentred. The allocation of this site accords with the strategy. It should be noted that the RLDP identifies different categories of housing sites, including key sites (KS1) and housing allocations (HG1). Due to its scale, the site at Clive Road is not considered to be 'key' or 'strategic' for the purposes of the RLDP strategy, but the strategy does still allow for the allocation of non-strategic/key housing allocations in the Strategic Growth Area.

With regards to the comments that the site is delivery led rather than policy led, it must be noted that, as well as being in accordance with the strategy, sites must be demonstrated to be deliverable, and this is a factor in the site selection process.

The site is not considered to be contrary to Policy SP10 on Sustainable Transport (and Policy SP7 of the adopted LDP), as these policies states that new development should be located in sustainable and accessible locations where a range of services and facilities are within walking and cycling distance. New developments should be designed to encourage walking, cycling and public transport use as alternatives to private car use. As detailed above, the site is adjacent to an Active Travel route with a bus stop in close proximity. In accordance with the policy, there will also be a requirement to make appropriate contributions towards further sustainable transport provision through the planning process.

The policy matters contained in adopted LDP Policy MD2 – Design of New Development are covered by new RLDP policies including PDG1 Creating Well designed and inclusive places and DNP5 Environmental Protection. At planning application stage consideration will be given to the detail of how each criterion is met.

In terms of conformity with Future Wales, the representation from Welsh Government concluded that the Deposit RLDP is in general conformity with Future Wales and specific policies within it.

In principle, it is considered that the allocation would accord with the placemaking principles set out in PPW. The detail will be a matter for consideration at planning application stage.

With regards to Green Infrastructure, the site submission was supported by an Ecological Assessment and there will be a need for a Green Infrastructure Statement to be submitted as part of the planning application process. The site will be required to achieve biodiversity net benefit.

The loss of open space has been discussed previously in the context of national planning policy, including TAN 16.

The preparation of the RLDP, including the identification of this housing allocation, has been undertaken in accordance with the Five Ways of Working set out in the Well-being of Future Generations Act, specifically:

- Long-Term: The allocation contributes to meeting identified housing need over the plan period, ensuring sustainable growth and addressing demographic requirements.
- Prevention: By allocating suitable and deliverable sites, the plan helps to avoid unplanned or speculative development and associated adverse impacts.
- Integration: The allocation has been considered alongside wider objectives, including addressing housing need, including transport, infrastructure, environmental protection, and community wellbeing.
- Collaboration: The plan-making process has involved engagement with key stakeholders, including statutory consultees and residents.
- Involvement: Public consultation has been undertaken at multiple stages, providing opportunities for communities to shape the plan and raise concerns.

The allocation therefore reflects a balanced and evidence-based approach consistent with the Well-being of Future Generations Act.

Issue – Timescales for Delivery

- The housing trajectory (Appendix 1 of the RLDP) identifies that development will commence in 2027/28 but this is considered unrealistic as no planning application has been submitted.

Council response

The housing trajectory dates have been determined through consultation with the site promoters/developers and reflect the position at the time of the publication of the Deposit Plan. However, the site has been subject to a pre-application consultation, a developer has an option agreement on the land and many of the necessary technical surveys have been

undertaken so there is no reason to assume significant delays in the site being brought forward.

The representation goes on to argue that as there is uncertainty on the delivery of this site in the earlier years of the plan period, additional sites with stronger prospects of short-term delivery should be allocated. However, it remains the Council's position that the site is deliverable in the short to medium term. The other site being suggested by the site promoter as an alternative is larger in size and not as far progressed in the planning process so is not realistically likely to be brought forward at an earlier opportunity.

Issue – Other Matters

- Clive Road residents will lose views of fields.
- Impact on house prices.
- Dust and noise during construction phase will impact on residents and pets.

Council response

With regards to the loss of the view of fields, it is well established in planning law that there is no statutory right to a private view. While it is acknowledged that the proposed development may alter the outlook from some neighbouring properties, this is not a material planning consideration in itself. The planning system seeks to protect living conditions in terms of matters such as privacy, daylight, sunlight, and overbearing impact, rather than the preservation of private views.

Concerns regarding a potential reduction in house prices are also noted; however, the effect of a development on property values is not a material consideration in planning decision-making. This position is well established through planning guidance and appeal decisions, which confirm that land and property values fall outside the scope of planning control.

In relation to potential disruption during the construction phase, it is recognised that some temporary disturbance is inevitable with any building works, this will normally be controlled at planning application stage through a planning condition requiring a Construction Environmental Management Plan (CEMP), which will set out detailed measures to manage construction impacts.

Council Overall Response

Following a detailed review of the full representations submitted in relation to Site HG1.8 Clive Road, St Athan, the Council acknowledges the breadth of concerns raised, including infrastructure capacity, transport impacts, environmental and heritage constraints and the loss of open space. Infrastructure delivery and appropriate mitigation will be essential to ensure that the development comes forward in a coordinated and responsible manner, and these matters have been considered in the allocation of the site. Further mitigation details

will be required at the planning application stage and controlled by appropriate planning conditions.

The Council considers that the allocation of HG1.8 remains sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

However, in light of the representation by the MOD Defence Infrastructure Organisation's (DIO) Safeguarding Team it is agreed than an additional statement should be included to identify the proximity of the MOD St Athan technical safeguarding zone as a constraint. The inclusion of this statement will provide clarity on consultation requirements for the application process, so it is proposed that additional text be added to Appendix 2 of the RLDP.

HG1.9 NORTH OF THE RAILWAY LINE, RHOOSE

Representation ID	Respondent Name	Representation Type
4978	Emma Reed [2653]	Comment
5676	Councillor Samantha Campbell [1002]	Object
6496	Mr Hywel Owen [2887]	Object
6499	Mrs Eve Owen [3609]	Object
6794	Network Rail (Miss Grace Lewis, Town Planning Technician) [691]	Comment
6987	Dwr Cymru Welsh Water: Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

A total of 6 representations were submitted in respect of HG1 (9) Land north of the Railway Line (East), Rhoose, raising a number of issues associated with the development of the site.

Each representation is summarised below and an individual response is provided.

STATUTORY CONSULTEE RESPONSES

Rep 6987– Dwr Cymru Welsh Water

Water Supply - Dwr Cymru Welsh Water has made representations on planning application ref 2022/00733/FUL. A hydraulic modelling assessment (HMA) will be required. A 3" diameter abandoned watermain crosses the site.

Wastewater - Dwr Cymru Welsh Water has made representations on planning application ref 2022/00733/FUL. A hydraulic modelling assessment (HMA) will be required. A 300mm pressurised rising main sewer crosses the site. The site is near to a Sewage Pumping Station (SPS) and we would recommend that the LPA discuss the potential allocation with their Environmental Health Department. To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.

Wastewater Treatment Works - Dwr Cymru Welsh Water has made representations on planning application ref 2022/00733/FUL. Cog Moors WwTW has capacity to accept foul flows from the proposed development.

Council Response

Comments noted. The requirement for a HMA and the WwTW have been noted in the Infrastructure Plan. However, reference to potential noise or odour nuisance caused by proximity to the Sewage Pumping Station (SPS) should be included. It is noted that the SPS is off-site and distanced approximately 50 metres from any proposed dwellings, as per the layout submitted with planning application ref 2022/00733/FUL. The SPS is also situated 15 metres from any developable area of the site and therefore should be not a design constraint.

Proposed Change

Include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- Water supply/sewerage - The site is near to a Sewage Pumping Station (SPS). To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.

INDIVIDUAL RESPONSES

Rep 6794 – Network Rail

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

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

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

Council Response

The comments are noted. The matter has been raised in Network Rail's comments on the current planning application (2022/00733/FUL) and it is anticipated the issue can be resolved by way of an appropriately worded condition.

Network Rail's comments that this should be recognised as a constraint within the RLDP are accepted. It is therefore proposed that appropriate wording is included in Appendix 2 to highlight this constraint.

Proposed Change

Include the following statement in the key site issues and constraints section of Appendix 2

- The Happy Valley Level Crossing is located to the south of the site and developers must consult with Network Rail to demonstrate that safety will not be compromised or that mitigation measures will be incorporated to prevent any increased safety risk.

5676 – Campbell - Object

The plan doesn't show the already increased effects of flooding over the railway line onto properties below. This needs to be addressed. Also, the community green spaces/multi use space is not sustainable without communication with local community groups about usage, and sufficient parking/changing availabilty. Entrance on Pentir Y De needs addressing as it is a blind turning on the road from the estate and access cannot be from the South Point school side as this would create a 'rat run' down a straight road without traffic management in place.

Council Response

In addition to planning permission, formal approval from the SuDS Approval Body (SAB) is also required, and a comprehensive SuDS plan must be agreed upon before any construction begins. Currently, surface water follows natural, uncontrolled topography, which contributes to runoff. By allocating this site, any future development will be required to engineer drainage solutions - such as swales and attenuation basins - that collect and store water on-site. This controlled approach is designed to ensure that runoff rates do not exceed "greenfield" levels and, in many cases, can actually improve the current situation for neighbouring properties by preventing uncontrolled overflow toward the railway line.

The comments on the community green spaces are noted. However, the provision of appropriate open spaces within a development is a key element of the overall placemaking for the site.

The Council's Highways department was consulted throughout the plan preparation process. Highways officers are satisfied that viable access points exist via Pentir y De and Rhoose Way. Detailed assessments of the internal road layout, bus stops, and active travel routes will follow at the formal application stage to meet all departmental standards.

A detailed layout is provided as part of the planning application. The highways department were consulted on the application and advised that they have no objections to the proposals, including the access, subject to specific conditions.

6496 - Hywel Owen – Object
6499 - Eve Owen – Object

A significant quantity of raw sewage is overflowing in the Fontygary area. Welsh Water have stated that the Vale Council are aware that the present sewage system is beyond capacity and that while the Council continues to approve further building works this will only further deteriorate. My main concern is the health risks associated with sewage overflow. I therefore object to any future developments in Rhoose until such time as a new sewage system is in place and has been given time to prove to work effectively. We would also

request that a member of the planning department reply to us by email and answer two questions:

1. Are they ignorant of the sewage backup/ capacity problems in Rhoose?
2. If they are aware of the current sewage problem how can they recommend any further building development in the Rhoose area?

Council Response

The Council have consulted with Dwr Cymru Welsh Water (DCWW) as a statutory consultee throughout the plan making process and also in respect of the current planning application (2022/00733/FUL).

There will be a requirement for hydraulic modelling in respect of the sewerage network. Should this identify any capacity issues, the developer will be required to address this.

4978 – Reed - Comment

This is the maximum housing Rhoose should take over the next 10 years. There should not be additional allocation even considered until this is built.

Council Response

The suggestion to halt further allocations for 10 years does not align with the statutory requirements for the RLDP, which must ensure a steady supply of deliverable land until 2036. National planning policy requires the Council to maintain a trajectory that ensures housing delivery is phased throughout the 15-year plan period. HG1 (9) is expected to be developed in phases across 6 years, while the Key Site at Readers Way is to be phased across 8 years. The development is to be phased appropriately to ensure the delivery of infrastructure required to support the settlement, such as provision/contribution to active travel, education capacity and community facilities.

HG2.1 LAND AT UPPER COSMESTON FARM, PENARTH

Representation ID	Respondent Name	Representation Type
4434	Mr Corrado Ruta [2774]	Comment
4533	Mr Leon Duke [2841]	Object
4679	Ms Elias Elias [2883]	Object
4757	Mr Michael Hooper [2919]	Object
5448	Mr Morgan Williams [3263]	Object
5596	Mr Jonathan Lambert [3226]	Object
6122	Barry & Vale Friends of the Earth [708]	Comment

7 Representations were submitted in respect of allocation HG2.1 Land at Upper Cosmeston Farm (2 comment and 5 objections) raising a number of issues associated with the development of the site. These have been summarised below and full Council response has been provided to address the issues raised as a composite response.

COMMENTS/OBJECTIONS

Issues Raised

- Concern that development may negatively affect the proposed Cosmeston–Sully active travel route along the old railway line.
- Objection to any housing development on what is considered Heritage Coast, arguing it should be preserved and not used for residential expansion.
- Unclear site boundaries due to coastal rollback
- Missing plans for biodiversity enhancement and community land
- The area has insufficient infrastructure—including roads, schools, and shops—to support additional housing.
- Concerns that development would have a detrimental environmental impact and negatively affect the local community.
- Flood risk and lack of a confirmed flood-free/resilient access route
- Land west of Upper Cosmeston Farm described as a former landfill site, posing contamination concerns.
- Ongoing coastal erosion of adjacent cliffs.
- Visual impact on the Vale's Heritage Coast.
- Threat to wildlife, including protected bats and roosts.
- Additional traffic and environmental harm from an estimated 576 extra cars.
- There is no railway connection.
- The site is not proven to be viable or compliant with Welsh Government planning requirements.
- Lack of a Stage 3 Site-Specific Viability Assessment

- The site's outline planning permission isn't finalised and should not be used as a "landbank" to roll forward.
- Contradicts Delivery & Monitoring Framework requirements.

Council Response

In response to representations made on site HG2.1 Land at Cosmeston Rd, this site is one of a number of existing adopted LDP sites listed under HG2 that have been carried forward as major land bank sites. These sites are all the subject of extant planning permission, or with a resolution to grant planning permission subject to the signing of a Section 106 agreement. By virtue of the planning permission, the principal acceptability of these sites has been agreed.

In respect of Land at Upper Cosmeston Farm, outline planning permission (reference 2020/01170/OUT) was granted permission subject to s106 agreement in February 2024. The site specific concerns that were raised as part of the Deposit RLDP consultation relating to traffic and transport, infrastructure, natural environment, heritage, nature conservation and coastline erosion are matters that were previously raised to the planning application and have been fully considered by the Council in the determination of the planning application, as detailed within the officer's report to planning committee on the 22nd February 2024.

With regard to comments that the site is located within the Heritage Coast, this is inaccurate as the Glamorgan Heritage Coast Designation is located within the Western Vale, between St Athan and Ogmore by Sea.

Representations raise concerns about the omission of viability evidence for the site. As stated, the site is the subject to an outline planning permission presently subject to signing of a s106 agreement. Concerns in respect of the site's viability to support the requisite planning policy requirements for affordable housing and necessary planning obligations for supporting infrastructure were not raised by the landowner (in this case the Welsh Government) and as such did not necessitate a requirement for viability appraisal to be undertaken. The Council understands that a contract has been agreed with a developer to deliver the site and requisite infrastructure, with development viability having been considered by the Welsh Government, as the landowner, through the bidding process as part of the disposal for the site.

With regard to the impact of the proposal on the Cosmeston -Sully active travel route, the development at Cosmeston shall contribute towards its delivery, with part of the active travel route running through the site via the disused railway line. Additionally, the site will contribute towards the provision of active and sustainable transport infrastructure.

Therefore, the Council considers that the Site HG2 (1) remain sounds, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

HG2.2 LAND BETWEEN THE NORTHERN ACCESS ROAD AND EGLWYS BREWIS ROAD (SITE A - WESTERN PARCEL), LLANTWIT MAJOR

Representation ID	Respondent Name	Representation Type
5182	Llantwit Major Town Council (Clerk) [230]	Support
5196	Welsh Government (Housing and Regeneration Directorate) [3162]	Support
5636	Mr Derek Massey [3323]	Comment
5729	Mr Graeme Smith [3029]	Comment
5824	Mrs Julie Massey [3390]	Comment
5992	Mr Philip Taylor [3439]	Object
6362	Mervyn Page [3558]	Object
6457	Llanmaes Community Council (Mrs C Alexander, Clerk) [240]	Comment

8 Representations (2 support, 2 objections and 4 comments) were submitted in respect of the Housing Allocation HG 2.2 Land between the Northern Access Road and Eglwys Brewis Road (Site A - Western Parcel), raising a number of issues associated with the development of the site. These have been summarised below and a full Council response to each issues raised is provided in the composite response below.

SUPPORT

5182- Llantwit Major Town Council

5196- Welsh Government (Housing and Regeneration Directorate)

Council response

Support is noted.

COMMENTS/OBJECTIONS

Issues Raised

- There has not yet been agreement reached on a Developer Contribution for the site since receiving planning permission.
- There has been no progress on the site since approval.
- Additional building in this site would be an excess for the local area.
- Ignores infrastructure, environmental, traffic and sewerage considerations.
- Picketston Lane should be reviewed due to the large traffic implications from recent applications

Council Response

In response to representations made on site HG2.2 Land between the Northern Access Road and Eglwys Brewis Road (Site A - Western Parcel), this site is one of a number of existing adopted LDP sites listed under HG2 that have been carried forward as major land bank sites. These sites are all the subject of extant planning permission, or with a resolution to grant

planning permission subject to the signing of a Section 106 agreement. By virtue of the planning permission, the principle of development of these sites has been agreed.

In respect of Land between the Northern Access Road and Eglwys Brewis Road, the site is owned by the Welsh Government. Outline planning permission 2020/00352/OUT was approved in March 2021, pending the signing of a s106 agreement. The representations received in relation to the Deposit RLDP relating to traffic and infrastructure are matters that were been fully considered by the Council in the determination of the planning application, as detailed within the officer's report to planning committee.

In response to comments made in relation to the outstanding s106 agreement, the Welsh Government has advised through representations made on the Deposit RLDP that this will be progressed in due course, and it is their intention to develop a detailed masterplan for the 3 adjacent sites in their ownership allocated within the Deposit Plan which adjoin each other (HG2.2, HG2.3 and HG1.5). Welsh Government have only recently confirmed ownership of the central parcel of land (Site C), following a land ownership tribunal which has delayed the delivery of the wider site.

The Council considers that the allocation of Site HG2 (2) remains sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

HG2.3 LAND BETWEEN THE NORTHERN ACCESS ROAD AND EGLWYS BREWIS ROAD (SITE B - EASTERN PARCEL), LLANTWIT MAJOR

Representation ID	Respondent Name	Representation Type
5197	Welsh Government (Housing and Regeneration Directorate) [3162]	Support
5254	Llantwit Major Town Council (Clerk) [230]	Support
5637	Mr Derek Massey [3323]	Comment
5825	Mrs Julie Massey [3390]	Comment
6009	Mr Philip Taylor [3439]	Object
6364	Mervyn Page [3558]	Object
6410	Mr David Harris [2291]	Object
6458	Llanmaes Community Council (Mrs C Alexander, Clerk) [240]	Comment

8 Representations (2 support, 3 objections and 3 comments) were submitted in respect of the Housing Allocation HG 2.3 Land between the Northern Access Road and Eglwys Brewis Road (Site B - Eastern Parcel), raising a number of issues associated with the development of the site. These have been summarised and a full Council response to each issues raised is provided in the composite response below.

SUPPORT

5197 - Welsh Government (Housing and Regeneration Directorate)

5254- Llantwit Major Town Council

Council response

Support is noted.

COMMENTS/OBJECTIONS

Issues Raised

- There has not yet been agreement reached on a Developer Contribution for the site since receiving planning permission.
- There has been no progress on the site since approval.
- Additional building in this site would be an excess for the local area.
- Ignores infrastructure, environmental, traffic and sewerage considerations.
- Picketston Lane should be reviewed due to the large traffic implications from recent applications
- Site is located in proximity to a live firing range used daily by the Army

Council Response

In response to representations made on site HG2.2 Land between the Northern Access Road and Eglwys Brewis Road (Site A - Western Parcel), this site is one of a number of existing adopted LDP sites listed under HG2 that have been carried forward as major land bank sites. These sites are all the subject of extant planning permission, or with a resolution to grant planning permission subject to the signing of a Section 106 agreement. By virtue of the planning permission, the principle of development of these sites has been agreed.

In respect of Land between the Northern Access Road and Eglwys Brewis Road, the site is owned by the Welsh Government. Outline planning permission 2020/00351/OUT was approved in March 2021, pending the signing of a s106 agreement. The representations received in relation to the Deposit RLDP relating to traffic, infrastructure and noise from the MOD firing range are matters that were been fully considered by the Council in the determination of the planning application, as detailed within the officer's report to planning committee.

In response to comments made in relation to the outstanding s106 agreement, the Welsh Government has advised through representations made on the Deposit RLDP that this will be progressed in due course, and it is their intention to develop a detailed masterplan for the 3 adjacent sites in their ownership allocated within the Deposit Plan which adjoin each other (HG2.2, HG2.3 and HG1.5). Welsh Government have only recently confirmed ownership of the central parcel of land (Site C), following a land ownership tribunal which has delayed the delivery of the wider site.

Therefore, the Council considers that the allocation of Site HG2 (3) remains sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

HG2.4 LAND SOUTH OF LLANDOUGH HILL / PENARTH ROAD, LLANDOUGH

Representation ID	Respondent Name	Representation Type
4397	Mr Tim Hackett [2751]	Object
6118	Barry & Vale Friends of the Earth [708]	Object

A total of Representations (2 objections) were submitted in respect of the Housing Allocation HG 2.4, Land south of Llandough Hill / Penarth Road raising a number of issues associated with the development of the site. These have been summarised below and a full Council response to each issues raised is provided in the composite response below.

COMMENTS/OBJECTIONS

Issues Raised

- Negative impact on natural habitat.
- Increased traffic congestion.
- The site appears to be unviable, and no viability appraisal has been provided.
- Prone to flood risk and no drainage scheme has been approved.

Council response

In response to representations made on site HG2.4 Land south of Llandough Hill / Penarth Road, this site is one of a number of existing adopted LDP sites listed under HG2 that have been carried forward as major land bank sites. These sites are all the subject of extant planning permission, or with a resolution to grant planning permission subject to the signing of a Section 106 agreement. By virtue of the planning permission, the principal acceptability of these sites has been agreed

Full permission planning permission 2020/01590/HYB was granted on in June 2025, following consideration by planning committee March 2023 where it was deferred for the completion of a Section 106 agreement. The representations received in relation to the Deposit RLDP relating to traffic, infrastructure, and flood risk are matters that were been fully considered by the Council in the determination of the planning application, as detailed within the officer's report to planning committee in March 2023. In respect of viability, this matter was also considered by the Council in the determination of the approved planning permission, and the site was subject to viability appraisal.

Therefore, the Council considers that the allocation of Site HG2 (4) remains sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

HG3 – HOUSING LED REDEVELOPMENT OPPORTUNITY – FORMER EAGLESWELL PRIMARY SCHOOL

Representation ID	Respondent Name	Representation Type
4535	Mrs Carol Morgan [2842]	Support
4593	Mr David Barton [2683]	Comment
4695	Llantwit Major Town Council (Clerk) [230]	Object
5181	Llantwit Major Town Council (Clerk) [230]	Support
6781	Persimmon Homes (East Wales) [1068]	Comment
6914	Barratt Redrow Homes [2669]	Comment
6988	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

A total of 7 representations were submitted in respect of the HG3.3, raising several issues associated with the development of the site. There was support for the removal of the temporary accommodation currently on the site, but the view was expressed that it should be redeveloped as a health centre and/or an older persons care facility. Concern was also expressed about design and the potential for the double counting of the housing units. The representations are summarised below with responses provided.

STATUTORY CONSULTEE RESPONSES

6988 - Dwr Cymru Welsh Water - comment

- Water Supply - The water network can supply the proposed development. 110mm diameter watermain crossing the site.
- Wastewater - The public sewerage network can accept potential foul flows from this development site. A 225mm diameter foul sewer crosses the site.
- Wastewater Treatment Works - Llantwit Major WwTW has capacity to accept foul flows from the proposed development.

Response:
The comments are noted. The proposal relates to a redevelopment of an existing site which is currently served by the water and sewerage network.

INDIVIDUAL RESPONSES

4535 - Morgan – Support

I support permanent council housing on this site, the quicker the temporary units are removed the better. Space needs to be left on site for a much needed health centre.

Council Response

Support for the development is welcomed. Within the supporting text of policy HG3, paragraph 6.111 states that, subject to identified need at the time of redevelopment, there may also be potential for part of the site to accommodate appropriate community uses, which could include a health centre where a demonstrable need is identified.

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. The Council shall continue to work with the Health Board, advising them of when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparation, and formal consultation on subsequent planning applications, will explore opportunities for the provision of health facilities, for example through the identification of land for new health facilities, the provision of facilities on key sites as part of community facilities contributions, and/or through multi-use community buildings.

The specific requirement to reserve on-site space for a health centre is not considered necessary or justified at this stage of plan preparation, as any such provision would be determined through the identified need at the time of redevelopment and through continued engagement with the Health Board, rather than being fixed in advance through the site allocation itself. The wording of community uses ensures that the space can be used for a range of potential uses that will benefit local residents.

4593 - Barton – Comment

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

Council response

The temporary accommodation on the site is proposed to be relocated rather than demolished.

The Deposit RLDP is not intended to set out site-specific design codes in this level of detail. These matters will be developed further and subject to consultation at the planning application stage.

4695 - Llantwit Major Town Council - Object

At the Full Town Council meeting held on 29 the January 2026, the Town Council was presented with an agenda brief and discussed the future of the former Eagleswell School site.

Councillors noted that the Vale of Glamorgan Council has identified this site for a housing development, when the temporary housing units are removed. There is also ongoing support for a Health Centre to be built on this land, which the Town Council has always

argued for. Unfortunately, there has been no meaningful commitment from the Health Board to build the much needed Health Centre on the site, but the Town Council will continue to push for this.

Without diminishing our wish for a Health Centre, the Town Council wish to petition the Vale of Glamorgan Council to commit to building an Old People's Care Facility on the site. It is felt that the site is large enough to accommodate all these services. Barry has several Old People's Care facilities, as does Penarth. Cowbridge has one and there are private facilities in Rhoose and St. Athan. There is nothing in Llantwit Major despite its growing population and there is a clear need for a facility as there is clear evidence Llantwit Major is an ageing population. The Town also needs increased provision for pensioners accommodation as Crawshay Court is the only Council facility in the Town, and we have received reports that this is in need of works and
updating.

Council response

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. The Council shall continue to work with the Health Board, advising them of when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparation, and formal consultation on subsequent planning applications, will explore opportunities for the provision of health facilities, for example through the identification of land for new health facilities, the provision of facilities on key sites as part of community facilities contributions, and/or through multi-use community buildings.

The specific requirement to reserve on-site space for a health centre is not considered necessary or justified at this stage of plan preparation, as any such provision would be determined through the identified need at the time of redevelopment and through continued engagement with the Health Board, rather than being fixed in advance through the site allocation itself. The wording of community uses ensures that the space can be used for a range of potential uses that will benefit local residents.

As stated within the supporting text to Policy HG3, the site is owned by the Council's Housing Department and is expected to come forward as an affordable housing-led development. The precise form of development, including the mix and type of accommodation and the needs of specific demographic groups that may be addressed, will be determined by the Council's Housing Department as the site progresses through the development process.

The Council acknowledges the representation regarding the potential provision of an older persons' care facility and additional accommodation for older residents in Llantwit Major. This, alongside other potential development options for the site, will be considered by the Council's Housing Department in light of identified housing needs.

5181 - Llantwit Major Town Council - Support

We note that the proposal is to co-locate health and social care facilities and for the Vale of Glamorgan Council (VoG) to engage with Cardiff and the Vale University Health Board to explore opportunities for the co-location of health and social care services within new community space. The land at the former Eagleswell Road School site has been identified for redevelopment and the Town Council wishes to re-emphasise that this site is used for health and social care. Llantwit Major has an increasing population, a significant number of which are aging and the current health and social care facilities for the town and its neighbouring areas (especially St Athan proposals) are inadequate and in some cases outdated. This is an ideal opportunity to use this site appropriately for the residents and we wish the RLDP to recognise this.

Council response
As previously stated, in preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. The Council shall continue to work with the Health Board, advising them of when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparation, and formal consultation on subsequent planning applications, will explore opportunities for the provision of health facilities, for example through the identification of land for new health facilities, the provision of facilities on key sites as part of community facilities contributions, and/or through multi-use community buildings.

The specific requirement to reserve on-site space for a health centre is not considered necessary or justified at this stage of plan preparation, as any such provision would be determined through the identified need at the time of redevelopment and through continued engagement with the Health Board, rather than being fixed in advance through the site allocation itself. The wording of community uses ensures that the space can be used for a range of potential uses that will benefit local residents.

6781 - Persimmon Homes (Boyer Planning) - Comment

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

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

Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent

accommodation, any future dwellings will not be included within the RLDPs housing supply figures.

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

In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 that any future dwellings will not be included within the RLDPs housing supply figures to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.

Council response

The position of the Council is made clear within 6.111 that the housing numbers will not be doubled counted if future development takes place on the site. It is therefore felt that changes to the location or specific wording of the policy is not necessary as the Council's position is clear.

6914 – Barratt Redrow Homes (Boyer Planning) - Comment

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

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

Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures.

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

Council response

The position of the Council is made clear within 6.111 that the housing numbers will not be doubled counted if future development takes place on the site. It is therefore felt that changes to the location or specific wording of the policy is not necessary as the Council's position is clear.

POLICY HG4 - RURAL AFFORDABLE HOUSING LED SITES

This section sets out the representations made on the four rural affordable housing led sites allocated under Policy HG4:

- HG4.1 Land to the East of Colwinston
- HG4.2 Land west of Maendy Road, Aberthin
- HG4.3 Land at Heol Fain, Wick
- HG4.4 Land north of West Winds Business Park, Fferm Goch

General comments on the policy approach in HG4 are included in the Affordable and Specialist Housing section of the Plan.

HG 4.1 LAND EAST OF COLWINSTON

Representation ID	Respondent Name	Representation Type
4418	Mr Chris Blight [2763]	Object
4425	Mr Dominic Thompson [2767]	Object
4435	Mr Martin Brand [2775]	Object
4440	Mr Tom Prosser [2778]	Object
4442	Mr Tom Prosser [2778]	Object
4462	Ms Sian Hooper [2795]	Object
4477	Mr Rob G Thomas [683]	Object
4547	Mr Rob G Thomas [683]	Object
4771	Mr Huw Evans [2933]	Object
4776	Dr Gillian Smith [2938]	Object
4806	Mr Rob G Thomas [683]	Object
4934	Mrs Karen Jacobs [2746]	Object
4966	Mrs Karen Jacobs [2746]	Object
5055	Mr Alan McNee [3101]	Object
5160	Mr David Frost [3149]	Object
5185	Mr Edward Lewis [3154]	Object
5194	Mr Roger Picton [3158]	Object
5235	Mr James Charlesworth [3182]	Object
5245	Anthony & Samantha Richardson [3192]	Object
5246	Anthony & Samantha Richardson [3192]	Object
5248	Mrs Judith Hemming [3193]	Object
5250	Mr Gareth Allen Jones [3195]	Object
5262	Jackie Murphy [3197]	Object
5263	Jackie Murphy [3197]	Object
5272	Kathleen Jones [3199]	Object
5275	Rhian Cleaver [3201]	Object
5287	Mr Alun Austin [3210]	Object
5443	Mr Luke Davies [3258]	Object
5445	Mrs Marie Campbell-Davies [3261]	Object
5468	Mrs MICHELLE DAVIES [3267]	Object
5520	Mr Brian Morris [3283]	Object
5567	Mrs Carole Billett [3299]	Comment
5629	Mr Simon Campbell-Davies [3320]	Comment

5707	Mr and Mrs G.W. & N.E. Bates [3337]	Object
5757	Elizabeth Howard [3355]	Object
5799	Mr Anthony Jones [3377]	Object
5875	Mr Andrew Murphy [3408]	Object
5934	Mr Philip Jacobs [3429]	Object
5945	Mrs Claire Hereward [3437]	Object
5959	Mr Rhys Davies [3442]	Object
5977	Mr Alan Horton [3446]	Object
6008	Mr John Lloyd [3448]	Object
6031	Miss Caroline Nightingale [3458]	Object
6058	Mr Stuart Thomas [3460]	Object
6258	Mr Stephen Wayne Jones [3504]	Object
6259	Mrs MICHELLE DAVIES [3267]	Object
6298	Mr Kevin Darke [3527]	Object
6300	Mr Ioseff Davies [3528]	Object
6311	Mr Brett Clee [3536]	Object
6323	Mrs Nikki Hatch [2814]	Object
6340	Mrs Susan jayne Morris [1484]	Object
6342	Mr Rhydian Davies [2806]	Object
6368	Mr Peter Graham-Woollard [3436]	Object
6375	Mr Terry Morgan [3562]	Object
6381	Mrs Tess Lewis [3565]	Object
6423	Mr Simon Beeston [3345]	Object
6426	Amy Hearne [3583]	Object
6472	Mrs Rebekah Louise Davies [3598]	Object
6517	Mr Peter Graham-Woollard [3617]	Object
6556	Julia Olson [3441]	Object
6640	Colwinston Community Council (Mrs C Roach, Clerk) [232]	Object
6665	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6989	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7053	Marion morgan [2413]	Object
7155	Peter Stone Properties Ltd [1182]	Object
7176	Wig Fach Property Company Ltd [2373]	Object

66 Representations were submitted in respect of the Affordable Housing Led Allocation HG4.1 Land East of Colwinston (64 objections, 2 comments) by 60 individual respondents, raising a number of issues associated with the development of the site. It should be noted that some representors submitted more than one representation in respect of the site. Duplicate representations have only been counted once, but if representations made different points, these have been counted separately.

Several respondents made representations on the candidate site (4069) rather than the allocation and/or the associated changes to the settlement boundary. As these object to the principle of the housing allocation, these are dealt with under this response.

Representations objecting to the site seek the deletion of HG4.1 from the RLDP and reinstatement of the original settlement boundary.

The key issues raised were concerns about traffic, highways, road safety and public transport as well as flooding, drainage & infrastructure. Further concerns were raised about a lack of services and facilities, the impact on village character, heritage and the conservation area, settlement boundary objections, agricultural land loss / environmental impact and the scale of development. It was also questioned why the site was included when previous assessments showed the site was unsuitable. Alternative sites were also suggested.

The statutory consultee response from DCWW has been addressed first. As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

STATUTORY CONSULTEE RESPONSES

6665 - Natural Resources Wales (NRW)

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

Council Response

The comments are noted. The potential sensitivity of the site's hydrological setting has been considered through the submitted Drainage Strategy & Flood Risk Assessment (October 2022). The report confirms that the site is currently a greenfield agricultural parcel and outlines a drainage strategy that has been specifically designed to protect groundwater and downstream receptors.

It is noted that the 2022 assessment was undertake for the original larger candidate site submission (CS 435) and a new assessment will be required to support any future planning application. Any future drainage proposals will be subject to approval by the Vale of Glamorgan Sustainable Drainage Approval Body (SAB)

Notwithstanding this, the larger site acknowledge the need to safeguard ground water sources and therefore proposed a SuDS treatment, including permeable paving, bioretention areas (rain gardens), swales and detention basins to provide interception and treatment of surface water, removing pollutants such as sediments, hydrocarbons Accordingly, the Council is satisfied that the initial drainage strategy recognises the need to safeguard groundwater and the requirement for the site developer to undertaken a further

drainage assessment for the smaller site shall ensures that pollution risks can be effectively managed and mitigated at the detailed design and construction stage.

For completeness, NRW's comments will be included in Appendix 2 of the RLDP as a key site constraint.

Proposed Change

Add the following to Appendix 2 of the RLDP

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.

6989 Dwr Cymru Welsh Water

Water Supply - The water network can supply the proposed development. Wastewater - The public sewerage network can accept potential foul flows from this development site. Wastewater Treatment Works - Cowbridge WwTW has capacity to accept foul flows from the proposed development.

Council response

The comments are noted. As part of previous consultations with DCWW, it was highlighted that a clean water hydraulic modelling assessment may be needed depending on how many units are proposed in Colwinston. This potential requirement is highlighted in the Infrastructure Delivery Plan, along with the other comments raised by DCWW.

COMPOSITE RESPONSE

<u>Issue - Traffic, Highways & Road Safety and Public Transport</u>

- Existing village roads are narrow, unsafe, and unable to cope with additional traffic.
- Significant congestion already occurs at school drop-off/pick-up times.
- Increased vehicles (estimated 35–50 additional cars for 25 homes) would heighten danger to children and pedestrians.
- Access via Heol Cae Pwll is unsuitable; roads are unadopted and deteriorating.
- Junctions onto the A48 are already hazardous for drivers, walkers, and cyclists.
- No bus service within the village; nearest bus stop is 1 mile away along an unlit, unsafe road, residents are entirely dependent on cars
- Lack of safe pavements, footways, cycling routes, or lighting.
- Development would not support active travel.
- Development traffic would intensify already hazardous school environment.

Council Response

In considering the suitability of the site, the Council's Highway Department has assessed the proposed access via Heol Cae Pwll and have deemed that the site assess point would be acceptable to serve the proposed 25 dwellings on the provision that it is designed to the satisfaction of the Council. In respect of the current unadopted status of Heol Cae Pwll, this is currently the subject of ongoing discussions with the Council who envisage that this will be resolved in the near future. Additionally, the site promoter also retains land ownership of the access point via Heol Cae Pwll, therefore the current unadopted status of the highway would not impact on the ability to access the proposed housing development.

The Active Travel Network Map identifies a future walking and cycling route between the A48 and Colwinston (referenced Future 001A), linking to a future walking and cycling route along the A48 (Future 004H). Welsh Government Active Travel funding was received in September 2021 to look at active travel improvements from the A48 to Colwinston, to connect with the school and bus routes. A route option consultation was held in February 2022, which sought the views of residents on potential route options. Due to funding, the scheme has not progressed beyond concept design stage.

Whilst public transport options are limited, they are not entirely absent. Currently a bus service operates on the A48, approximately 1.5km away, providing connections between Cardiff and Bridgend with approximately one bus per hour in each direction.

In addition, the Council is tendering for 3 additional rural Vale bus services. This is likely to include a service between Llantwit Major and Bridgend which will serve Colwinston, providing at least 4 services per day in each direction.

The Council also operates the Greenlinks Community Transport scheme, which provides demand-responsive transport across the rural Vale of Glamorgan. Greenlinks offers a practical and affordable solution for residents who may have difficulty accessing essential services and amenities. The scheme operates a fleet of accessible minibuses and cars which can be booked.

Additionally, a contribution toward improving Sustainable Transport within Colwinston will be a requirement of a future planning permission being granted, as set out in Appendix 2 of the Plan. It is also noted that the site is in close proximity to St Davids Church in Wales Primary School and as such the site is within walking distance for primary school children that may attend.

Issue - Flooding, Drainage & Infrastructure

- Existing drainage and sewerage systems are insufficient and already problematic due to the presence of underlying limestone.
- Historical flooding in nearby fields and roads; concerns that the site worsens surface water issues.
- Unresolved drainage issues from the adjacent Heol Cae Pwll development.
- Capacity concerns at Cowbridge Wastewater Treatment Works.

- Dwr Cymru Welsh Water infrastructure confirm capacity to support the development.
- No gas main connection.

Council Response

With regard to waste water and sewage capacity concerns, the Council has consulted with Dwr Cymru Welsh Water, and they have advised that the site falls within the catchment area of Cowbridge Wastewater Treatment Works (WwTW) which has capacity to accommodate the domestic foul flows from this site. DCWW has also confirmed that the public sewerage network can accept potential foul flows from this development site and that the water network can supply the proposed development.

In respect of concerns raised regarding flooding the site, the NRW Flood Map for Flooding indicate that the site is located within Zone A, i.e. a site which is considered to be 'at little or no risk of fluvial or coastal/tidal flooding'. The site is also not affected by surface water or small watercourses flooding.

A flood and drainage study has been undertaken by the site promoter to identify any potential risks of flooding within the site and to evidence how site drainage would be managed, including surface water run-off. The study identifies the presence of limestone geology, and recognises potential limitations associated with limestone geology, the proposed drainage solution for the management run off has been designed around these soil conditions to ensure that the development would not exacerbate known issues. This proposes that surface water be managed through controlled discharge to the existing Cae Pwll Phase 1 infrastructure at restricted greenfield rates.

An initial site layout for the development has been submitted to the Council which proposes that this area be free from built development and will be the location for the sustainable drainage system to manage surface water run-off. Additional detail design will be required to accompany any future planning application and would be required to designed to the satisfaction of the Council's Drainage Team.

Since 2019 provision of SuDs have been required in Wales to assist in achieving sustainable development in respect of flooding and drainage on new developments. This process is administered by the Council through the SuDS Approval Body (SAB) and they must approve a SuDS scheme before development can commence. Accordingly, the Council is of the opinion that appropriate measures are in place to ensure that development of the site shall only proceed once detailed surface water and drainage mitigation measures have been identified and approved by the Council.

With regard to the absence of gas and mains electricity, it is understood that the recent housing development at Cae Pwll is serviced by kerosene heating system, the availability of electricity supply has been confirmed by the site promoter through its consultation with Western Power Distribution.

Issue – Lack of Services and Facilities

- No shops in Colwinston
- No healthcare provision

Council Response

There is a small shop and café in Colwinston selling a limited number of essential items, although it is acknowledged that opening hours are limited, and residents would need to travel outside of the village for a wider range of retail provision. The nearby service centre of Cowbridge has range of convenience and comparison stores. This can be accessed by sustainable transport modes, including Greenlinks, with proposed improvements planned to rural bus service provision.

The scale of the proposed development is also unlikely to generate a level of demand sufficient to support a new shop within the village. Nevertheless, additional residents would help sustain existing community facilities and services in the wider area and contribute to the vitality of the rural community.

The absence of a healthcare facility within Colwinston is not unusual for a settlement of its size. Primary healthcare services are available in the nearby settlement of Cowbridge, which can be accessed by the Greenlinks service for those residents without a private car.

It is acknowledged that Colwinston is not as sustainable as larger settlements in the Vale. It does not have as extensive a range of services, and sustainable linkages are acknowledged to not be as strong as within the larger settlements. Consequently, it would not be appropriate to direct significant and strategic allocations to this location. However, the size and nature of the proposed allocation is reflective of critical affordable housing need in the Vale, and identified housing need locally. The issues and specifics relating to the level of affordable housing need are discussed in the section below. However, it is considered that the size of proposed allocation represents an appropriate balance between housing need, and the sustainability of the location which.

Issue - Impact on Village Character, Heritage & Conservation Area

- Site lies in the rural setting of a designated Conservation Area and County Treasure.
- Further development would erode historic character, landscape, rural setting, and important views.
- Overdevelopment would harm community cohesion and change village identity.
- Inclusion of this site is not supported by the Integrated Site Assessment.

Council Response

A heritage impact assessment for the proposal has been provided by the site promoter which has considered the potential impacts on any archaeology and built heritage features. The report which was undertaken for the larger candidate site submission indicated that there were no archaeological works with the site.

In terms of built heritage, the appraisal notes three designated heritage assets with 100m of the Grade II Listed Village House (Cadw ref. 13405), Grade II Listed the Sages (Cadw ref. 13410), and the Colwinston Conservation Area, located immediately south of the site. The appraisal highlighted that the main impact would be on the views within the site to the conservation area (to the north and south conservation area boundaries) and therefore proposed green areas with the site layout to provide buffer zones to maintain these views. With the reduction in the size of the site, it is considered that the impact on the Colwinston Conservation area observed is likely to be reduced. Further consideration on the potential impacts on the setting of the conservation area and any appropriate site mitigation measures through design and layout will be required as part of any future planning application submission.

The site has been considered by the Council through the candidate sites assessment methodology (Background Paper BP 18A) and as part of the Council's Integrated Sustainability Appraisal (ISA) for the Deposit Plan. The scoring methodology is set out in Table AD2 of the ISA. It is recognised that there are elements of the site assessment that score negatively in the ISA. This is due to the site's location in a minor rural settlement which, by its nature, does not have the full range of services and facilities that other settlements may have. However, the site does score positively in the provision of homes and proximity to a primary school. The strategy allows for affordable housing led sites to be allocated in minor rural settlements.

Issue - Settlement Boundary Objections

- Objections to the *redrawing of the settlement boundary* to include Site 4069.
- Boundary change considered unjustified, unsupported by evidence, and contrary to planning policy.

Council Response

The Council has undertaken a review of the settlement boundaries identified within the existing Adopted LDP. The methodology for this is review is set out in Background Paper BP46. New boundaries have been redrawn where additional housing allocations have been proposed within the Deposit RLDP.

Issue - Agricultural Land Loss / Environmental Impact

- Concerns about harm to local wildlife - light, noise, and visual pollution affecting rural environment
- Site is prime agricultural (BMV) land; development would reduce food-producing land.
- Loss of greenfield land when brownfield alternatives (e.g.,Llandow) exist.

Council Response

An ecological appraisal has been undertaken by the site promoter which covers the area allocated and extends to include the larger candidate site initial submitted to the Council

(site reference CS 453). The survey identifies that the site is dominated by intensively grazed, species-poor grassland of limited ecological value, with the principal ecological features comprising boundary hedgerows, treelines and scattered mature trees which provide habitat connectivity and potential for protected species, particularly bats and breeding birds. The appraisal notes that no statutory or non-statutory ecological designations are present on or immediately adjacent to the site, and no evidence of significant protected species constraints was recorded. The appraisal recommends a number of mitigation measures, including the retention and protection of higher-value boundary features, appropriate construction controls, updated pre-commencement checks, and the implementation of recommended mitigation, enhancement and long-term management.

The Council shall require updated ecological survey work to be undertaken at the planning application stage; this would highlight any mitigation measures required and identify potential measures for net biodiversity benefit as required by national and local planning policy.

In relation to the concerns raised over the loss of productive agricultural land, an agricultural land assessment has been undertaken for the site and summarised in Background Paper 23A Best and Most Versatile Agricultural Land. The ALC assessment indicates that the predictive ALC map for the area identifies the potential for 0.03 hectares of the site to be Grade 2 and 0.17 ha Grade 3a, equating to 0.2 Ha. This is 20% of the total site area which is considered negligible due to the limited ability to exploit this area for agricultural purposes.

With regard to concerns over light pollution noise and visual pollution- the submitted ecological appraisal recommends the use of sensitive lighting design to avoid light spill, whilst the Deposit RLDP Policy DNP7 Dark Skies considers matters relating to light pollution. Additionally, the Deposit RLDP contains a suite of policies specifically designed to protect residential amenity and environmental pollution, namely PDG1 Creating Well Designed and Inclusive Places and DNP5- Environmental Protection. Any future planning application for the site would be considered against the RLDP and update survey evidence required by the Council.

Issue - Scale of Development / Overdevelopment

- Village has already grown substantially (Heol Cae Pwll added 64 homes).
- Further 25 homes equals an approximately 57% population increase in 10 years, which is considered to be disproportionate.
- Development exceeds demonstrated housing need for the village.
- The proposal appears inconsistent with the principles of sustainable development set out in Planning Policy Wales, which requires development to be located in sustainable locations.

Council Response

The RLDP Strategic Policy SP1 sets out the spatial strategy for the plan and hierarchy of settlements where future development is considered. Highlighting that the majority of future housing would be directed to the largest Key, Service and Primary settlements which are served by good public transport links and offer a range of services and facilities. Outside this growth area, the majority of settlements are located within rural areas, which the Council recognise as having an important role both economically and socially for the residents of the area, which the Council wishes to support through the plan by allowing some small-scale developments in appropriate locations.

In this regard Colwinston is identified as a one of the minor settlements within the rural vale where small scale development is considered appropriate due to the presence of a primary school with then village, which is considered as a key service serving Colwinston and the wider locality.

The Council's latest Local Housing Market Assessment 2023 (Background Paper 10B) identifies an affordable housing need within the ward of Llandow of 50 units, whilst the Council's housing waiting list (Feb 2026) indicated that there were 27 individuals registered for Llandow Ward. The provision of small-scale affordable housing led development as proposed through the allocation at Colwinston alongside market housing would aid in meeting these targets, especially as there would be a local lettings policy to ensure that the affordable units are available to residents with a local connection at both initial and subsequent occupations.

In response to representations regarding the proposals being contrary to Planning Policy Wales (PPW), national policy recognises the need for local planning authorities to plan for rural areas. In relation to housing, PPW section 3.60 Development in the countryside indicates that such development should be located within and adjoining settlements where it can be 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.

The RLDP strategy reflects national planning, in that it directs the majority of growth to the largest settlements within the Vale of Glamorgan, whilst enabling small scale development within the smaller rural locations specifically where this would address an identified affordable housing need or support the rural economy. In this regard the allocation has been identified specifically as an affordable housing led site as a means of contributing to the idented affordable housing needs. Initial heritage, landscape and ecological assessments undertaken for the proposals have highlighted that appropriate mitigation measure can be implemented to avoid negative impacts on the features identified, whilst access and supporting infrastructure has also been considered as being available and appropriate to the scale of development proposed

The affordable housing led Policy HG4 of the RLDP also requires the market housing element to be of a size and type that reflects local demand, offering opportunities for accessing smaller market homes. This may assist first-time buyers and enable older residents to

downsize to more manageable properties within their local area, which in turn supports the long-term viability of rural communities and their economies. Within the RLDP, Colwinston is considered by the Council as being appropriate settlement for accommodating small scale affordable housing led development due to the availability of a primary school which is a key rural service for both immediate and surrounding areas.

Issue - Previous Assessments Showed the Site Was Unsuitable

- Site was rejected in earlier LDP stages for multiple reasons still relevant.
- No new justification provided to override previous unsuitability.

Council Response

The initial candidate site submitted to the Council during the candidate site call consisted of a larger site and proposed a minimum 65 dwellings (candidate site reference 453) and was promoted for market housing. This larger site was discounted from further consideration by the Council following its assessment of the site against the RLDP candidate sites assessment methodology. The assessment considered that the candidate site would "represent unacceptable intrusion into the open countryside, …and the scale of the proposal would be greater than that supported by the preferred growth strategy of the Replacement LDP" (Background Paper BP 18A page 73).

The smaller site which is now allocated under HG4.1 in the Deposit RLDP was submitted during consultation on the RLDP Preferred Strategy as an affordable housing led site for 25 dwellings (candidate site CS 4069). Following assessment of the site it was considered that the reduced scale and the proposal for the site to be affordable led would better accord with the existing pattern of development in Colwinston and would be acceptable in terms of the strategy.

Issue - Previous Assessments Showed the Site Was Unsuitable

- Several existing houses in the village already on the market with slow sales.
- Concerns developers may not deliver the required affordable housing percentage based on past behaviour.
- 50% affordable housing and 50% market housing proposed is contrary to existing LDP exceptions policies.
- A Development Viability Model has not been submitted.

Council Response

Land East of Colwinston has been allocated for the purposes of assisting in meeting both affordable and local market housing needs. Policy HG4 stipulates that the site identified under the policy will be required to provide as a minimum 50% affordable housing, and the delivery of these has been the subject of viability testing to illustrate that the levels of affordable housing required are achievable. Summaries of the viability appraisals of the affordable housing sites allocated under Policy HG4 are provided at Appendix 8 of Background Paper 42 Viability Assessment. It is incorrect to state that a Development

Viability Model has not been submitted, as the candidate site was supported by this information.

The identification of affordable housing led allocations has been introduced through the Deposit RLDP has a means of supporting the provision of affordable and market housing within rural areas in respect to local need.

Housing allocations are based on identified housing needs over the plan period rather than current market conditions. The presence of existing properties for sale does not demonstrate that there is no need for additional housing, particularly where new development can provide a range of house types and tenures to meet different needs.

Issue - Alternative sites

- Alternative preferable sites available within Colwinston should be reconsidered.
- Consideration of brownfield sites- ie Llandow.

Council Response

With regard to alternative sites located within the village, the Council has assessed all the sites submitted as candidate sites with Colwinston and deemed these sites to be unsuitable for development due to site constraints or other limiting factors. A summary of these assessments and the justification for their exclusion is provided with background paper BP18A Candidate Sites Assessment at Deposit Plan.

In respect of Llandow – this site submitted as a candidate site (reference CS 448) was discounted by the Council as it was being promoted for development of a new settlement in a location contrary to the adopted strategy for the plan. Additional, national planning policy stipulates that proposals for new settlements should be considered within either a joint local development or strategic development plans to their significance and impacts extending beyond a single local authority (Planning Policy Wales, Edition 12 para. 3.53)

Council Overall Response

Following detailed review of the representations submitted in relation to Site HG 4.1 Land East of Colwinston, the Council acknowledges the breadth of concerns raised, including infrastructure capacity, transport impacts, environmental and heritage constraints, amenity considerations raised within the representations.

Infrastructure delivery and appropriate mitigation will be essential to ensure that the development comes forward in a coordinated and responsible manner, and these matters have been considered in the allocation of the site. Further mitigation details will be required at the planning application stage and controlled by appropriate planning conditions.

Therefore, the Council considers that the allocation of Site HG4.1 remains sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

HG4.2 LAND WEST OF MAENDY ROAD, ABERTHIN

Representation ID	Respondent Name	Representation Type
4473	Mr and Mrs JL and GP Jones [2804]	Support
4474	Mr and Mrs JL and GP Jones [2804]	Comment
4531	Triangle Property Holdings [3757]	Support
5253	Mr Gary Rees [3194]	Object
5304	Dr Kate Watts [3225]	Object
5318	Mrs G Tasker [3230]	Object
5322	Ms Elizabeth Jenkins [3233]	Object
5343	Mr David Metcalf [3234]	Object
5345	Mr David Metcalf [3234]	Object
5352	Miss Jillian Arnold [3240]	Object
5397	Mrs Alexandra Jenkins [2454]	Object
5416	Mr Matt Hussain [3250]	Object
5417	Ms Jenny Hughes [3251]	Object
5420	Professor Stephen Jolles [3252]	Object
5421	Mrs Linda Edwards [3253]	Object
5441	Mrs Mary Woods [3256]	Object
5458	Ms R Williams [3265]	Object
5499	Ms Kate Davies [3274]	Object
5509	S Coleman [3276]	Object
5562	Mr Esther Fines [3294]	Object
5563	Mrs Yvonne Owens [3297]	Object
5595	Ms Anne Llion [3304]	Object
5597	Mr Simon Dillon [2727]	Object
5611	Cowbridge with Llanblethian Town Council (N Alexander, Chief Officer) [2545]	Object
5615	Mr Scott alford [3311]	Object
5621	Mr Kevin Adams [3315]	Object
5622	Mrs Rhian Adams [3316]	Object
5624	Mrs Liz George [3293]	Object
5657	Mr Tudor Williams [2734]	Object
5700	Mrs Fran Winterbottom [3339]	Object
5734	Mrs susan edwards [3222]	Object
5742	Mrs Stephanie Dillon [3338]	Object
5766	Mrs Lyn Rees [3220]	Object
5776	Keith Harrap Edwards [3366]	Object
5796	Mrs Rishmal Mitten [3376]	Object
5805	Mr Nicholas Paine [3379]	Object
5809	Mrs Jackie Lightfoot-Paine [3381]	Object
5821	Jemma MacLean [3387]	Object
5835	Mrs Elizabeth Curtis [3393]	Object
5836	Miss Abigail Pearce [3394]	Object
5837	Mrs Christine Nicholls [3395]	Object
5850	Mr Kevin Birrane [3400]	Object
5870	Mrs Debbie Jones [3405]	Object
5964	Mrs susan edwards [3222]	Object
6019	Mr Laurie S Golden [3456]	Object
6046	Mrs Susannah Thomas [3454]	Object

6153	Mr Michael Speirs [3483]	Object
6155	Ms Kelly Morton [3484]	Object
6184	Mr Will Jones [3489]	Object
6212	The Mindful Architech Ltd (Ms R Ovett) [3497]	Object
6244	Mrs Christine Williams [3502]	Object
6265	Mr Gary Rees [3505]	Object
6268	Mrs Lyn Rees [3220]	Object
6271	Mr Tim Jenkins [3507]	Object
6272	Kim Jenkins [3508]	Object
6273	Brigitte Miller [3509]	Object
6274	Miles Jenkins [3510]	Object
6275	Jane Sanders [3511]	Object
6276	Barrie White [3512]	Object
6277	Ann White [3513]	Object
6278	Janette Williams [3514]	Object
6279	Ian Howells [3515]	Object
6280	Rachel Howells [3516]	Object
6281	Rachel Jones [3517]	Object
6282	Derwyn Jones [3518]	Object
6312	Miss Camilla Hopkin [3538]	Object
6315	Mr Lewis Jones [3539]	Object
6343	Mr & Mrs Ralph & Maureen Fevre [3548]	Object
6380	Mr & Mrs Anthony & Wendy Wood [3564]	Object
6382	Mrs Fran Winterbottom [3339]	Object
6384	Mr andrew Gay [3224]	Object
6385	Mr Ian Price [3567]	Object
6401	Mrs Barbara Gay [3571]	Object
6406	Mr Simon Dillon [2727]	Object
6459	Mr Mike O'Brien [3329]	Object
6726	Councillor Charles Champion [1020]	Object
6990	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7054	Marion morgan [2413]	Object
7156	Peter Stone Properties Ltd [1182]	Object
7177	Wig Fach Property Company Ltd [2373]	Object
7223	Ms Megan Howells [3744]	Object
7224	Mrs Kate Howells [3745]	Object

A total of 82 representations were submitted in respect of the Rural Affordable Housing Site 2 – Land west of Maendy Road. Two representations were in support of the proposal, and the remainder were comments or objections.

In addition, an e-petition was submitted with 103 signatures. Some signatories of the petition also submitted individual representations on the site.

Several respondents made representations on the candidate site (2299) rather than the allocation. As these object to the principle of the housing allocation, these are dealt with under this response.

The statutory consultee response from DCWW has been addressed first. As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

The key issues raised were regarding the publicity of the consultation, green infrastructure, size and density of development, previous planning history, sustainability of location, settlement boundary, needs and requirements for affordable and market housing, conformity with policy and the justification for the site. Concerns were also raised about viability, the site assessment process, infrastructure capacity (education and health), highways issues, active travel and transport, flooding and drainage, loss of green space, greenfield development, alternative sites, biodiversity and landscape impact. Furthermore, representations also referenced impact on a public right of way, village character and the community.

STATUTORY CONSULTEE RESPONSE

6990 - Dwr Cymru Welsh Water - Comment

Water Supply - The water network can supply the proposed development. Wastewater - The public sewerage network can accept potential foul flows from this development site. Wastewater Treatment Works - Cowbridge WwTW has capacity to accept foul flows from the proposed development.

Council Response

The comments are noted. This is noted in Appendix 2 Infrastructure Delivery Plan and BP44.

INDIVIDUAL RESPONSES

4531 – Triangle Property Holdings (Mango Planning) - Support

On behalf of the proposer, I write to confirm that we support the application of Land west of Maendy Road, Aberthin under Policy HG4(2).

Council Response

Support is noted.

5611 – Cowbridge with Llanblethian Town Council

Cowbridge with Llanblethian Town Council opposes this scheme. Concerns are held regarding access to the site. The footpath is not wide enough. Exiting the site onto the sharp corner is dangerous. The number of houses proposed in the site is significant in relation to

the size of Aberthin, totalling approximately a 10% increase. Aberthin is a Minor Rural Settlement, not a Strategic Growth Area. Policy HG4 requires development in rural settlements to be small-scale and proportionate. The proposals would result in outward expansion, not minor infill. There is concern that this site is partially within Flood Zones 2 and 3.

Questions brought to Cowbridge Town Council in February 2026, for response by the Vale of Glamorgan Council are:

1. What material change has occurred since the previous rejection that now makes this site related to the settlement?
2. How is a 10% single-step expansion proportionate for a Minor Rural Settlement?
3. Why is rural greenfield expansion required when Cowbridge is already delivering substantial growth as a Service Centre?
4. Where are the sustainable transport and infrastructure measure that align this site with the Plan's spatial strategy?
5. How has the Council demonstrated that the site is genuinely deliverable while still providing the mandatory 50% affordable housing? An allocation does not automatically transform open countryside into settlement. It must be justified, proportionate, sustainable and deliverable, which has not been demonstrated with evidence.

Council Response

The concerns raised in the first part of the representation are addressed as part of the composite below. With regard to the individual questions posed, responses are provided below.

The allocation in Aberthin was previously submitted in 2005 when the Council was preparing the current adopted LDP to be considered for residential use. The assessment of the site, stated in the background paper that was published as part of the adopted LDP in 2013, was as follows:

'The candidate site is unrelated to the settlement of Aberthin and would represent unacceptable sporadic development in the countryside.'

At the time of this assessment, the LDP strategy against which the site was considered differed from the current RLDP strategy, as did the policy framework used to assess sites. The RLDP proposes a new policy for identifying small-scale, affordable housing-led sites (HG4) to address local rural housing needs, and it is within that context that the site has been assessed.

The RLDP Strategic Policy SP1 sets out the spatial strategy for the plan and hierarchy of settlements where future development is considered. This sets out that the majority of

future housing would be directed to the largest Key, Service and Primary settlements which are served by good public transport links and offer a range of services and facilities. Outside this strategic growth area, the majority of settlements are located within rural areas, which the Council recognise as having an important role both economically and socially for the residents of the area. The Plan seeks to support these areas by allowing for some small-scale developments in appropriate locations.

For the purposes of the RLDP Policy SP2, small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of up to 25 dwellings in Minor Rural Settlements or up to 50 dwellings in Primary Settlements. Therefore, the site is considered to be compliant with this policy and can be reasonably be regarded as small-scale development in this context. The Council does not consider that an increase of approximately 10% in the number of dwellings within the settlement is excessive in principle, and it is considered to be proportionate to the existing settlement. In percentage terms, growth levels can appear significant but in numerical terms, only 25 dwellings are proposed. It should be noted that the adopted LDP, which covers the plan period 2011-2026 allocated a site of 20 dwellings at Court Close in Aberthin. This site was completed in 2019. The allocation of a further site of a similar scale (25 dwellings) for the next plan period (2021-2036) is considered appropriate in scale for Aberthin.

The Council's latest Local Housing Market Assessment 2023 (Background Paper 10B) identifies an affordable housing need within the ward of Cowbridge (including Aberthin), of 230 units, whilst the Council's housing waiting list (February 2026) indicated that there were 367 households registered for the Cowbridge ward. The provision of small-scale affordable housing led development as proposed through the allocation at Aberthin alongside market housing would assist in meeting these targets, especially as there would be a local lettings policy to ensure that the affordable units are available to residents with a local connection at both initial and subsequent occupations.

It is acknowledged that there have been affordable housing developments in the area in the last plan period such as the development of 20 dwellings in Court Close, Aberthin which included an element of S106 affordable housing. Furthermore, provision has been made for several sites which will deliver new homes, including elements of affordable housing, in the Cowbridge area. Sites are currently under construction at the Former Cowbridge Grammar School, the Former Cowbridge Police station and at Clare Gardens (Darren Farm) – a significant site being developed across several phases. In addition, another site is allocated at St Athan Road for over 100 dwellings. However, even after this affordable housing provision has been delivered, there remains a significant need within the ward, and the provision of further affordable housing is justified.

In relation to concerns regarding greenfield development, a key component of the RLDP Strategy is "Allowing for regeneration opportunities on previously developed and underutilised land." The Adopted LDP has been successful in terms of bringing forward

redevelopment of brownfield land, such as that at Barry Waterfront. The RLDP seeks to prioritise brownfield opportunities over greenfield sites wherever possible and many brownfield sites in the Barry area are allocated for housing (including at Neptune Road, Hayes Lane and Pencoedtre School). However, even with these allocations, there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth over the plan period and therefore greenfield land will also therefore need to be released.

It is essential for the RLDP to balance growth in a way that supports the needs of rural communities with the wider sustainability objectives of the Plan. Consequently, RLDP Policy SP2 identifies those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment. Under this policy, Aberthin is identified as a minor rural settlement.

Aberthin is identified as one of the minor rural settlements where small scale development is considered appropriate due to the presence of a primary and secondary school as well as further services and facilities in Cowbridge that are within walking distance of the site and which can serve Aberthin and the wider locality.

Although concerns are noted, the Council does not consider that the proposed allocation would create a gateway for unsuitable housing development on greenfield sites. As set out in the Council's response to comments in respect of sustainability and affordable housing need, the site is considered to be suitable and justified in accordance with the RLDP's spatial strategy and settlement hierarchy. In terms of the RLDP's role in protecting greenfield land, under Policy SP3, areas outside the settlement boundaries that are not allocated or protected for a specific use will be defined as countryside. Policy SP3 sets out the policy framework for the management of development within the countryside and provides a balance between safeguarding and protecting the intrinsic character of the rural Vale, whilst enabling new development that is deemed appropriate for a rural location.

It is accepted that transport opportunities in Aberthin are more limited when compared to larger settlements within the Vale of Glamorgan. Notwithstanding this, the site is within walking distance of a number of key local amenities, including Cowbridge School and Aberthin Village Hall.

A Transport Note has been prepared to assess the transport-related matters associated with the proposed site allocation. The assessment examines not only the local highway network but also active travel connections and public transport services.

Whilst public transport options are limited, they are not entirely absent. Currently, the 321 service operates along the B4270 and A4222, which provides connections between Llantwit Major Interchange, Cowbridge and Talbot Green. The comments regarding the safety of the bus stops are noted. Whilst the southbound stop, located approximately 200m south of the proposed access, operates as an informal hail-and-ride service, the northbound stop,

situated approximately 100m south of the proposed access, is equipped with a traditional brick-built shelter and is considered to provide a safe waiting area for passengers.

In addition, the Council is tendering for 3 additional rural Vale bus services. This is likely to include a service between Llantwit Major and Bridgend as well as another between Cowbridge and Barry which will serve Cowbridge, providing at least 4 services per day in each direction. The existing 321 service connects Aberthin with Cowbridge, enabling Aberthin residents to access these services.

The Council also operates the Greenlinks Community Transport scheme, which provides demand-responsive transport across the rural Vale of Glamorgan. Greenlinks offers a practical and affordable solution for residents who may have difficulty accessing essential services and amenities. The scheme operates a fleet of accessible minibuses and cars which can be booked.

In respect of active travel, pedestrian access will be provided via the existing footway along the western side of Maendy Road. In addition, a pedestrian/cycle connection will be made to the existing PROW that runs along the western boundary of the site. The existing c.2.0m wide footway that runs along the northern side of Maendy Road connects the site with Cowbridge Comprehensive School in a westerly direction, approximately 650m away. Cowbridge town centre, which lies approximately 1.7km to the south west, can also be reached via the existing footway network in approximately 23 minutes.

Access to local services and facilities within walking distance is considered to reduce reliance on private vehicle travel. In addition, the Transport Note considers that the proposed density is likely to give rise to a minimal volume of additional vehicle trips.

Furthermore, the Active Travel Network Map identifies a future walking and cycling route between Cowbridge and Ystradowen (referenced Future 017A), which, depending on the preferred route option, would either pass directly through Aberthin, or follow an old railway line in close proximity to the village. Welsh Government Active Travel funding was received in September 2021 to look at active travel route options between Cowbridge and Ystradowen. A consultation was held in June 2022 which sought the views of residents on potential route options. Due to funding and objections, the scheme has not progressed beyond concept design stage.

A contribution toward improving Sustainable Transport will be a requirement of a future planning permission being granted, as set out in Appendix 2 of the Plan.

It is acknowledged that Aberthin is not as sustainable as larger settlements in the Vale. It does not have as extensive a range of services, and sustainable linkages are acknowledged to not be as strong as within the larger settlements. Consequently it would not be appropriate to direct significant and strategic allocations to this location. However, the size and nature of the proposed allocation is reflective of critical affordable housing need in the Vale, and

identified Housing need locally. It is considered that the size of proposed allocation represents an appropriate balance between housing need, and the sustainability of the location which, as noted above, is served by a number of important services.

The candidate site submission was supported by a viability assessment prepared using a Development Viability Model (DVM). The DVM has been reviewed by the Council, and it has been demonstrated that the site can delivered 50% affordable housing, as required by Policy HG4. The outputs of the viability assessment are summarised in Appendix 8 of BP42 Viability Assessment.

7054 – Marion Morgan (Geraint John Planning) - Object
7156 – Peter Stone Properties Ltd (Geraint John Planning) – Object
7177 – Wig Fach Property Company Ltd (Geraint John Planning) - Object
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."

Council Response

To provide context, it should be noted that the site was first submitted as part of the second call for candidate sites that took place during the consultation on the RLDP Preferred Strategy, between December 2023 and February 2024. The purpose of the Preferred Strategy was to set out the proposed strategic direction that the Council would take in managing development within the Vale of Glamorgan up to 2036, identifying the Council's vision, strategic objectives, and broad spatial strategy. It was not the final RLDP and as such it did not include all the policies, land use proposals or infrastructure. This detail was included in the Deposit RLDP, which set out further specific land allocations, including four rural affordable housing-led allocations. While the Council acknowledges concerns regarding the candidate site process and transparency, as the site in Aberthin was first submitted during the second call for sites, the first formal opportunity for stakeholders and residents to comment on its proposed allocation was during the Deposit RLDP consultation that took place between January 2026 and March 2026.

All allocations that were submitted during the second call for sites were appraised through the candidate site assessment process before being allocated within the RLDP. The process on which sites have been appraised can be found within BP16 Candidate Site Assessment Methodology. All sites submitted were measured alongside 6 sections, which can be found within BP16, and scored through a Green, Amber, Red system, to assess the sites' suitability. It must be noted that the process of appraising sites is not completely quantitative. When appraising sites officers have used their professional judgement alongside key information to give what they feel is the appropriate result in terms of satisfaction of the relevant criterion.

The assessment concluded that:

"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 site has been allocated as an affordable housing led site HG4 (2)."

Additionally, 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. Therefore, the site is considered suitable for allocation in principle, subject to the built development avoiding the small area of flood risk located in the southernmost extent of the site. A viability assessment has also been submitted which demonstrates that the site is deliverable as an affordable housing led site.

A summary of the site's assessment is available at Appendix 1 of BP18A 'Candidate Site Assessment at Deposit Plan stage' which was published for public view and comment as part of the Deposit Plan consultation.

The allocation is therefore considered to be sound.

COMPOSITE RESPONSE

SUPPORT

- Field should be developed as we need affordable housing in the village.

Council Response

Support is noted.

OBJECTION/COMMENT

Issue – Notice of Consultation

- Why wasn't the official notice board at the bus stop used for the site notice?
- Have you notified the Village Hall committee of these plans?
- Have you notified the Village Hall regarding the RLDP meeting in Cowbridge Town Hall?
- Why was a meeting not held in the Village Hall where you would be able to answer our concerns.
- Only recently became aware of this proposal although the plan has been in preparation for over 2 years.

Council Response

The Council would advise that the RLDP has been prepared in accordance with the requirements of the Development Plans Manual (Edition 3) (March 2020) (DPM) which reflects the context of current national policy as contained with Planning Policy Wales (Edition 12) (February 2024) and current legislation including the Planning and Compulsory Purchase Act 2004, the Planning (Wales) Act 2015 and associated Regulations (The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended 2015)) and statutory consultation requirements.

Formal notification of the Deposit RLDP consultation was issued to all individuals and organisations listed on the LDP Consultation Database, including those who had requested to be kept informed of RLDP progress. Notifications were sent by letter or email in accordance with the recipients stated preference. In total, nearly 2,000 representors were contacted and provided with information on the consultation, guidance on how to access the relevant documents and submit representations as well as details of the public engagement sessions.

Unless an organisation or group, such as the Village Hall Committee, were listed as a consultation body within the Delivery Agreement (DA) (Revised December 2025) or registered to receive RLDP updates, they would not have been notified directly by the Council. However, the Town and Community Councils, elected members and the Public Services Board (PSB) were all contacted directly and were asked to share details of the consultation with their communities and networks. Should the Village Hall Committee wish to receive future RLDP updates directly, they can register for notifications via the Council's website.

Additionally, in terms of local advertisement, posters were displayed advertising the consultation in the Council run libraries and consultation venues. These posters included a QR code which could be scanned to take users directly to the consultation page of the website and set out the dates, times and locations of the consultation events. Copies of a leaflet were also available in local libraries detailing the key points of the consultation and how people could have their say.

A site notice was placed on the utility pole next to the bus stop shelter, opposite the Hare & Hounds, which showed a map locating the site, detailed the proposed use and featured the QR code that linked directly to the consultation page of the website. This was carried out in accordance with the procedures set out in the DA, with site notices displayed around all housing and employment sites identified within the RLDP. It is standard planning practice to place site notices at a visible location within close proximity of the proposed development.

Public consultation events were held in key settlements where proposed development is focused within the RLDP, as well as at locations that were accessible to residents from across the Vale of Glamorgan. A consultation event was held at Cowbridge Town Hall on 10 February 2026, providing an opportunity for residents to discuss and raise concerns about proposals within Cowbridge and the surrounding area, including Aberthin. However, all consultation events were open to the public and were not restricted to residents of a particular settlement or limited to discussion around particular proposals or policies. Residents of Aberthin were therefore able to attend the Cowbridge event, as well as any of the other six consultation sessions held across the Vale. Indeed, issues relating to Aberthin were raised and discussed during the Cowbridge session.

The site was submitted as part of the second call for candidate sites that took place during the consultation on the RLDP Preferred Strategy, between December 2023 and February 2024. The purpose of the Preferred Strategy was to set out the proposed strategic direction that the Council would take in managing development within the Vale of Glamorgan up to 2036, identifying the Council's vision, strategic objectives, and broad spatial strategy. It was not the final RLDP and as such it did not include all the policies, land use proposals or infrastructure. This detail was included in the Deposit RLDP, which set out further specific land allocations, including four rural affordable housing-led allocations. As the site in Aberthin was first submitted during the 2nd call for sites, the first opportunity to comment on the allocation was during the Deposit consultation that took place between January 2026 and March 2026.

Issue – Green Infrastructure

- It would be good to include a small village green against the plan.

Council Response

Whilst indicative, the concept masterplan identifies significant areas of public open space located near the site entrance and throughout the central area of the site.

Issue – Size/Density of Development

- It seems strange to outline 25 dwellings on such a large area, or are there more plans in mind?
- Would represent around a 14% expansion of the settlement in a single development.
- Cannot be reasonably regarded as small-scale development.
- Risks over-development in a rural area.
- Developer would need to build 2-storey houses to fit 25 on the site which would depart from the historic nature of the village.

- If development were to follow the established pattern of single-storey dwellings, the density on site would likely be lower than the 25 dwellings assumed in the allocation.
- Density and substantial increase in dwellings.
- Are the 25 dwellings flats or houses?

Council Response

The RLDP Strategic Policy SP1 sets out the spatial strategy for the plan and hierarchy of settlements where future development is considered. This sets out that the majority of future housing would be directed to the largest Key, Service and Primary settlements which are served by good public transport links and offer a range of services and facilities. Outside this strategic growth area, the majority of settlements are located within rural areas, which the Council recognise as having an important role both economically and socially for the residents of the area. The Plan seeks to support these areas by allowing for some small-scale developments in appropriate locations.

Although the Council notes concerns of over-development, it is essential for the RLDP to balance growth in a way that supports the needs of rural communities with the wider sustainability objectives of the Plan. Consequently, RLDP Policy SP2 identifies those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment. Under this policy, Aberthin is identified as a minor rural settlement.

Although Aberthin itself has a more limited range services and facilities, it 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. Additionally, the site is located within walking distance of two pubs and Aberthin Village Hall. In this regard, Aberthin is identified as one of the minor rural settlements where small scale development is considered appropriate due to the presence of a primary and secondary school as well as further services and facilities in Cowbridge that are within walking distance of the site and which can serve Aberthin and the wider locality.

For the purposes of the RLDP Policy SP2, small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of up to 25 dwellings in Minor Rural Settlements or up to 50 dwellings in Primary Settlements. Therefore, the site is considered to be compliant with this policy and can be reasonably be regarded as small-scale development in this context.

Although the exact type, tenure and mix of dwellings will be determined at planning application stage, a concept masterplan has been provided for the site. The layout is informed by affordable housing need data, which indicates a need for smaller affordable

housing units (1 bed walk up apartments and 2 and 3 bed houses) but is also likely to provide an element of market housing.

RLDP Policy HG4 also requires that, on each of the Rural Affordable Housing Led Sites, applicants to demonstrate how both the market and affordable housing provides for the local housing needs of community in terms of tenure, type and size of dwellings so that a range of housing is delivered to meet the needs of different groups in the local community. It is anticipated that the dwelling types and sizes will be in keeping with the types of development within the settlement.

The Council acknowledges concerns regarding the proposed density. Policy MD6 in the adopted LDP states that in minor rural settlements, a minimum net residential density of 25 dwellings per net hectare will be required. In the proposed RLDP Policy PGD2, minor rural settlement will be required to meet a minimum residential density of 30 dwellings per net hectare.

Net developable area includes only those areas which will be developed for housing and directly associated uses such as access roads within the site, private garden space, car parking areas, incidental open space and landscaping, and children's play areas where these are to be provided. Therefore, it excludes significant areas of open space and sustainable drainage features such as attenuation basins.

The site's supporting information suggests that the site will deliver the minimum threshold of units set out in both LDP Policy MD6 and RLDP Policy PGD2 at a density in excess of 30 dwellings per hectare. However, as stated above, the exact layout and density will be determined at planning application stage.

Issue – Planning History

- Previously rejected for development.
- Previous LDP considered it was unrelated to the settlement and would constitute sporadic development in the countryside.
- No material change in circumstances has been demonstrated to justify a different conclusion.

Council Response

The allocation in Aberthin was previously submitted in 2005 when the Council was preparing the current adopted LDP to be considered for residential use. The assessment of the site, stated in the background paper that was published as part of the adopted LDP in 2013, was as follows:

'The candidate site is unrelated to the settlement of Aberthin and would represent unacceptable sporadic development in the countryside.'

At the time of this assessment, the LDP strategy against which the site was considered differed from the current RLDP strategy, as did the policy framework used to assess sites. The RLDP proposes a new policy for identifying small-scale, affordable housing-led sites (HG4) to address local rural housing needs. On this basis, the Council considers that this site would be suitable.

Issue – Sustainability of Location

- Conflicts with the Plan's Sustainable Growth Strategy.
- Extension into open countryside which is contrary to the principles of sustainable and plan-led development.
- Aberthin is classified as a Minor Rural Settlement, not a sustainable growth growth location.
- Inconsistent with the role of such settlements within the hierarchy.
- RLDP states that development should be focussed on the Strategic Growth Area and Service Centres.
- Totally unsuitable location for housing.
- Poor employment and transport links.
- Lack of necessary employment.

Council Response

The RLDP Strategic Policy SP1 sets out the spatial strategy for the plan and hierarchy of settlements where future development is considered. This sets out that the majority of future housing would be directed to the largest Key, Service and Primary settlements which are served by good public transport links and offer a range of services and facilities. Outside this strategic growth area, the majority of settlements are located within rural areas, which the Council recognise as having an important role both economically and socially for the residents of the area. The Plan seeks to support these areas by allowing for some small-scale developments in appropriate locations.

Although concerns of sustainability are acknowledged, it is essential for the RLDP to balance growth in a way that supports the needs of rural communities with the wider sustainability objectives of the Plan. Consequently, RLDP Policy SP2 identifies those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment. Under this policy, Aberthin is identified as a minor rural settlement.

Although Aberthin itself has a more limited range of services and facilities, it 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. Additionally, the site is located within walking distance of two pubs and Aberthin Village Hall. In this regard, Aberthin is

identified as one of the minor rural settlements where small scale development is considered appropriate due to the presence of a primary and secondary school as well as further services and facilities in Cowbridge that are within walking distance of the site and which can serve Aberthin and the wider locality.

In line with national planning policy, the settlement boundary has been drawn around the village to identify the extent of built development which includes allocation HG4 (2). In terms of development into the open countryside, areas outside the settlement boundaries that are not allocated or protected for a specific use will be defined as countryside. RLDP Policy SP3 sets out the policy framework that provides the balance between safeguarding and protecting the intrinsic character of the rural Vale, whilst enabling new development that is deemed appropriate for a rural location.

Although the Council notes that the site is not located near any major or local employment sites, it is located within walking distance of Cowbridge which is identified as a town centre due to its large number and wide range of retail, leisure and services. Town centres offer a range of employment opportunities, and the proximity of town centres is a key consideration in the allocation of housing sites. Sites within walking and cycling distance of centres have been favoured where such sites are available, as this will facilitate more sustainable travel choices and provide access to a range of services including employment opportunities. Consequently and as noted above, in the context of the evidenced housing need, the site is considered acceptable in this location.

Comments relating to poor transport links are noted. Please refer to the Council's response to public transport and active travel concerns in respect of this site.

Issue – Settlement Boundary

- Site remains outside of the settlement boundary
- If already redrawn, reinstate the defensible boundary unless a published boundary review justifies change.

Council Response

It is established that the Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocations for affordable housing. Where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development. In line with national planning policy, settlement boundaries have subsequently been adjusted and redrawn where housing allocations have been proposed within the RLDP. All new allocations within the Deposit RLDP have been subject to the Council's site assessment and settlement boundaries subject to boundary review which is set out in BP46.

Therefore, it is considered that the boundary change is justified and should be retained.

Issue – Housing Growth/Need/Requirement

- Given the scale of planned growth in Cowbridge, further greenfield expansion in the Rural Vale is unnecessary.
- Disproportionate growth.
- Estate-scale growth.
- Constitutes urban sprawl.
- Not a minor infill but a clear and outward expansion.
- New houses in Cowbridge have taken years and are not selling.
- The plan has exceeded requirements for housing.
- Unnecessary for delivery of the Plan's housing strategy.
- Not required for the Plan to deliver its housing requirement.
- If removing this site and all other HG4 sites, the plan retains a surplus of dwellings.
- The necessity for site allocations should be clearly demonstrated.
- Housing supply is already being delivered in nearby settlements and surrounding area may already be at saturation point.
- Will turn a small village into an extension of Cowbridge.
- Additional housing in Court Close means there is no further need.
- RLDP is one delivery mechanism within a wider system, and this allocation risks over-provision.

Council Response

The Council's latest Local Housing Market Assessment 2023 (Background Paper 10B) identifies an affordable housing need within the ward of Cowbridge (including Aberthin), of 230 units, whilst the Council's housing waiting list (February 2026) indicated that there were 367 households registered for Cowbridge ward. The provision of small-scale affordable housing led development as proposed through the allocation at Aberthin alongside market housing would aid in meeting these targets, especially as there would be a local lettings policy to ensure that the affordable units are available to residents with a local connection at both initial and subsequent occupations.

It is acknowledged that there have been affordable housing developments in the area in the last plan period such as the development of 20 dwellings in Court Close, Aberthin which included an element of Section 106 affordable housing. Furthermore, provision has been made for several sites which will deliver new homes, including elements of affordable housing, in the Cowbridge area. Sites are currently under construction at the Former Cowbridge Grammar School, the Former Cowbridge Police station and at Clare Gardens (Darren Farm) – a significant site being developed across several phases. In addition, another

site is allocated at St Athan Road for over 100 dwellings. However, even after this affordable housing provision has been delivered, there remains a significant need within the ward, and the provision of further affordable housing is justified.

Regarding the delivery of new homes in Cowbridge, there is only one site in Cowbridge that is being delivered for market sales - Clare Gardens. However, housing delivery and sales have taken longer than anticipated due to the Council issued a Temporary Stop Notice on 31st May 2024 to prevent any further development on Phase 2, as the developer had not discharged drainage conditions on the relevant planning consents and due to concerns raised with the Council's Drainage Team regarding flooding on site. As a result, all works on Phase 2 of the development ceased in May 2024, until the relevant drainage conditions were discharged in November 2025. Delivery rates have therefore been low due to the Temporary Stop Notice, rather than as a result of market conditions.

The Council is required to prepare an Annual Monitoring Report (AMR) to demonstrate the extent to which the LDP strategy and objectives are being achieved and whether the Plan's policies are functioning affectively. This includes monitoring the delivery of general market and affordable housing throughout the plan period. This is prepared in accordance with a monitoring framework which includes a set of indicators and targets which are set against trigger points to indicate if one part of the Plan is not achieving the desired outcomes. In terms of housing delivery, the number of units delivered in the adopted LDP period is below what was required. It is therefore not the case that the plan has exceeded the requirements for housing.

A monitoring framework has also prepared and published for consultation within Appendix 3 of the Deposit Plan. Until the RLDP has been adopted, it is not possible to monitor the performance of the plan. However, annual housing completions will continue to form part of the future monitoring framework.

The RLDP housing growth strategy aims to deliver sufficient housing to meet the identified requirement over the plan period. It ensures an appropriate mix of general market housing, affordable homes, and specialist accommodation. Policy SP6 sets out a housing requirement of 7,890 dwellings over the plan period, equating to 526 units per annum. To ensure flexibility and support deliverability, the Plan includes a 10% over-allocation, making provision for a total of 8,660 dwellings. In their response to the Deposit Plan consultation, Welsh Government did not object to the level of growth proposed in the plan and supports the approach taken in respect of the flexibility allowance.

The headline figure of need in the LHMA, based on the 2018-based Welsh Government principal household projections, is 1,075 units per annum for the first five years of the LHMA period, followed by a further 154 units per annum. If calculated over a 15-year period, this equates to an average annual need of 461 units. The LHMA also includes variant projections. If the RLDP household projections are used instead of the 2018-based Welsh Government

projections, the identified need increases to 1,114 units per annum for the first five years, and 196 units per annum, thereafter, equating to an average of 502 units per annum over 15 years. To help address the need identified, Policy SP7 anticipates that the RLDP will contribute towards delivering a minimum of 3,070 affordable dwellings over the plan period.

The Council acknowledges that this target is indicative and relates only to those affordable homes secured through the planning system. The figure includes contributions from committed sites, additional affordable housing secured through Section 106 agreements from new allocations, including small scale affordable housing led sites, and from windfall and small sites. In calculating the affordable housing target, the Council also recognises that the number of affordable homes delivered during the plan period could be lower as a result of site viability constraints or greater where they are on sites delivered by the Council, Registered Social Landlords or on land owned by the Welsh Government.

Considering the above, the allocations in the plan are a measure of identified need across the Vale of Glamorgan area and are not considered to risk over-provision. In particular, this site would make a valuable contribution towards meeting the identified housing need in the ward, as demonstrated by the latest figures on the Council's Housing Waiting List (February 2026). It is therefore not considered that the site is 'unnecessary' in delivering the Plan's housing strategy.

In relation to concerns regarding greenfield development, a key component of the RLDP Strategy is "Allowing for regeneration opportunities on previously developed and underutilised land." The Adopted LDP has been successful in terms of bringing forward redevelopment of brownfield land, such as that at Barry Waterfront. The RLDP seeks to prioritise brownfield opportunities over greenfield sites wherever possible and many brownfield sites in the Barry area are allocated for housing (including at Neptune Road, Hayes Lane and Pencoedtre School). However, even with these allocations, there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth over the plan period and therefore greenfield land will also therefore need to be released.

It is not considered that the allocation of 25 dwellings, which would contribute towards addressing identified housing needs within the ward, would result in Aberthin becoming an extension of Cowbridge. The site forms a logical northern boundary to the village and would not lead to any further coalescence with Cowbridge to the west or over-provision within the area.

Issue – Affordable Housing

- Affordable housing need identified at a ward level rather than within Aberthin itself.
- No evidence has been presented demonstrating a local need within the settlement.
- The site makes a negligible contribution to affordable housing delivery.

- Not materially dependent on the site to deliver its affordable housing strategy.
- Affordable housing provision should not be used as a sole justification for development.
- The affordable housing figure identified in the plan (3,070) is a projection of delivery, not a measure of need and therefore is not a target that must be achieved through allocating specific individual sites.

Council Response

In accordance with the Local Housing Market Assessment (LHMA) methodology, affordable housing need is robustly assessed and judged at the ward level, rather than by individual settlement boundaries.

The Council's latest Local Housing Market Assessment 2023 (Background Paper 10B) identifies an affordable housing need within the ward of Cowbridge of 230 units, whilst the Council's housing waiting list (Feb 2026) indicated that there were 367 individuals registered for Cowbridge ward. Notably, 107 of these individuals are identified as having the highest level of need. The provision of small-scale affordable housing led development as proposed through the allocation at Aberthin alongside market housing would aid in meeting these targets, especially as there would be a local lettings policy to ensure that the affordable units are available to residents with a local connection at both initial and subsequent occupations.

It is acknowledged that there have been affordable housing developments in the area in the last plan period such as the development of 20 dwellings in Court Close, Aberthin which included an element of S106 affordable housing. Furthermore, provision has been made for several sites which will deliver new homes, including elements of affordable housing, in the Cowbridge area. Sites are currently under construction at the Former Cowbridge Grammar School, the Former Cowbridge Police station and at Clare Gardens (Darren Farm) – a significant site being developed across several phases. In addition, another site is allocated at St Athan Road for over 100 dwellings. However, even after this affordable housing provision has been delivered, there remains a significant need within the ward, and the provision of further affordable housing is justified.

The headline figure of need in the LHMA, based on the 2018-based Welsh Government principal household projections, is 1,075 units per annum for the first five years of the LHMA period, followed by a further 154 units per annum. If calculated over a 15-year period, this equates to an average annual need of 461 units. The LHMA also includes variant projections. If the RLDP household projections are used instead of the 2018-based Welsh Government projections, the identified need increases to 1,114 units per annum for the first five years, and 196 units per annum, thereafter, equating to an average of 502 units per annum over 15 years. To help address the need identified, Policy SP7 anticipates that RLDP will contribute

towards delivering a minimum of 3,070 affordable dwellings over the plan period. Therefore, the allocations in the plan are a measure of identified need in the area.

Considering the above, the allocations in the plan are a measure of identified need across the Vale of Glamorgan area and are not considered to risk over-provision. In particular, this site would make a valuable contribution towards meeting the identified housing need in the ward, as demonstrated by the latest figures on the Council's Housing Waiting List (February 2026). It is therefore considered that the site would play an important role in delivering the Plan's affordable housing strategy.

While the identified need for affordable housing is an important justification in the allocation of small-scale affordable housing-led sites, it is not the sole factor informing such allocations. It is essential for the RLDP to balance growth in a way that supports the needs of rural communities with the wider sustainability objectives of the Plan. Consequently, RLDP Policy SP2 identifies those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment. Under this policy, Aberthin is identified as a minor rural settlement.

Although Aberthin itself has limited services and facilities, 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. Additionally, the site is located within walking distance of two pubs and Aberthin Village Hall. In this regard, Aberthin is identified as one of the minor rural settlements where small scale development is considered appropriate due to the presence of a primary and secondary school as well as further services and facilities in Cowbridge that are within walking distance of the site and which can serve Aberthin and the wider locality.

Issue – Conflict with Local/National Policies and Goals

- Conflicts with RLDP Policy HG4 which requires development in rural settlements to be small-scale and proportionate.
- Inconsistent with national policy, including PPW (sustainable spatial strategy and protection of landscape) and TAN15 (flood risk).
- Conflicts with PPW and TAN6 that expect rural affordable housing to be genuinely locally justified.
- Conflicts with sustainable transport objectives.
- Promotes site-led planning which the Development Plans Manual warns against.
- RLDP Policy HG4 overrides the wider plan-making framework.
- Conflicts with settlement boundary policy.
- Conflicts with the adopted conservation area management guidance.

Council Response

The Council would advise that the RLDP has been prepared in accordance with the requirements of the Development Plans Manual (Edition 3) (March 2020) (DPM) which reflects the context of current national policy as contained with Planning Policy Wales (Edition 12) (February 2024).

In response to representations regarding the proposals being contrary to the Planning Policy Wales (PPW) and promoting site-led planning, national policy recognises the need for local planning authorities to plan for rural areas. In relation to housing, PPW section 3.60 Development in the countryside indicates that such development should be located within and adjoining settlements where it can be 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.

The Council's latest Local Housing Market Assessment 2023 (Background Paper 10B) identifies an affordable housing need within the ward of Cowbridge of 230 units, whilst the Council's housing waiting list (Feb 2026) indicated that there were 367 individuals registered for Cowbridge ward. Notably, 107 of these individuals are identified as having the highest level of need. The provision of small-scale affordable housing led development as proposed through the allocation at Aberthin alongside market housing would aid in meeting these targets, especially as there would be a local lettings policy to ensure that the affordable units are available to residents with a local connection at both initial and subsequent occupations. Therefore, it is not considered that the proposal conflicts with PPW and TAN6 as these figures demonstrate that it is genuinely locally justified.

It is essential for the RLDP to balance growth in a way that supports the needs of rural communities with the wider sustainability objectives of the Plan. Consequently, RLDP Policy SP2 identifies those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment. Under this policy, Aberthin is identified as a minor rural settlement.

Aberthin is identified as one of the minor rural settlements where small scale development is considered appropriate due to the presence of a primary and secondary school as well as further services and facilities in Cowbridge that are within walking distance of the site and which can serve Aberthin and the wider locality.

For the purposes of the RLDP Policy SP2, small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of up to 25 dwellings in Minor Rural Settlements or up to 50 dwellings in Primary Settlements. Therefore, the site is considered to be compliant with this policy and can be reasonably be regarded as small-scale development in this context.

The RLDP strategy reflects national planning, in that it directs the majority of growth to the largest settlements within the Vale of Glamorgan, whilst enabling small scale development within the smaller rural locations specifically where this would address an identified affordable housing need or support the rural economy. In this regard the allocation has been identified specifically as an affordable housing led site as a means of contributing to the idented affordable housing needs.

The representation from Welsh Government further concluded that the Deposit RLDP is in general conformity with Future Wales and specific policies within it. In particular, they support the policy approach 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 believe it is justified by the high level of affordable housing need evidence in the LHMA. It is therefore not considered that the HG4 allocations override the wider plan-making framework.

On the matter of sustainable transport objectives, please refer to the Council's response relating to active travel, public transport, and the sustainability of the location. Please also refer to the Council's response in respect of landscape and visual impacts, which includes specific consideration of comments relating to Conservation Area management.

It is established that the Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocations for affordable housing. Where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development. In line with national planning policy, settlement boundaries have subsequently been adjusted and redrawn where housing allocations have been proposed within the RLDP. All new allocations within the Deposit RLDP have been subject to the Council's site assessment and settlement boundaries subject to boundary review which is set out in BP46. As an allocated site, it is not considered that the proposal would conflict with RLDP Policy SSC1 Development within Settlement Boundaries.

Whilst concerns regarding compliance with TAN 15 is noted, please refer to the Council's response on Flood Risk and Drainage which addresses these concerns. However, in summary, the submitted flood risk and drainage strategy prepared by Vale Consultancy demonstrates that the majority of the site falls within Zone 1 (rivers) and the very southern tip within Zone 2 and 3 (rivers). It confirms that all highly vulnerable aspects of the proposal are directed towards Zone 1. It is concluded that fluvial flooding associated with Nant Aberthin presents a low and residual risk. The site is located in Zone 1 (Sea) and (surface water and small watercourses) and, as such, there is no risk. The proposal will not result in the increased risk of flooding elsewhere and is compliant fully with PPW and TAN15.

Issue – RLDP Evidence

- The site is not justified or supported by proportionate evidence.

- No evidence is provided to justify a settlement boundary change.
- Not demonstrated why this site is the most appropriate option.

Council Response

The Deposit Replacement Local Development Plan (RLDP) has been informed by an extensive evidence base and in accordance with national planning policy, including Future Wales: The National Plan 2040 and Planning Policy Wales, which inter alia, require local authorities to make provision for homes, employment land, renewable energy and decarbonisation initiatives over the plan period. The RLDP seeks to balance these requirements while protecting the Vale's extensive range of environmental assets and supporting sustainable placemaking.

In considering settlement boundaries, the Council has undertaken a review of the boundaries defined within the Adopted LDP to assess any changes that may have taken place around the periphery of settlements since their designation. Details of the methodology used to carry out this assessment are provided in Background Paper BP46. Additionally, it is established that the Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocations for affordable housing. Where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development. Settlement boundaries have subsequently been adjusted and redrawn where housing allocations have been proposed within the RLDP. All new allocations within the Deposit RLDP have been subject to the Council's site assessment and settlement boundaries subject to the boundary review set out in BP46. Therefore, settlement boundary changes are considered to be justified.

With regard to the assessment of appropriate options, the RLDP's housing allocations are guided by a sustainability framework, the local evidence base and the specific candidate site submissions received by the Council. The RLDP should only allocate sites that are demonstrated to be deliverable and the availability of sites, as demonstrated by a candidate site submission, is a key factor in deliverability. While the Council evaluates all potential rural settlements where sites have been submitted, allocations are directed to locations that demonstrate the highest balance of sustainability, accessibility, and infrastructural resilience, alongside local housing need and deliverability.

In terms of site-specific evidence, as part of the candidate site submission, a Concept Masterplan, Flood Consequences Assessment (FCA) & Drainage Strategy Report, Preliminary Ecological Appraisal, Topographical Survey, Transport Note, Proposed Access Arrangement, Development Viability Model, Viability Note, Cover Letter and a Supporting Statement from Wales & West Housing was provided. Although further detailed information would be

required as part of any future planning application, the evidence provided has been sufficient to justify the allocation of the site.

It is considered that the Council's response to the concerns raised regarding housing need and the sustainability of the location demonstrates that the site represents an appropriate development option.

Issue – Viability

- Only a summary of the viability assessment has been published.
- Not included with the Independent Financial Viability Assessments in BP42A.
- Viability assessment may need validating considering site constraints.
- The site has viability tension.
- Not a low-risk site which drives abnormal costs.
- Deliverability must be evidenced not assumed.

Council Response

Planning Policy Wales (PPW) directs that "as part of demonstrating the deliverability of housing sites, financial viability must be assessed prior to their inclusion as allocations in a development plan. At the 'Candidate Site' stage of development plan preparation, landowner/developers must carry out an initial site viability assessment and provide evidence to demonstrate the financial deliverability of their sites."

The candidate site submission was supported by a viability assessment prepared using a Development Viability Model (DVM). The DVM has been reviewed by the Council, and it has been demonstrated that the site can delivered 50% affordable housing, as required by Policy HG4.

With regards to abnormal costs, the land value is assumed to take account of any site-specific abnormal costs which at this stage are unknown. A high-level assumption cost has been made in the appraisal which is industry standard.

The assessment concludes that at this stage, it does not appear that financial viability would preclude the development of the site for the uses and quantum of development proposed. More detailed viability appraisals can be undertaken as the scheme proposals are further developed and a greater depth of information relating to the site becomes available.

Summaries of the viability assessments for each of the four affordable housing-led sites are included in Appendix 8 of BP42: Viability Assessment. Although the concerns raised are acknowledged, it is standard practice to publish only summaries of Development Viability Models to maintain an appropriate level of confidentiality.

Issue – Candidate Site Assessment Process

- Conflicts with the site assessment methodology in BP16 – the site was not discounted on account of flood risk.
- The statements at Stage 1 and 2 of the candidate site assessments are inconsistent.
- Concerns regarding the transparency and robust of the site selection process.
- No indication that site assessment methodology has been carried out.
- Scoring should be reviewed.
- No explanation why constraints did not prevent progression.
- Audit trail concerns – N/A values in justification columns.
- The site proforma and scoring rationale should be disclosed.

Council Response

To provide context, it should be noted that the site was first submitted as part of the second call for candidate sites that took place during the consultation on the RLDP Preferred Strategy, between December 2023 and February 2024. The purpose of the Preferred Strategy was to set out the proposed strategic direction that the Council would take in managing development within the Vale of Glamorgan up to 2036, identifying the Council's vision, strategic objectives, and broad spatial strategy. It was not the final RLDP and as such it did not include all the policies, land use proposals or infrastructure. This detail was included in the Deposit RLDP, which set out further specific land allocations, including four rural affordable housing-led allocations. While the Council acknowledges concerns regarding the candidate site process and transparency, as the site in Aberthin was first submitted during the second call for sites, the first formal opportunity for stakeholders and residents to comment on its proposed allocation was during the Deposit RLDP consultation that took place between January 2026 and March 2026.

All allocations that were submitted during the second call for sites were appraised through the candidate site assessment process before being allocated within the RLDP. The process on which sites have been appraised can be found within BP16 Candidate Site Assessment Methodology. All sites submitted were measured alongside 6 sections, which can be found within BP16, and scored through a Green, Amber, Red system, to decipher the sites perceived suitability. It must be noted that the process of appraising sites is not completely quantitative. When appraising sites officers have used their professional judgement alongside key information to give what they feel is the appropriate result in terms of satisfaction of the relevant criterion.

The assessment concluded that:

"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 site has been allocated as an affordable housing led site HG4 (2).”

Additionally, 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. Therefore, the site is considered suitable for allocation in principle, subject to the built development avoiding the small area of flood risk located in the southernmost extent of the site. A viability assessment has also been submitted which demonstrates that the site is deliverable as an affordable housing led site.

A summary of the site’s assessment is available at Appendix 1 of BP18A ‘Candidate Site Assessment at Deposit Plan stage’ which was published for public view and comment as part of the Deposit Plan consultation.

Issue – Infrastructure Capacity

- Infrastructure and services are concentrated in Cowbridge not Aberthin.
- Limited infrastructure and services to cope with additional housing.
- No clear infrastructure strategy to support the development.
- Insufficient capacity in Cowbridge Comprehensive School to accommodate the forecasted additional pupils.
- Insufficient capacity in local schools and GP surgeries.
- Additional secondary school places required to accommodate projected growth.
- The settlement contains no shops and limited community facilities.

Council Response

The Council notes the concerns raised regarding the impact of the proposed allocation on existing services and infrastructure within Cowbridge.

Although Aberthin itself has limited services and facilities, 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. Additionally, the site is located within walking distance of two pubs and Aberthin Village Hall. In this regard, Aberthin is identified as one of the minor rural settlements where small scale development is considered appropriate due to the presence of a primary and secondary school as well as further services and facilities in Cowbridge that are within walking distance of the site and which can serve Aberthin and the wider locality.

Education

In respect of educational provision, the Council has undertaken an assessment of the likely impact of the proposed allocation on school capacity within Cowbridge. At primary and nursery level, there is projected to be surplus capacity at Ysgol Iolo Morgannwg and

Llansannor, meaning that there is sufficient Welsh medium and denominational primary capacity to accommodate additional pupil numbers generated by the development. At English medium primary level, Aberthin is in the catchment for both Cowbridge School (3-18) and Y Bont Faen Primary School, although Cowbridge School is geographically closer. Cowbridge School is projected to have sufficient capacity at primary level.

In terms of secondary education, the Council acknowledges that Cowbridge School has insufficient capacity to accommodate the pupils generated from the development. The Council will therefore seek appropriate Section 106 contributions from the developer towards the provision of additional secondary school capacity to mitigate the impact of the proposed allocation on secondary education provision in the area. There is projected to be sufficient Welsh Medium Secondary places.

The Council is satisfied that through the use of planning obligations secured at the planning application stage, the infrastructure impacts of the proposed allocation can be appropriately mitigated, and that the development can be delivered in a manner that is consistent with the objectives of the Deposit RLDP.

Health

In preparing the Deposit Plan, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes Aberthin and Cowbridge, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built

premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

Issue - Traffic, Parking, Access and Highway Safety

- Has the plan for a bypass been abandoned?
- No outline for the entry and exit for traffic serving these dwellings.
- Existing congestion along the local highway network.
- High volume of HGVs.
- Poor adherence to speed limit.
- Council has failed to calm traffic speeding through the village.
- History of incidents in the area.
- Access is constrained and restricted in width.
- Poor access onto a busy road.
- Introducing another junction would exacerbate existing highway safety risks.
- Routes in the village are already difficult for pupils to cross safely.
- 20mph implemented prior to national limit as a result of highway safety concerns.
- Increased traffic and hazards.
- Additional side road with poor visibility would be very dangerous.
- Increased transport affecting Llanquian road is undesirable.
- Existing developments in surrounding areas have already contributed to traffic through Aberthin.
- Complex road environment through the village.
- Historic planning decisions indicate sensitivity around access to the A4222.
- Highway feasibility required: access location, visibility, swept path tracking and road safety audit.
- Impact on pedestrian safety with increased traffic.
- Unsuitable roads, inadequate pavements.
- History of incidents due to poor visibility around the blind bend.
- No pedestrian crossings have been permitted due to the very sharp bend in the village.
- Parking already oversubscribed.
- A48 via Penylan Road is a dangerous, narrow lane with sharp double ends.
- Creating an access alleyway would be unsafe.

Council Response

The Council acknowledges the concerns raised regarding traffic and road safety in the vicinity of the site. The candidate site submission is supported by a concept masterplan and Transport Note.

The concept masterplan indicates a potential access point to the north east of the site, via a new priority T-junction with Maendy Road. A proposed access arrangement has also been submitted which demonstrates that an access could be achieved.

The Transport Note utilises the TRICS database to anticipate the trip generation of the proposed 25 residential dwellings. The proposed residential development is anticipated to generate 103 two-way vehicular trips over a typical 12-hour weekday period. This equates to approximately one additional vehicle trip onto the highway network every 7 minutes across the 12-hour period. During the typical weekday highway AM and PM peak hour periods (08:00 to 09:00, and 17:00 to 18:00 respectively), the proposed development would be anticipated to generate a total of 13 and 11 two-way vehicle trips respectively. This equates to approximately one additional vehicle trip onto the highway network every 5-6 minutes. The proposed development is therefore anticipated to generate a minimal volume of additional vehicle trips and will therefore have a negligible impact on local highway network capacity.

As part of the Transport Note, a review was carried out on local highway network safety in order to establish whether there are any current accident clusters or safety concerns in the vicinity of the site that may be exacerbated by the proposal. This considered the period 2018-2022 and identified eight recorded personal injury accidents in the wider Cowbridge area, with one serious accident in Aberthin itself.

The highways authority has reviewed the submitted information and has not raised an objection to the proposed site or access point, subject to further information being submitted at detailed design stage. It is noted that the site frontage adjacent to the adopted highway is a short length and it would need to be demonstrated that a new junction could be provided to the authority's requirements The highways authority has advised that further detail will be required on the width of access and visibility splays and there will be a need for a 7-day speed survey. A Traffic Regulation Order will also need to be considered to extend the 20mph limit to also include the site access. The 20/30 mph gateway will need to be relocated. This, together with the cost of the TRO will be a cost payable by the developer.

The highways authority notes that the boundary for the site in the Transport Note appears to indicate a ransom strip between the extent of the adopted highway and the site boundary. However, the Council have reviewed the land ownership boundary and can confirm that the site owner is in control of land up to the full extent of the adopted highway on the eastern boundary of the site.

From a road safety perspective, the Council's Traffic Management team have also reviewed the Personal Injury Collision (PIC) data for the most recent three-year period available from the Welsh Government, covering the period to 28th March 2026. This indicates that no recorded injury collisions have occurred in Aberthin, including on the section of highway adjacent to the proposed development site. Consequently, there is currently no collision history that would suggest an existing road safety concern at the proposed access location.

The Traffic Management team utilises the most recent three-year PIC dataset when undertaking scheme appraisal and determining whether a road safety concern exists, as this aligns with the Welsh Government's approach and eligibility criteria for transport grant funding. For completeness, they have also reviewed the available five-year collision record and can confirm that there have been no recorded personal injury collisions during that period either.

The Council has prepared a Strategic Transport Assessment (BP14/BP14A) to consider the cumulative impact of RLDP developments on the wider network. The Strategic Transport Assessment focuses on strategic housing sites (100 units or more) and therefore this site has not specifically been factored in. However, the cumulative impact of smaller sites is accounted for in the baseline background growth figures using the TEMPro and SEWTM forecasting models. This approach aligns with national policy (TAN 18), which notes that developments under 100 dwellings typically do not require a formal, strategic-level Transport Assessment. Four junctions in the Cowbridge area were modelled due to the potential for an impact in a 2036 scenario with RLDP growth (junction references 2a, 2b, 26 and 27). The modelling showed that junctions 2a, 2b and 27 were all forecast to operate within theoretical capacity. Junction 26 (the signalised junction of Aberthin Road/Cardiff Road/St Athan Road and Eastgate) was assessed as being in capacity in the PM peak but marginally over capacity in the AM peak. The report recognised that peak-period congestion is common across strategic and urban networks and does not necessarily indicate network failure. This junction is not one that has been highlighted as experiencing the most significant constraints or one that requires mitigation as a result of new development. Given the marginal increase in traffic flows likely to be generated from the new development, the effect on the overall highways capacity is forecast to be minimal.

The Transport Note references a commitment to providing a residential Travel Plan for the site, with an emphasis on reducing reliance on single occupancy car journeys and facilitating travel by sustainable modes, articulated in a document that is regularly reviewed.

In order to ensure that the development does not exacerbate existing parking issues, there will be a requirement for sufficient parking to be provided on site as part of the development, in accordance with the maximum standards set out in the Council's Parking Standards Supplementary Planning Guidance. The concept masterplan and Transport Note currently indicate that the proposed development is required to provide a maximum of 66 car parking spaces on the site (61 for residents, and 5 for visitors). The exact requirements

will be determined at planning application stage when the size and type of units will be known.

It is noted that a by-pass for Aberthin was included in previous development plans, including the draft Cowbridge District Plan (1980). However, this not a proposal in the adopted LDP nor within the Regional Transport Plan. The site promoter has not identified that there are any relevant covenants, particularly to reserve the right to build a bypass road, that could prevent or restrict the development of the site.

Comments regarding the volume of HGV's is noted. The site is located along the A4222, a two-lane single carriageway separated by a central white line along its entire length and is therefore considered capable of accommodating a range of vehicle types.

The concerns about speeding traffic in Aberthin are noted. However, this is related to driver behaviour rather than being directly related to any development on this site and is more appropriately addressed through separate measures such as enforcement or traffic interventions. The proposed site access would be at the point that the speed limit decreases from 30 mph to 20mph.

Issue – Poor Active Travel Routes and Public Transport

- Lack of sustainable public transport.
- No specific, sustainable transport measures have been identified.
- Public transport provision is limited to infrequent bus services.
- Lack of safe bus stops.
- No designated active travel routes connecting the settlement to surrounding towns.
- Lack of sufficient public transport may influence travel patterns and increase reliance on private vehicles.
- Unrealistic proposals when new primary school opened that people would walk to the primary school.
- Active travel and public transport assessment required with deliverable mitigation and funding mechanism.

Council Response

It is accepted that transport opportunities in Aberthin are more limited when compared to larger settlements within the Vale of Glamorgan. Notwithstanding this, the site is within walking distance of a number of key local amenities, including Cowbridge School and Aberthin Village Hall.

A Transport Note has been prepared to assess the transport-related matters associated with the proposed site allocation. The assessment examines not only the local highway network but also active travel connections and public transport services.

Whilst public transport options are limited, they are not entirely absent. Currently, the 321 service operates along the B4270 and A4222, which provides connections between Llantwit Major Interchange, Cowbridge and Talbot Green. The comments regarding the safety of the bus stops are noted. Whilst the southbound stop, located approximately 200m south of the proposed access, operates as an informal hail-and-ride service, the northbound stop, situated approximately 100m south of the proposed access, is equipped with a traditional brick-built shelter and is considered to provide a safe waiting area for passengers.

In addition, the Council is tendering for 3 additional rural Vale bus services. This is likely to include a service between Llantwit Major and Bridgend as well as another between Cowbridge and Barry which will serve Cowbridge, providing at least 4 services per day in each direction. The existing 321 service connects Aberthin with Cowbridge, enabling Aberthin residents to access these services.

The Council also operates the Greenlinks Community Transport scheme, which provides demand-responsive transport across the rural Vale of Glamorgan. Greenlinks offers a practical and affordable solution for residents who may have difficulty accessing essential services and amenities. The scheme operates a fleet of accessible minibuses and cars which can be booked.

In respect of active travel, pedestrian access will be provided via the existing footway along the western side of Maendy Road. In addition, a pedestrian/cycle connection will be made to the existing PROW that runs along the western boundary of the site. The existing c.2.0m wide footway that runs along the northern side of Maendy Road connects the site with Cowbridge School in a westerly direction, approximately 650m away. Cowbridge town centre, which lies just over 2000m to the south west, can also be reached via the existing footway network in approximately 23 minutes.

Access to local services and facilities within walking distance is considered to reduce reliance on private vehicle travel. In addition, the Transport Note considers that the proposed density is likely to give rise to a minimal volume of additional vehicle trips.

Furthermore, the Active Travel Network Map identifies a future walking and cycling route between Cowbridge and Ystradowen (referenced Future 017A), which, depending on the preferred route option, would either pass directly through Aberthin, or follow an old railway line in close proximity to the village. Welsh Government Active Travel funding was received in September 2021 to look at active travel route options between Cowbridge and Ystradowen. A consultation was held in June 2022 which sought the views of residents on potential route options. Due to funding and objections, the scheme has not progressed beyond concept design stage.

A contribution toward improving Sustainable Transport will be a requirement of a future planning permission being granted, as set out in Appendix 2 of the Plan.

Issue – Flooding and Drainage

- Lies partially within Flood Zone 3.
- Has mapped intermediate surface water risk.
- Has groundwater classified "Red – High."
- Has access within Flood Zone 3. Flood events could potentially affect access and egress.
- Has a history of flooding (DEVELOPMENT ADVICE MAP Zone B).
- Requires Ministerial notification.
- Requires FCA and groundwater monitoring.
- Requires SUDs viability assessment.
- Requires SSSI/ecology assessment.
- Located on a flood plain.
- Requires Welsh Government notification.
- Proceeds without any hydraulic model.
- Proceeds without FCA.
- Proceeds without groundwater monitoring.
- No-worsening test absent.
- No SUDs viability assessment.
- Contains mapping discrepancies – location of SuDS appears to fall within Flood Zone 3 which raises concerns regarding compliance with SuDS design guidance.
- Defers critical evidence to application stage.
- The area is susceptible to surface water runoff due to the steep topography of surrounding higher ground.
- No modelling that considers the impact on neighbouring properties.
- Highly vulnerable development on greenfield land is not permitted under TAN15 unless the development is essential to the LDP which this site cannot be reasonably be considered as.
- Effects on local utility services which are already poor.
- Effects on the existing poor drainage system.
- Building here will push water contained here into other areas and worsen flooding in the village.
- Previous developments have had an impact on flooding elsewhere in the village.
- Risk of flooding should not be ignored as the case with the development of Court Close.
- Requires assessment of access/egress for residents and emergency vehicles during flood events.

Council Response

Whilst the Council acknowledges concerns relating to flood risk, this has not been ignored. In terms of site-specific evidence, a Flood Consequences Assessment (FCA) and Drainage Strategy Report (DSR) was prepared in support of the candidate site submission. The report outlines the potential flood risk to the candidate site, the potential impact of the proposed development on flood risk elsewhere, and the proposed measures which could be incorporated to mitigate any identified flood risk.

The report has been prepared in accordance with the guidance contained in Planning Policy Wales (PPW) and Technical Advice Note 15 (TAN15 and in consultation with Natural Resources Wales (NRW) including the Flood Map) for Planning Wales.

The NRW Flood Map for Planning indicates that the majority of the site falls within Flood Zone 1 (Rivers) but the site's southernmost extent is shown to fall marginally within Flood Zone 2 (Rivers) and Flood Zone 3 (Rivers).

In addition, site-specific Strategic Flood Consequences Assessment was also prepared by JBA on behalf of the Council, as detailed in BP21A Appendix 5. This assessment evaluated the risk of flooding from all sources to the site as well as the appropriateness of development at the site in accordance with Welsh government policy as outlined in TAN15. Furthermore, recommendations are provided to mitigate the risk of flooding at the proposed development as well as recommendations for further works where required.

The SFCA highlighted that there was very low risk of flooding from surface water and small watercourses, reservoirs, sewers and the sea. The area has high vulnerability to groundwater flooding based on the underlying geology and superficial deposits. However, there have been no recorded incidents or groundwater flooding in Aberthin therefore it is concluded that the risk of flooding is moderate. There is also a moderate risk of fluvial flooding as a small part of the site is within Zone 2 and 3 of the Flood Map for Planning.

No detailed model is available of the Nant Aberthin. To better understand the risk of flooding posed to the Site and the potential implications of climate change, the NRW National Flood Hazard Mapping (NFHM) dataset has been used to provide a further assessment of flooding. This dataset contains predicted flood extents, depths and velocities for both the present day and climate change scenarios and has been used to identify the predicted flood extents and depths for both the 1% AEP plus climate change (medium risk), and 0.1% AEP plus climate change (low risk) flood events at the proposed redevelopment site.

During the 1% AEP plus climate change event, very shallow flooding of up to 30mm is predicted to occur to a small area of the southern extent of the Site, as shown in Figure 4-1. This is associated with out-of-bank flooding from the Nant Aberthin, which flows into the area of the lowest ground elevation. The proposed location of residential units as indicated by the indicative site out, will remain flood free in this event. The proposed SuDS detention basin is also shown to be flood free.

Figure 4-2 demonstrates that the southern extent of the Site is predicted to flood during the 0.1% AEP plus climate change event. Generally, flood depths are predicted to be below 50mm, with a localised maximum of 173mm where ground levels are lowest. The proposed location of residential units, as indicated by the indicative site out, will remain flood free in this event. The location of the proposed SuDS detention basin is shown to flood during this event. However, flood depths are shallow with a maximum depth of 40mm indicated. Typically, depths are between 10 and 12mm across much of the proposed basin area.

With regards to groundwater flooding, a programme of groundwater monitoring is proposed as well as detailed ground investigations at planning application stage.

The SFCA confirms that TAN 15 states that where part of a site is within Zone 3 on a greenfield site, it needs to be referred to the Welsh Ministers. However, it is understood that as development proposals take a sequential approach to site master planning to manage flood risk in line with the requirements and principles set out within TAN-15, Ministers are unlikely to refuse such an application.

The indicative layout shows that the development proposal has been designed sequentially with residential units located entirely within Flood Zone 1. A proposed SuDS detention basin is located to the south of the site and is within Flood Zone 2.

As per the advice of the CIRA SuDS Manual, SuDS should not be located within an area at a greater than 1% AEP chance of flooding, which aligns to Flood Zone 3 of the NRW FMfP - Flood Risk from Rivers. The proposed detention basin is located within areas of Flood Zone 2 within the site. Therefore, subject to SAB approval, the proposed location of the SuDS features is in keeping with current guidance.

NRW have not raised an objection to the allocation of the site in the RLDP on the grounds of flood risk. However, in April 2026, the Welsh Government issued a 'Dear Chief Planning Officer' letter indicating that there had been changes to the climate change allowances guidance. The letter stated that development plans submitted to Welsh Government for Examination from 1st April 2026 should include SFCAs informed by the latest climate change allowances. Following discussions with NRW, the Council commissioned JBA to prepare an addendum to the SFCA work. This concluded that the revised climate change allowances would not affect the recommendations for the assessed sites, including Aberthin. However, the revised climate change assumptions would need to be used in any detailed flood modelling required to support a planning application. NRW were consulted on the Addendum and in July 2026 advised that they had no adverse comments to make.

The matter of safe access and egress is considered within the report in the context of flood evacuation. This will be provided north east via the A4222 to an area of higher ground that lies outside of the extreme flood events as shown in figure 2 below. Additionally, the report recommends that the site owners/residents should register to receive NRW Flood Alerts that currently cover the site which provide warnings of a fluvial flood event. Furthermore, the

report recommends that an evacuation procedure and action plan should be drawn up and consulted with the Council.

The Flood and Water Management Act 2010 (Schedule 3) requires new development to include SuDS features that comply with national standards. The report has assessed the site against the priority hierarchy identified in SuDS standards. Where reuse and infiltration are not viable solutions, connection to a surface water body is the next consideration. The Nant Aberthin is located approximately 30m directly south from the southern extents of the site. Therefore, the discharge of surface water follows the priority hierarchy with a viable solution of discharge to the Nant Aberthin proposed. Whilst this offers the solution that best represents the status quo and existing, natural drainage – it also provides betterment in terms of water quality treatment and discharge rate compared to the existing unfettered arrangement.

Regarding the location of the SuDS features, it is important to note that the current concept masterplan for the site is indicative, and the exact layout will be determined as part of any future application. The proposal will be subject to approval by the SuDS Approving Body (SAB) who are responsible for assessing the design against the statutory standards and ensure that it complies with regulations.

Although the Council notes concerns raised in respect of impact on neighbouring properties, the report considers that the development will not increase flood risk elsewhere or to third party land/infrastructure. The site is largely located outside of the extreme flood extents and there will be no subsequent loss of floodplain/storage. The proposal will be subject to a SAB application and all excess surface water runoff from impermeable surfaces to be contained on-site prior to discharge into the Nant Aberthin at a controlled rate.

In accordance with the outcomes of the FCA and DSR and SFCA the Council considers that the site is suitable for allocation in principle, subject to the built development avoiding the small area of flood risk located in the southernmost extent of the site.

In respect of drainage, DCWW have advised that there is sufficient capacity within the existing water, sewerage and WwTW infrastructure to accommodate the proposed development.

Issue – Loss of Green Space

- A valued green space, widely used by villagers.
- Often used for walking.
- Rural Vale has very few green spaces left.
- Valuable recreational space.
- The ‘central play area’ consists of large boulders and a bench.

Council Response

Although the Council notes concerns regarding the loss of green space, the site is private land and not a designated area of public open space under the adopted LDP. In terms of existing open space in the village, there is a small play area located approximately 500m (5-minute walk) from the site as well as Stalling Down Common Land which is under 500m away from the site. A Public Right of Way is also accessible to the west of the site.

Furthermore, the development would include an area of public open space that would be available for use by local residents and the wider community. The concept masterplan envisages an 'open' development with dwellings positioned around a central amenity area. Further open spaces are proposed either side of the entrance off Maendy Road together with an amenity area towards the southern tip.

The detailed design of the access, road layout and central public open space will be considered and determined at the planning application stage.

Issue – Greenfield Development

- Greenfield site.
- Green belt.
- Should focus development on brownfield sites.
- Will create a gateway for greenfield sites unsuitable for housing.
- Conflicts with the protection of greenfield land.

Council Response

In relation to concerns regarding greenfield development, a key component of the RLDP Strategy is "Allowing for regeneration opportunities on previously developed and underutilised land." However, there is limited deliverable brownfield land available in appropriate locations, resulting in the RLDP being required to consider greenfield sites.

This site is not protected under a green wedge or green belt designation. There are no green belts located within the Vale of Glamorgan.

Although concerns are noted, the Council does not consider that the proposed allocation would create a gateway for unsuitable housing development on greenfield sites. As set out in the Council's response to comments in respect of sustainability and affordable housing need, the site is considered to be suitable and justified in accordance with the RLDP's spatial strategy and settlement hierarchy. In terms of the RLDP's role in protecting greenfield land, under Policy SP3, areas outside the settlement boundaries that are not allocated or protected for a specific use will be defined as countryside. Policy SP3 sets out the policy framework for the management of development within the countryside and provides a

balance between safeguarding and protecting the intrinsic character of the rural Vale, whilst enabling new development that is deemed appropriate for a rural location.

Issue – Alternative Sites/Area

- Should focus development within existing towns and villages.
- Alternative sustainable sites are available.

Council Response

The RLDP Strategic Policy SP1 sets out the spatial strategy for the plan and hierarchy of settlements where future development is considered. This sets out that the majority of future housing would be directed to the largest Key, Service and Primary settlements which are served by good public transport links and offer a range of services and facilities. Outside this strategic growth area, the majority of settlements are located within rural areas, which the Council recognise as having an important role both economically and socially for the residents of the area. The Plan seeks to support these areas by allowing for some small-scale developments in appropriate locations.

Cowbridge also forms part of the Strategic Growth Area and provision has been made for several sites which will deliver new homes in the Cowbridge area. Sites are currently under construction at the Former Cowbridge Grammar School, the Former Cowbridge Police station and at Clare Gardens (Darren Farm) – a significant site being developed across several phases. In addition, another site is allocated at St Athan Road for over 100 dwellings.

In regard to alternative sites, the RLDP's housing allocations are guided by a sustainability framework, the local evidence base and the specific candidate site submissions received by the Council. The RLDP should only allocate sites that are demonstrated to be deliverable and the availability of sites, as demonstrated by a candidate site submission, is a key factor in deliverability. While the Council evaluates all potential rural settlements where sites have been submitted, allocations are directed to locations that demonstrate the highest balance of sustainability, accessibility, and infrastructural resilience, alongside local housing need.

Issue – Soundness

- Unsound planning judgement.
- Fails the key tests of soundness – not justified, not effective and not consistent with national policy.

Council Response

The Council considers that the Plan, its policies and allocations are sound, and this is demonstrated in BP4A *Assessment of Deposit Plan against the Tests of Soundness and Future*

Wales. This position is further supported by the Welsh Government's response to the Deposit RLDP, which concluded that the Plan is in general conformity with Future Wales and specific policies within it.

Furthermore, the Plan and its supporting documentation, including the Consultation Report, will be considered by Full Council for approval to submit it to the Welsh Government, who will arrange for an independent Planning Inspector to be appointed to examine the Plan.

The Planning Inspector will consider whether the Plan is fit for purpose by assessing it against three tests of soundness:

- Test 1: Does the plan fit?
- Test 2: Is the plan appropriate?
- Test 3: Will the plan deliver?

The Inspector will consider the written representations that have been made during the Deposit Plan, organise Hearing sessions and then produce a report which considers the issues raised. Ultimately, the Inspector will determine whether the Plan is sound or sound subject to changes, which may consist of redrafted text, the omission or inclusion of a policy, or changes to the proposals map.

Following receipt of the Inspector's report, the Council will be in a position to adopt the RLDP, which will replace the existing adopted Local Development Plan 2011-2026, and it will become the framework against which decisions on planning applications within the Vale of Glamorgan are made.

Issue – Biodiversity and Environmental Impact

- Deleterious affect on nature and biodiversity.
- Detriment of wildlife and the environment.
- Rare orchids grow on the site.
- Environmental impact of added pollution.
- Destroy the habitats of many animals.
- Contains established hedgerow boundaries forming part of the historic field pattern of the Vale landscape.
- Confirmation regarding protection of hedgerow.
- The site lies above permeable limestone classified as a Principal Aquifer, overlain by alluvial valley deposits.
- Ecology and heritage appraisals required.
- Lies close to Cors Aberthin SSSI.

Council Response

As part of the evidence base for the proposed development, a Preliminary Ecological Appraisal (PEA) was undertaken in 2023. The report indicates that the majority of the proposed development is semi-improved grassland bounded by hedgerows on the southern, western and eastern boundaries. The north eastern boundary is a post and rail wooden fence with a small area of bramble scrub.

The PEA indicates highlights that there is no further survey work recommended in respect of Great Crested Newts, dormouse or otter. The habitat is considered to have low suitability for commuting or foraging bats but there may be a need for transect surveys, subject to the detailed development proposals. Reptile surveys are required to support any planning application.

The report sets out a series of recommendations for any future development, including implementation of appropriate mitigation measures. The report also identifies the need for further ecological survey work to be completed prior to the submission of a planning application.

The report it acknowledges that hedgerow habitat is present within the site boundary. Hedgerow is a section 7 habitat of importance for protection under the Environment (Wales) Act 2016. If impacts are unavoidable, the report highlights that hedgerow translocation and/or replacement planting must be provided. Additional hedgerow planting within the site of native species with an appropriate aftercare regime must be provided and the translocation of already established hedgerow should also be considered. A buffer of at least 3m from retained hedgerow is recommended.

The supporting information and concept masterplans prepared demonstrate that the proposed properties will have generous rear gardens to ensure they are set well back off the existing hedgerows to protect the existing green infrastructure and assist in reducing any visual impact.

According to Appendix 1 of the Preliminary Ecological Appraisal, no orchid species were recorded among the plant species identified on site.

Natural Resources Wales (NRW) was consulted on the candidate site, where they advised that the site was suitable for further consideration, whilst noting the need for full ecological surveys at the appropriate time. NRW did not identify the Aberthin site as being located over a principal aquifer in its response and raised no other concerns regarding the site.

Any further development would need to adhere to Policy DNP5 on Environmental Protection, which considers sources of pollution. There are no records of contamination on the site. Appendix 2 of the RLDP sets out potential initial surveys that may be required.

The Preliminary Ecological Assessment does confirm that there is one statutory protected site within 2km of the site. The Cors Aberthin Site of Special Scientific Internet (SSSI) is

located approximately 200m to the west of the site at its closest point. Cors Aberthin SSSI is designated for its high quality marshy and species rich neutral grassland. Given the localised nature of the development proposal, the assessment considers that there is unlikely to be any adverse effect to local statutory and non-statutory designated sites.

Issue – Landscape and Visual Impact

- Negative impact on views throughout the village.
- Development would introduce built form into the visual foreground of the village when viewed from elevated land, particularly from Stalling Down.
- Sensitive landscape and environmental setting.
- The site lies entirely within a Special Landscape Area.
- Contributes to the countryside setting of the Aberthin Conservation Area.
- Two-storey housing would likely be prominent within these views and extend the visual footprint of the settlement into the valley landscape.
- Site lies within the foreground of a view recognised and protected within the Conservation Area Appraisal.
- Landscape and visual assessment required for SLA impacts.

Council Response

While the concerns regarding the site's location within the SLA are noted, the Council would advise that the SLA are not intended to prevent development. Rather, and as set out within paragraph 6.414 of the Deposit Plan, they are intended "*to ensure that where development is acceptable careful consideration is given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected*." Paragraph 6.415 of the plan then sets out that any such development within SLAs will be required to fully consider the impact of the proposal on the SLA through the submission of a Landscape and Visual Impact Assessment (LVIA).

Therefore, while accepting the proposed site's location within the Upper & Lower Thaw Valley SLA, the Council considers that any adverse impacts arising from the proposed development on the SLA would be adequately addressed through this mechanism and that such matters would be fully considered through the planning application stage where such matters as the scale, layout and visual integration of development can be controlled through sensitive siting, structural landscaping and screening, ensuring that the proposal responds appropriately to its rural context.

The Council notes concerns raised in respect of the Aberthin Conservation Area. The site is not located within or adjacent to the Conservation Area boundary. As stated in the *Conservation Areas in the Rural Vale* Supplementary Planning Guidance (SPG), the stream and wayside verges on Llanquian Road determine the special character of the Conservation

Area. Beyond this, the character of the village becomes more urban due to contemporary housing along the A4222. The proposed development would result in an extension of this urban character and would therefore have some impact on this wider setting of the conservation area. There will be a requirement for any future planning application to be supported by a heritage impact assessment.

Furthermore, it is acknowledged that the site would be partially visible from the common land of Stalling Down to the Southeast. As set out within the Aberthin Conservation Area Appraisal and Management Plan (2009), the Council will seek to ensure that all development respects important views within, into and from the Conservation Area.

The concept masterplan indicates that the proposal will seek to protect and enhance green infrastructure, as well as provide a SuDS feature towards the southernmost extent of the site which would serve to soften the impact of the introduction of dwellings within the site and assist in reducing visual impact. Additionally, it would be viewed in the context of existing development that is also not located within the Conservation Area. It is therefore considered that residential development on the proposed allocation would not result in an unacceptable adverse impact on the visual amenities of the wider area. This conclusion is consistent with the findings of the Officer's Report for the Court Close development, which was approved in 2016 and is located in a broadly similar position and distance from the Conservation Area.

Issue – Public Right of Way

- Public right of way interacts with the southern access area.
- Realignment of the public right of way would fundamentally alter the character of the route.
- Any diversion of a Public Right of Way requires a legal order under the Highways Act 1980.
- Proposed diversion appears to coincide directly with the existing boundary hedgerow, and any removal may be legally restricted or refused if the hedgerow qualifies as an Important Hedgerow under the Hedgerows Regulations 1997.
- Not clear in the plans whether there will remain safe access to this route into Cowbridge.
- Community pathway to Cowbridge.
- Used as a safer, greener walking route into Cowbridge.

Council Response

The site promoter has confirmed that the existing route of the Public Right of Way (PROW) footpath that runs along the western boundary of the site can be retained with no diversion. There will therefore be no loss of hedgerows as a result of the PROW. If this position changes

at detailed planning application stage, then the correct procedure will be followed. However, it is considered that the size of site is sufficient to be able to accommodate the PROW.

The supporting information and concept masterplans prepared demonstrate that the proposed properties will have generous rear gardens to ensure they are set well back off the existing hedgerows to protect the existing green infrastructure and assist in reducing any visual impact.

Issue – Village Character

- Will destroy the character and nature of the small village.

Council Response

It is recognised that maintaining the distinctive character and appearance of settlements is an important planning objective. However, it is not considered that the development, in principle, would result in unacceptable harm to the character of Aberthin as this site is adjacent to an existing housing estate and represents an appropriate extension to the settlement that will contribute towards meeting the ward's affordable housing needs. Any future development would also be required to respond sensitively to local character through appropriate scale, massing, and height and use of appropriate materials.

Issue – Community Impact

- Impact of extra houses on the quality of the existing playground.
- Negative impact on community safety.
- Reduce the quality of life for existing residents.
- Strong community opposition.
- 100 signatures on VOG petition.
- Waste of tax payers time and money.

Council Response

The Council notes concerns raised regarding the potential impact on the quality of the existing playground located approximately 500m from the site. The proposal does not involve the loss of any public open space or recreational land, and the existing play area would remain accessible for public use. The scale of the development is not considered likely to result in an unacceptable impact on the quality or function of the playground.

With regard to community safety considerations, residential development proposals are normally subject to formal consultation with the South Wales Police Designing Out Crime Officer who provides advice in respect incorporating measures to ensure developments are

safe and reduce opportunities for anti-social behaviour, whilst encouraging community cohesion.

The Council recognises that new development has the potential to impact upon a wide range of matters which can affect the health and wellbeing of the population. To ensure that new developments consider the health impacts of development, Policy SP5 sets out the requirements for site promoters to undertake an assessment of the proposed development prior to the submission of a planning application or at the pre-application stage.

All planning applications of 10 residential units or more will require screening for a HIA using the Council's Health and Wellbeing Checklist. The screening stage offers a systematic way of deciding whether a full HIA is required. Screening should identify who is potentially affected by a proposed development, the impact, if any, on health as well as the potential scale of any impacts identified. The screening assessment will generally be proportionate to the size of the development; the larger the development the more detailed the responses to the questions will be expected to be, whereas smaller developments are more likely to provide a brief summary. Details of the requirements are set out in the Council's Healthy Placemaking Supplementary Planning Guidance.

The Council have fully considered all representations made as part of the Deposit Plan consultation and where changes are identified as needed, these have been identified during this process. Although the Council acknowledges the objections to this site, a balanced assessment of all material planning considerations is required to ensure the Plan remains sound and delivers the housing and employment needs identified in the spatial strategy.

Council Overall Response

Following a detailed review of the representations submitted in respect of HG4.2 Land West of Maendy Road, Aberthin, the Council acknowledges the range and breadth of concerns raised. The Council recognises that the delivery of appropriate infrastructure and mitigation measures will be essential to ensuring that the development is brought forward in a coordinated, sustainable and responsible manner, and these considerations have informed the allocation of the site.

Many of the matters raised relate to detailed design, technical and operational issues that are most appropriately assessed when a planning application is submitted and full development proposals are available. However, for the purposes of plan preparation, the Council is satisfied that there is sufficient evidence to demonstrate that the site represents an appropriate, sustainable and deliverable allocation within the RLDP. The allocation is considered to accord with the Plan's strategy and strategic objectives and is therefore regarded as sound.

HG4.3 LAND AT HEOL FAIN, WICK

Representation ID	Respondent Name	Representation Type
4395	Mrs Catrin Eveleigh [2749]	Object
4398	Mr Lloyd Eveleigh [2752]	Object
4400	Mr Richard Powell [2753]	Object
4401	Owain Bainbridge-Rees [2754]	Object
4406	Mrs Trudy Seabourne [2757]	Object
4448	Mr Benjamin Bowen [2781]	Object
4453	Mr David Jones [2785]	Object
4469	Mr Clive Clarke [2800]	Object
4493	Mr John Williams [2820]	Object
4514	Mr Geoffrey Goater [2825]	Object
4728	Mr Julian Bowles [2902]	Object
4730	Mr Myles Povey [2903]	Object
4731	Mrs Lynne Rockett [2904]	Object
4740	Mr R Goddin [2907]	Object
4775	Mrs Helen Cook [2937]	Object
4827	Mr Francis Rockett [2967]	Object
5007	Mr Robert Davies [3074]	Object
5054	Mr Richard Christopher [3100]	Object
5166	Miss Lynn Goward [820]	Object
5310	Mrs Claire Murphy [3229]	Object
5370	Mr Gareth Thomas [2975]	Object
5381	Mr Gareth Thomas [2975]	Object
5384	Mrs Clair Thomas [3069]	Object
5396	Mrs Clair Thomas [3069]	Object
5590	Mr Peter Rogers [3298]	Object
5774	Mr Marc Baker [3363]	Comment
5878	Mr Anthony Cooke [3087]	Object
6113	Mr Geraint White [3473]	Object
6114	Mr Geraint White [3473]	Object
6196	Mr David Ambrose [3488]	Comment
6450	Wick Community Council (Councillor Baker) [3585]	Object
6452	Wick Community Council (Councillor Baker) [3585]	Comment
6575	Mr Philip Murphy [1004]	Object
6798	C Baker, G Davies and J Hill [3762]	Support
6991	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7051	Marion morgan [2413]	Comment
7153	Peter Stone Properties Ltd [1182]	Comment
7174	Wig Fach Property Company Ltd [2373]	Comment

A total of 38 duly made representations were submitted in respect of HG4 (3) Land at Heol Fain, Wick, from 34 representors. This included 1 representation of support, 7 comments and 30 objections. It should be noted that some representors submitted more than one

representation in respect of the site. Duplicate representations have only been counted once, but if representations made different points, these have been counted separately.

Several respondents made representations on the candidate sites (404, 2813) rather than the allocation. As these object to the principle of the housing allocation, these are dealt with under this response.

The key issues raised include legal rights of access, highways issues including capacity, concerns around over-development, loss of green space, lack of services and infrastructure, residential amenity and public health, and the candidate site assessment process. In addition, concerns were raised on affordable housing need, sustainable transport, the settlement hierarchy, lack of employment opportunities, the settlement boundary review, flooding and drainage, land stability, as well as impact on house prices and loss of views.

The statutory consultee response from DCWW has been addressed first. As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

STATUTORY CONSULTEE RESPONSES

Rep 6991 – Dwr Cymru Welsh Water

- Water Supply - A hydraulic modelling assessment (HMA) will be required.
- Wastewater - The public sewerage network can accept potential foul flows from this development site. A 6” diameter abandoned sewer crosses the site. The site is near to a Sewage Pumping Station (SPS) and we would recommend that the LPA discuss the potential allocation with their Environmental Health Department. To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.
- Wastewater Treatment Works - Wick WwTW has capacity to accept foul flows from the proposed development.

Council Response

Dwr Cymru Welsh Water (DCWW) comments noted. These are currently reflected in the Infrastructure Plan (BP44) and Appendix 2 of the RLDP.

INDIVIDUAL RESPONSES

Rep 6798 – C Baker, G Davies and J Hill (as executor and beneficiary of E Hill’s estate) (DPP Planning) - Support

The site it is physically, legally, and infrastructurally connected to the nearby residential area. The site complements the existing development. We are committed to working with the Council for its timely development, addressing local rural housing needs effectively.

The Site is readily accessible via St James Road. The Supplemental Agreement dated 20 November 2015, which includes the Transfer details, confirms that the estate road linking the Site to the adopted highway at St Brides Road was expressly intended to serve the retained land (the Site) without the creation of any ransom position. The registered title also confirms the absence of any legal impediments to utilising this access. Furthermore, access through St James Gardens does not require consent from the private management company, and the title register confirms no restrictions that would prevent vehicular or pedestrian access via this established route.

This position is reflected in the signed Legal Agreement for the sale of the freehold property which has already been developed by BDW Trading Limited. Clause 13.5 states "The Buyer shall ensure that in any planning layout in respect of the Property that the layout provides for the benefit of pedestrian and vehicular access to the boundary between the Property and the Retained Land by means of the construction of a roadway to be built to adoptable standards leading to the boundary between the Property and the Retained Land to enable the continuing access and egress from the Retained Land over the Property, but subject always to the same having been approved by the local planning authority and/or local highway authority".

Additionally, the title and plan for the retained land (WA986140) also notes that an easement has been registered pursuant to the terms of the agreement with BDW and the Land Transfer.

Council Response

The site promoter's support for the allocation is welcomed, and the detailed confirmation regarding the legal right of access via St James Road is noted.

COMPOSITE RESPONSE

COMMENTS/OBJECTIONS

Issue – Right of access over private land

- St James Gardens is privately owned, and roads are unadopted by the Council and Welsh Water. Vale Council absolved their responsibilities for the common areas (roads, pavements, street lighting, green spaces, and playgrounds). Residents pay a service charge to First Port Management Company for maintenance of roads and open space.
- The Vale of Glamorgan Council does not have any legal interest in St James Gardens. The Council has no right to permit access to this development for construction traffic to build new houses, or to permit use of these roads for continued through traffic to any new houses.

- Increased usage would place unfair maintenance costs on current residents. Concerns are raised over who would be responsible for any damage caused to these unadopted, privately maintained roads.

Council Response

The Council's Highways team have been consulted regarding the matter of access, and have confirmed that the St James estate is managed by a private estate management company, and that the developer has chosen not to request road adoption from the Council.

The Council has investigated the legality of delivering an access to the site via the St James estate and can confirm that a right of vehicular access was retained as part of the previous land transfer of the land, as the owners of Land at Heol Fain were the previous owners of the land at St James estate before it was sold to a developer. When the St James Estate parcel was originally transferred, explicit legal easements and privileges were formally reserved for the benefit of this proposed housing site at Heol Fain. The legal framework to permit continuous through traffic and infrastructure access to the new housing development is therefore fully secured in the property deeds, and it is therefore this is not a barrier to deliverability.

Issue – Highways Access

- Clarification requested on the proposed access arrangements, whether the St James Gardens estate is expected to provide access, and any highway safety assessments that have been undertaken.
- Heol Fain is a narrow, poor-quality rural single-lane road not designed for residential or heavy road traffic. Currently, the road conditions would not be able to cope or sustain the weight of heavy vehicles because the physical road construction is insufficient.
- Widening the lane for heavy commercial vehicles would be unsafe, environmentally damaging, and would harm its character, breaching planning policies.
- Its western junction meets a 60mph unlit road, presenting significant safety hazards. There are no pedestrian facilities, and significant engineering work would be needed to make it compliant, conflicting with sustainable transport principles.
- The existing estate, which already serves approximately 120 homes, has only a single access and exit point. Introducing a further 50 properties will leading to a significant increase in traffic volume and congestion.
- Access to the site is physically constrained. Parking problems exist throughout, particularly outside numbers 62 and 66 St James Road, which was worsened by the Council permitting a higher housing density than normal. When cars are parked there, it is not possible to pass, making access to any new development impossible.

- The street and areas targeted for access are currently used as a playground for children living on the estate.
- There will be disruption during construction phases – construction traffic should not use St James Garden due to safety concerns and the impact of heavy building plant on estate roads.
- The small entrance to the site will cause access and egress problems both during and after the building phase.
- The proposal conflicts with the Vale of Glamorgan Well-being Plan 2023–2028 and the principles of Placemaking Wales. The allocation is an "unplanned add-on" rather than a site built with consideration for physical constraints.
- No evidence is provided that safe or sustainable access can be achieved. Without clear evidence of safe, policy-compliant access without substantial alteration, the allocation is unsound and should be removed.

Council Response

For clarity, Heol Fain is not proposed to provide the access to the housing site. The Council recognises that Heol Fain is likely to be unsuitable for residential or heavy road traffic. Instead, access is proposed through the adjacent housing estate on St James Road. During candidate site assessments, high-level highway assessments have been undertaken in order to assess the principle of safe vehicular and pedestrian access to the site. A Strategic Transport Assessment has also been carried out across the entire of the Vale of Glamorgan to examine current traffic volumes and congestion areas across the Vale's major transport corridors.

While on-street parking can cause minor restrictions to vehicle flow, it is considered that this is principally a traffic management and enforcement matter rather than a physical constraint to a site allocation.

While the Council acknowledges that residential streets are frequently used for informal play and recreation by local children, public highways and adopted roads are primarily designed to facilitate safe pedestrian and vehicular movement. The layout, design, and suitability of the proposed site access will be fully assessed against national planning policy and highway safety standards. Any future development will be required to demonstrate that safe access can be achieved for both new and existing residents, ensuring that pedestrian safety and the residential amenity of the local community are maintained.

The unadopted status and private management of the estate roads are noted. The Council recognises that the maintenance and upkeep of these roads are the responsibility of the private management company and the residents who fund them.

While the control and use of private land or unadopted infrastructure is ultimately a civil matter between the developer and the relevant landowners or management company, any

future development proposal must demonstrate a viable, safe, and legally deliverable construction management plan. This issue can be mitigated by way of planning conditions before any development occurs, such as requiring a Construction Traffic Management Plan (CTMP) to assess the suitability of any proposed routing, vehicle sizes, and mitigation measures to protect local infrastructure and residential amenity.

Rather than being an 'unplanned add-on', the site has been assessed against at Candidate Site stage and in an independent Integrated Sustainability Appraisal to ensure that the site is in conformity with the principles of placemaking and Planning Policy Wales in general.

The Vale of Glamorgan Well-being Plan 2023-2028 has been developed in the context of the Well-being of Future Generations (Wales) Act. Similarly, Planning Policy Wales and Future Wales have also been written in the context of the Act. National planning policy has been fully considered in assessing candidate sites and preparing this LDP. As such, the site and the RLDP's framework naturally reflects and supports the core priorities of the Well-being Plan. Further, Welsh Government have confirmed that the RLDP is in general conformity with national planning policy.

The Council notes the specific context regarding the existing 120-home estate and the scale of the proposed 50-dwelling allocation. While the addition of 50 homes represents an increase in proportion to the existing estate, the threshold for highway capacity and safe access is determined by vehicular capacity and design standards rather than a fixed percentage growth limit. The Highway Authority reviews the cumulative impact on the network layout to ensure that a single access point can safely serve the combined total of roughly 170 homes in accordance with national design guidance.

The principle of gaining safe access to the site via St James Road is considered acceptable by the Council's Highways department. Further highway assessments to ensure safe access will be fully evaluated by the Highways department at detailed planning application stage. Any future planning application must include a detailed transport assessment and demonstrate that the single access point can safely accommodate the additional traffic without causing unacceptable congestion or safety hazards for existing residents.

Issue – Highways Capacity

- Local roads are constrained. The roads and increased traffic for 50 properties in a small localised area would create significant traffic for what is a low volume road to Bridgend.
- The increase in potential traffic due to the rural location would inevitably lead to higher traffic volumes in the village and additional road noise and vehicle emissions.

Council Response

The Council has prepared a Strategic Transport Assessment (BP14/BP14A) to consider the cumulative impact of RLDP developments on the wider network. The Strategic Transport

Assessment focuses on strategic housing sites (100 units or more) and therefore this site has not specifically been factored in. However, the cumulative impact of smaller sites is accounted for in the baseline background growth figures using the TEMPro and SEWTM forecasting models. This approach aligns with national policy (TAN 18), which notes that developments under 100 dwellings typically do not require a formal, strategic-level Transport Assessment.

Temporary impacts during the construction phase, such as parking issues, are recognised as a short-term disruption rather than a permanent constraint to long-term allocation or sustainable development. This will be considered further at detailed planning application stage and will require the submission and approval of a Construction Method Statement (CMS) or Construction Traffic Management Plan (CTMP) to protect local residential amenity and prevent highway obstructions.

Environmental constraints, such as potential noise and air pollution, are monitored through the Integrated Sustainability Appraisal (ISA) process. Site-specific noise and emissions assessments will be required at the full application stage to ensure that there is no unacceptable impact on noise pollution or air quality within Wick.

Issue – Over-development

- Wick has experienced intense expansion over the last 10 years, with 141 homes built (including the 124-home St James Gardens/Rectory Field estate and 17 recent affordable homes on St Brides Road). This has already increased the village's size by approximately 70% (growing from roughly 201 to 342 dwellings). Adding another 50 homes would result in a 95% total increase since 2015, effectively doubling the size of the village in a short period.
- Wick has already made a substantial, repeated contribution to the Vale's affordable housing supply, with 61 affordable units delivered recently across the St James Gardens and Wales & West Housing sites. Introducing a third major affordable housing development is a disproportionate burden for a small village, and the Council should look to other rural locations that have not seen any growth for some considerable time and would benefit from provision.
- The rapid scale of recent and proposed building threatens Wick's rural character, identity, and appearance, placing the village in danger of losing its rural setting and becoming a sprawling housing estate. Furthermore, allocating this land could invite future developers to extend the village even further into the open countryside.
- While the general need for affordable housing is acknowledged, the proposal conflicts with national planning policy, national sustainability goals, and the RLDP's own spatial strategy. The allocation represents an unjustified, unsustainable "unplanned add-on" rather than development that is proportionate to the settlement's scale.

- Local feedback shows a clear preference regarding scale: 47% of residents prefer no additional housing at all, while 41% would support small-scale development of fewer than 20 homes. A 50-unit allocation is disproportionately large and directly conflicts with the community's view that any future growth must be small-scale to reflect the village's capacity.

Council Response

The historical growth and the specific figures provided regarding the expansion of Wick over the last decade are acknowledged.

The RLDP spatial strategy does not look at past housing delivery in isolation or focus solely on a single period of growth. The RLDP looks forward to address future housing needs across the Vale.

While the cumulative growth of Wick since 2015 is recognised, the proposed allocation is not an 'unplanned add-on'. The site has been subject to candidate site assessments, an independent Integrated Sustainability Appraisal (ISA), and viability assessments to ensure that Wick can accommodate the proposed number of homes. This includes evaluating infrastructure capacity, highways safety, and impact on landscape and character, ensuring that any future growth is managed, policy-compliant, and delivered alongside necessary infrastructure enhancements. Meanwhile, the ISA ensures that the site is in conformity with the principles of placemaking and Planning Policy Wales (PPW) by evaluating sites against PPW's sustainable placemaking outcomes and transport thresholds.

The site is also in conformity with the RLDP's spatial strategy. Objective 4 of the Sustainable Growth Strategy explicitly refers to allowance for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of the settlement. Policy SP2 builds on this to specify that "*small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of up to 25 dwellings in Minor Rural Settlements or up to 50 dwellings in Primary Settlements*". The site fits within this description and is therefore compliant with the RLDP's Sustainable Growth Strategy.

The comment regarding the distribution of development across the Vale's other rural settlements is noted.

The RLDP's housing allocations are guided by sustainability framework, the local evidence base and the specific candidate site submissions received by the Council. The RLDP should only allocate sites that are demonstrated to be deliverable and the availability of sites, as demonstrated by a candidate site submission, is a key factor in deliverability. While the Council evaluates all potential rural settlements where sites have been submitted, allocations are directed to locations that demonstrate the highest balance of sustainability,

accessibility, and infrastructural resilience, alongside local housing need. The proposed development supports and is reflective of Wick's role as a Primary Settlement in the RLDP's settlement hierarchy.

Regarding concerns over future expansion into the open countryside, any allocated site will have defined settlement boundaries established within the RLDP. Land outside of these boundaries will continue to be designated as open countryside, where strict national and local planning policies apply to protect it from speculative or inappropriate development for the lifespan of the RLDP.

Issue – Loss of green space

- This proposal would damage Green Wedges and Green Infrastructure and represents unnecessary countryside development. It extends the settlement into open countryside, eroding its form and rural approach.
- The site lies within a green belt area, and its development at this scale fails to protect and enhance and is incompatible with the existing rural landscape.
- The site would also create significant landscape and visual harm.
- The proposed addition of 50 houses on this edge of Wick would fundamentally alter its rural character, eroding residents' quality of life by replacing valued open green space and informal community land with an enclosed, overdeveloped settlement.
- Development should prioritise brownfield or well-located sites near existing urban areas with suitable infrastructure.
- The field is also used informally for recreation—walking, dog walking, children's play and exercise—which would be lost to the community.
- The Community Council requests confirmation that environmental constraints and landscape impacts have been fully assessed within the site selection process.
- Expansion of this nature is more appropriately directed toward larger, better-connected settlements within the county.

Council Response

It is important to clarify the distinction between a Green Belt and a Green Wedge. A Green Belt is a regional-level strategic designation, with broad areas for consideration identified in Future Wales. In contrast, Green Wedges are local designations by Local Planning Authorities with the purpose of preventing settlement coalescence. The Council notes that the site is not located within an area under consideration for a Green Belt, nor is it within a Green Wedge in either the adopted LDP (2011-2026) or the RLDP (2021-2036).

Informal access to a private field does not designate it as formal or protected public open space. The Open Space Background Paper (BP31) sets out the statutory framework for protecting and providing open space. Any development of this scale will be required to

integrate high-quality, multi-functional Green Infrastructure directly into the layout, contributing to net biodiversity gain and local well-being.

In response to Wick Community Council's request, the Council confirms that all allocated sites have undergone a comprehensive Candidate Site Assessment process.

The site was also subject to an Integrated Sustainability Appraisal (ISA). The ISA evaluates site specific constraints, including Special Landscape Areas (SLAs), historic assets, biodiversity, and visual impact. Sensitive landscaping and site layouts will be required and assessed at the detailed planning application stage.

In relation to concerns regarding greenfield development, a key component of the RLDP Strategy is "Allowing for regeneration opportunities on previously developed and underutilised land." However, there is limited deliverable brownfield land available in appropriate locations, resulting in the RLDP being required to consider greenfield sites.

While it is recognised that 'unplanned' or un-structured' growth of settlements is generally resisted by Planning Policy, the Development Plan is the appropriate mechanism to assess and deliver structured growth- resulting from an assessment of visual impact, housing need and many other material planning considerations. It is considered that this site delivers an appropriate level of growth, where loss of greenfield land has been balanced against housing need.

Issue – Lack of Services

- Wick lacks the services to support such growth.
- We understand the local school, which has been recently enlarged to cope with current demand, have not been consulted directly on this issue either.
- The rural Vale's emergency services—including police, fire, and ambulance resources—are configured for a dispersed population, meaning that adding new housing without corresponding investment or planning evidence will place a further strain on these already stretched local provisions.
- For such a large increase in housing for a small village, sufficient extra investments in local services are required. There is no local NHS GP or dentist; residents rely on nearby towns which will face extra strain. Limited retail provision, with only one small shop and one public house serving the community. A small sports or community centre is needed. A single primary school facing extra strain including from other villages in its catchment area, with no evidence that additional capacity has been assessed or planned for. The proposal does not demonstrate how these deficiencies would be addressed, nor does it provide evidence of sustainable long-term service provision.
- There is no secondary school or GP surgery within the village, and many residents rely on nearby towns such as Bridgend, Llantwit Major and Cowbridge for

employment, healthcare and everyday services. Continued expansion risks increasing reliance on private car travel and may not align with the sustainability objectives set out in national planning policy.

- The candidate site assessment gave a Red rating for Access to Health Services, reflecting the limited proximity of the village to healthcare facilities. While travel to services may be necessary in rural areas, additional housing growth should still be supported by evidence that local healthcare provision has the capacity to accommodate it. The Deposit Plan does not appear to include confirmation of GP capacity, agreement from the relevant Health Board, or identified mitigation measures.

Council Response

With regards to the school, the RLDP is informed by an Education Background Paper (BP43) which evaluates whether existing school capacity can meet future demand, or whether new or extended facilities are needed and how they can be delivered. The paper covers nursery, primary, secondary and Additional Learning Needs (ALN) provision in Welsh-medium, English-medium, and denominational education.

BP43 forecasts that 10 primary school pupils will be generated from the development and 8 secondary school pupils. At primary school level, based on previous trends, 8 pupils are forecast to wish to attend Wick and Marcross CIW. When other developments are factored in (due to demand from a wider area for denominational education as Wick and Marcoss is a Church in Wales school), there would be a total demand for 24 new pupil places at Wick and Marcross CIW. The background paper concludes that this minimal demand can be met through admission arrangements.

The proposed allocation would also generate need for two additional primary school spaces at Ysgol Dewi Sant Welsh-medium, 1 additional secondary school space at Ysgol Y Deri ALN, and 7 additional secondary spaces at Llantwit Major English-medium.

While Wick and Marcross CIW have not been directly consulted, the Council's Education department have been directly consulted in order to identify education capacity needs arising from proposed development in the RLDP. The Education department also circulated information on the RLDP consultation with schools across the Vale via the ConnectED bulletin.

Emergency services have been consulted on this site and the wider Plan in general at various stages of the RLDP process. This includes South Wales Police, South Wales Fire and Rescue Service, and the NHS (who oversee Welsh Ambulance Services NHS Trust). No objections have been raised by these stakeholders and the development is subsequently considered capable of being accommodated by these emergency services. If any issues are identified are

planning application stage, Section 106 (S106) funding may be sought to mitigate such issues.

While it is recognised by the Council that there is no secondary school or GP surgery within Wick and that with many residents relying on nearby towns for employment, healthcare and some everyday services, this is reflective of Wick's role in the RLDP's Settlement Hierarchy. Wick is designated as a Primary Settlement, recognised for its baseline of local services (primary school, local shops, etc.) to support the wider rural Vale, but is still expected to rely of Key Settlements and Service Centre Settlements like Barry, Llantwit Major and Cowbridge for wider needs such as secondary education, healthcare and major employment. Conversely, Service Centre Settlements are expected to support villages like Wick which lack certain services and facilities. The proposed development of 50 houses is considered appropriate in proportion to Wick's status as a Primary Settlement outside the Strategic Growth Area, and residents have the option of travelling by bus to get to places like Llantwit Major and Bridgend where more facilities exist.

It has been highlighted that this site in Wick scored 'red' for access to health services, in the candidate site assessment. The candidate site assessment notes that the nearest surgery to the site is located within Llantwit Major, over 2 miles from the site. The candidate site methodology scores sites as red if they are not within 1000m of a health facility.

In preparing the Deposit Plan, and with regard to comments on GP capacity, reaching agreement with the relevant Health Board, and identifying necessary mitigation measures, the Council has worked closely with the Cardiff and Vale University Health Board (CAVUHB) to identify the potential demands of new development and forecast population demographics of the Vale of Glamorgan on health services over the plan period to 2036. This has involved CAVUHB undertaking a review of existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan period, and potential impact on health services where key housing sites area identified within the Deposit Plan. This assessment is contained within Background Paper BP37 - Primary, Community and Intermediate Health Care.

The assessment recognises that there are projected increases in population, and changes in the age structure of the residents within the Vale of Glamorgan, and this forms part of the Health Board's own service planning strategies. CAVUHB undertakes a 6 monthly review of its estate's capacity, providing an updated, locality-based view of estate utilisation, highlighting current challenges, and identifying opportunities for improvement.

BP37 indicates that Primary Care General Medical Service (GMS) provision/capacity across the Vale is currently profiled 'Amber' reflecting high levels of planned growth and limits to existing capacity. However, CAVUHB has identified opportunities to address this through strategic schemes, collaborative investment, and innovative service models. These include

integrated wellbeing solutions, other funding sources, and the development of new facilities in partnership with local authorities.

In the Central and Western Vale cluster, which includes Wick, CAVUHB have advised that these areas show potential for growth, with several large or purpose-built premises offering opportunities to expand capacity. However, this in contingent on securing necessary investment.

General Dental Services (GDS) are commissioned based on need in line with policy direction and funding allocation from Welsh Government. Significant contract reform is ongoing, with a new contract implemented from April 2026. BP37 highlights that GDS is an area of attention, and that there are workforce challenges in this sector.

The Council shall continue to work with CAVUHB advising them when and where future housing development will take place so as to inform service planning and provision. Ongoing engagement throughout the RLDP preparations and formal consultation on planning applications will explore opportunities for the provision of health facilities. This could include the identification of land for new health facilities or multi-use community facilities as well as financial contributions towards community facilities.

Issue – Infrastructure

- Concerns over impact on a small village and site access impacting surrounding infrastructure. There would need to be a compete infrastructure plan with agreement it would not impact current residents.
- Wick lacks the infrastructure to support such growth.
- Having looked at the current sewage, water, electricity, wifi infrastructure of our village, this is a totally an unrealistic proposal.
- Extra strain on public services such as Power, Drainage, Water, etc.
- A key concern raised through community engagement relates to infrastructure capacity. Survey responses indicate that:
  • 73% consider existing infrastructure to be inadequate or very inadequate
  • 90% believe infrastructure improvements should be delivered prior to or alongside development.
- While it is recognised that some detailed matters are addressed at planning application stage, allocating land within the Local Development Plan should normally be supported by reasonable certainty that the necessary infrastructure can be delivered during the Plan period.
- The Community Council requests clarification on the evidence supporting the capacity of existing infrastructure and how any necessary upgrades would be delivered and funded.
- The Community Council requests clarification of the evidence supporting the allocation and its proportionality within the settlement strategy.

- The existing local amenities and infrastructure cannot cope with the cumulative impact of an additional 50 homes. There is no clear indication of how infrastructure will be upgraded to support this sharp population increase, nor is it clear if the LDP enforces specific percentage constraints on population/housing increases for a single settlement over a set period.

Council Response

The Vale of Glamorgan Council acknowledges the concerns raised regarding infrastructure capacity. The RLDP is informed by an extensive evidence base, which includes an Infrastructure Plan background paper (BP44). This paper lists the key infrastructure requires any development on site must deliver, such as financial contributions towards additional English Medium secondary provision, sustainable transport and active travel, community facilities, green infrastructure, water supply and sewage, recreational open space, and drainage.

All proposed allocations, including Land at Heol Fain, have been subject to viability assessments (Covered in BP42 Viability Assessment Background Paper) to ensure that the identified necessary infrastructure requirements can be met and fully funded.

Necessary upgrades will be funded by the developer by way of Section 106 (S106) agreements. Upgrades such as for schools, community facilities and sustainable travel will mostly be delivered by the Vale of Glamorgan Council using these S106 contributions. The developer will however be required to deliver on-site infrastructure such as drainage, recreational open space and green infrastructure.

While it is appreciated that the public understandably wants infrastructure built before any houses go up, S106 planning obligations are legally tied to the development itself. S106 funding therefore does not exist until the developer starts building and selling homes. However, trigger points for funding will be agreed at planning application stage so that certain funding can be released alongside development where viable.

Regarding concerns for the water, electricity, sewage and wi-fi infrastructure in Wick, all relevant stakeholders have been consulted on this site and the wider Plan in general at various stages of the RLDP process. This includes National Grid, Dwr Cymru Welsh Water (DCWW), and broadband providers. Objections have not been raised by these stakeholders and the development is considered capable of delivering an acceptable standard of infrastructure in this regard.

The Council notes the specific context regarding the existing 120-home estate and the scale of the proposed 50-dwelling allocation. While the addition of 50 homes represents a notable increase in proportion to the existing estate, the threshold for highway capacity and safe access is determined by vehicular capacity and design standards rather than a fixed

percentage growth limit. Infrastructure and Highways capacity have been considered in BP44 Infrastructure Plan and BP14 Strategic Transport Assessment, in addition to BP118 Candidate Site Assessment at Preferred Strategy Stage and BP18A Candidate Sites Assessment at Deposit Plan stage.

Issue – Residential Amenity and Public Health

- According to the UKRadon web site, the area is regarded as having Elevated Radon Potential. Unless effectively managed during construction, this could be detrimental to other residents who might suffer from lung conditions such as COPD.
- This proposal does not reduce rural isolation.
- The Council must prioritise protecting current residents from the noise, light pollution, injury risks, and loss of natural light caused by the close proximity and elevation of the proposed new builds.
- Some properties of the current estate will be overshadowed and overlooked by new properties with a possible loss of light.

Council Response

The presence of elevated radon potential is a geological characteristic across parts of the Vale of Glamorgan and does not preclude the allocation of land for development. Radon protection is regulated by statutory Building Regulations (Part C), which require specific protective measures in the design and construction of all new dwellings within identified risk areas.

Regarding rural isolation, Wick is designated as a Primary Settlement due to its level of local services and facilities that can support the everyday needs of the surrounding rural area. Delivering affordable housing within the village helps local families and young people to remain in their community rather than being displaced to larger settlements. The development can also strengthen the critical mass required to sustain Wick's existing services and facilities.

While these concerns regarding risk of injury, noise pollution and light pollution are acknowledged, these are standard development management considerations that can be effectively mitigated during the detailed design and planning application stages.

Any planning application for this site will be required to follow council-approved supplementary planning guidance regarding design, including minimum privacy distances. These requirements ensure that unacceptably intrusive overlooking and overshadowing is prevented.

Furthermore, any application for development on this site will be required to submit a Construction Method Statement (CMS) to set out and agree the necessary safety measures needed during the construction stage, following a risk assessment.

Similarly, concerns regarding potential noise and light pollution can be mitigated through engineering solutions and enforceable planning conditions. The final site layout will be required to integrate appropriate green infrastructure, for example hedgerow reinforcement or strategic tree planting. This can provide both a physical and visual buffer that absorbs daily residential noise and breaks up sightlines. Detailed matters regarding the potential of light pollution will be addressed at planning application stage, where planning conditions can be implemented to mitigate these issues if necessary.

Finally, because the site is allocated for residential use, the ambient noise generated will be entirely compatible with the existing residential character of Wick and will not introduce disruptive noise levels into the area.

It is therefore considered that these issues do not warrant the deletion or rejection of the proposed site allocation, as planning mechanisms will be used to mitigate any unacceptable negative impacts on residential amenity at planning application stage.

Issue - Candidate Site Assessment

- What planning and site assessment criteria led to the identification of land east of Heol Fain as suitable for allocation?
- Two years ago the Council deemed that this land was unsuitable for building properties so what has changed? How does this decision align with earlier plan-making stages where the site was not progressed?
- Site has already been rejected twice for development which strongly suggests its unsuitability.
- Consideration of this site for development is inconsistent with the decision made by the LPA to remove it from the current development plan 2011-2026. People have a right to expect consistency from the LPA from one development plan to the next.
- Can the Vale Council explain why it has removed site 355 from the RDLP in favour of 404?
- The Council's own Candidate Site Stage 2 Assessment Register (November 2023) indicates that market-led housing would not be acceptable in this location. The same assessment states that development might only be reconsidered as small-scale affordable housing subject to evidence of need and viability. Allocating the site within the Plan therefore appears premature when this evidence has not been clearly demonstrated.
- The Council's Candidate Site Summary identifies the site as Red for Climate Change and Red for Access to Health Services, with several infrastructure criteria rated Amber. These ratings suggest significant sustainability concerns. However, the Deposit Plan documentation does not appear to clearly explain the basis for these ratings or demonstrate how the impacts identified would be mitigated.
- During previous candidate site assessments, the Council explicitly deemed land to the east of Heol Fain (Site 404) as "not suitable for further consideration," "not suitable for small-scale affordable housing led development," and "not suitable for a market-led scheme." The reasoning behind reversing this position and selecting this site within the broader strategic framework of the RLDP's spatial strategy needs clarification.

Council Response

The planning and site assessment criteria that led to the identification of Land at Heol Fain, Wick, as suitable for allocation is contained within Background Paper 16 – Candidate Site Methodology (June 2022).

Land at Heol Fain, Wick, initially failed the first Call for Candidate Sites when it was proposed for market-led housing. BP18 (Candidate Site Assessment at Preferred Strategy Stage)

contains the Council's reasoning behind the decision not to progress candidate site 404. It states:

> *Site is outside of the strategic growth area and is not proposed for small scale affordable housing led development within a primary settlement. 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.*

Land at Heol Fain, Wick, was then submitted for affordable-led housing at the second Call for Candidate Sites, and was subsequently considered suitable for allocation. Background Paper 18A (Candidate Sites Assessment at Deposit Plan Stage) contains the Council's reasoning behind the decision to allocate the site. It states:

> *The site was previously ruled out as it is outside of the strategic growth area and is not proposed for small scale affordable housing led development within a minor rural settlement. The site has been resubmitted for an affordable housing led scheme. The previous assessment considered that, in accordance with the Settlement Appraisal Review, Wick could potentially accommodate limited affordable housing led growth. The 2023 LHMA indicated that the ward of St Brides Major has a need for 124 additional affordable units over the next 15 years and this site could make an important contribution in meeting that.*

For clarity, Candidate Site 355 (Land West of St Brides Road) is situated to the north of Candidate Site 404 (Land at Heol Fain). Both sites 355 and 404 were rejected at the first stage Candidate Site Assessment when submitted for market-led housing. Both sites were then resubmitted as Affordable Housing Led sites at the second Call for Candidate Sites, referred to as Candidate Site 4059 (previous site reference 355) and Candidate Site 2814 (previous site reference 404). Candidate Site 4059 was rejected, meanwhile Candidate Site 2814 has been proposed for allocation.

Both sites were deemed suitable in principle for further consideration in Wick. The sites are adjacent to each other and have similar characteristics insofar as they are greenfield flat sites adjacent to new build housing. However, it is considered that Site 2814 (Land at Heol Fain) better reflects the existing pattern of development in the village and would be a more appropriate rounding off. Allocating both sites was considered inappropriate due to the excessive scale of development it would introduce.

With regard to the candidate site assessment, it indeed scored red for climate change and for access to health services. It scored red for climate change because the development proposed no additional low or net zero carbon measures above the mandatory building regulations. It scored red for 'access to health services' due to being over 1000m away from the nearest GP surgery. The sustainability of the development location is judged on balance

with a number of other material planning considerations. Wick is considered a sustainable location for minor growth corresponding to its role in the Settlement Hierarchy as a Primary Settlement.

It has been raised by a representor that the candidate site assessment for Candidate Site 404 stated "*not suitable for further consideration*," "*not suitable for small-scale affordable housing led development*" and "*not suitable for a market-led scheme*". It is important to note that the Candidate Site Assessment at Preferred Strategy Stage (Background Paper – BP18) explicitly states that "*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*". The assertion that the assessment ruled out development for affordable housing led development is therefore inaccurate.

Issue – Affordable Housing Need

- There is already high number of affordable homes in area. The affordable housing provision has been met as in the last 10 years, 43% of homes built in Wick have been affordable whereas an additional 50 homes would increase this to 58%. How can there be any further demand for affordable homes in Wick when that demand has already been met with the construction of 61 affordable homes at St James Gardens (44) and St. Brides Road (17)?
- No Wick-specific housing needs assessment has been presented to demonstrate that development of this scale is proportionate to the village's size, character and infrastructure capacity. Affordable housing need does not automatically justify this oversized development of Wick.
- Vale Council website states "Properties with an LLP are allocated in a DIFFERENT way to properties available for bids through the Homes4U scheme. Applicants in the first instance are prioritised in line with the specific LLP. Applicants with the strongest connections to the community are given the highest priority. Applicants within the highest priority band are then prioritised in line with the Homes4U Policy. In the unlikely event that there are insufficient applicants who fall within Priority 1, 2 or 3, then lettings sales can be extended to Homes4U for applicants who live or work anywhere in the Vale area." However, St James Gardens Properties and those in the new development Clos y Stabl, have virtually all been advertised on Homes4U for bidding, proving there is no "local need" for properties for local people, otherwise why are they being advertised openly?
- Of the 19 homes made available in the last 4 months, 17 of these applications had to be advertised on Homes4U because applicants did not meet the necessary local requirement. Advertising on Homes4U can only happen when the requirement under priorities 1 to 5 below could not be met: Resident in the community of Wick for the last 12 months; Previously resided in the community of Wick for a minimum of 5

years; Parents or close family living in Wick; Permanently employed (or moving to be permanently employed) in Wick; Retiring from tied accommodation in Wick.

- The survey by Wick Community Council highlighted support for affordable housing where it prioritises applicants with local connections. The Community Council therefore asks that, should development proceed, consideration is given to mechanisms which prioritise local connection criteria where consistent with housing policy.
- While residents are generally opposed to large-scale development, there is some openness to smaller-scale schemes of fewer than 20 homes.

Council Response

While the objection notes the significant volume of affordable housing delivered locally over the past decade, housing need is not calculated or restricted to an individual settlement level. In accordance with the Local Housing Market Assessment (LHMA) methodology, affordable housing need is robustly assessed and judged at the ward level, rather than by individual settlement boundaries.

The LHMA identifies an ongoing need of 124 affordable homes within the St Brides Major ward, in the next 15 years. Past delivery at St James Gardens and St. Brides Road has successfully contributed toward meeting historic targets, but it does not eliminate the newly identified shortfall across the wider ward area.

Wick is designated as a Primary Settlement within the RLDP's settlement hierarchy. Primary Settlements are identified as such because they possess a baseline of services and a level of sustainability that makes them more resilient to growth than smaller, more isolated rural villages. Wick is therefore the best-positioned settlement within the St Brides Major ward to accommodate and contribute to the ward's affordable housing need.

Support from the Wick Community Council survey is noted, regarding the provision of affordable housing for individuals with local connections. The Vale of Glamorgan Council utilises a Local Lettings Policy (LLP) to allocate affordable housing. LLPs are developed by and agreed in partnership with the Council, the Housing Association and the Community Council who represent the residents of the community in which the properties are being developed. While there is some minor variation between LLPs, the core framework remains the same so that applicants with the strongest connections to the community are given the highest priority.

As an example, the LLP for Clos Y Stabl, Wick, gives first priority to applications with a local connection to the Wick Community Council Area (either resident of Wick for the last 12 months; previously lived in Wick for a minimum of 5 years; parents or close family living in Wick; permanently employment in Wick; or retiring from tied accommodation in Wick). Priority 2 is given to applicants with a local connection to the ward of St Bridges Major, while

priority 3 is then for applicants with a local connection to the rest of the Rural Vale. In the unlikely event that there are insufficient applicants who fall within Priority 1, 2 or 3, then lettings can be extended to applicants living or working anywhere in the Vale of Glamorgan.

The openness to smaller-scale schemes of fewer than 20 homes is acknowledged. However, to meet the demand for affordable housing in the St Brides Major ward, it is considered appropriate on balance to allocate this site for up to 50 dwellings. It should be noted that the allocation of larger sites allows the Council to secure essential community benefits and infrastructure improvements through developer contributions, allowing for sustainable growth.

The Council's Housing department have been consulted regarding the assertion that housing in Wick has been advertised on Homes4U. The Housing department were able to confirm that all applicants had connections to Wick that were evidenced, apart from 3 who has evidenced connections to the Rural Vale. The subsequent relets at St James', were all allocated to applicants with a local connection to Wick. It is important to note that the expressions of interest properties are advertised through the Homes4u advert, so they will appear on these lists.

Issue – Sustainable Transport

- Wick lacks the transport to support such growth.
- Rural villages like Wick are not suitable for affordable housing because they are characterised by poor public transport.
- National planning policy in Wales places strong emphasis on decarbonisation, sustainable placemaking and reducing reliance on private car travel. Where a site is identified as performing poorly against climate objectives, it would normally be expected that clear evidence and mitigation measures are provided to justify its allocation. In this case, that justification is not evident within the published documentation.
- Public transport is limited, with only one bus per hour and no direct service to Cowbridge, where the nearest GP surgeries are located. There is no rail travel. No active travel or safe pedestrian routes support movement for those without vehicles. Increased reliance on private cars contradicts both national policy and the Vale of Glamorgan's sustainable growth objectives.

Council Response

Accessibility to sustainable travel has been factored into candidate site assessments.

An hourly bus services gives residents opportunities to sustainably travel to Bridgend and Llantwit Major where GP surgeries are located. In addition, all local authorities in Wales have to produce maps of walking and cycling networks in their local area, known as Active Travel Network Maps (ATNMs). The ATNM identifies a future cycling route between the Wick and

Llantwit Major (referenced Future 047A), though this scheme has not yet progressed to date.

While it is acknowledged that the settlement of Wick has limited options regarding sustainable transport in comparison to Key Settlements and Service Centre Settlements, the principle of acceptability of developing the site has been weighed on balance against other material planning considerations.

One of the key considerations relevant to this site is the local affordable housing need. Wick falls within the St Bridges Major ward, where an affordable housing need of 124 between the period over 15 years. It is important to note that this site could make a significant contribution towards this affordable housing need. It is for this reason that the site was initially rejected as a candidate site for market housing, but has been proposed for allocation when submitted as an affordable-led site.

Furthermore, it should also be noted that the RLDP introduces a suite of net zero and renewable energy policies set out within Section 6: Climate Change and Transition Towards Net Zero of the Deposit RLDP, which can contribute to mitigation against any potential carbon performance limitations of a site. These policies require that all new developments must be built to the highest standards of environmental design and performance, and that operational development must incorporate active design measures to mitigate and adapt to the impacts of climate change. This aligns with the Council's Project Zero aspirations and the Local Area Energy Plan (LAEP).

The Council also operates the Greenlinks Community Transport scheme, which provides demand-responsive transport across the rural Vale of Glamorgan. Greenlinks offers a practical and affordable solution for residents who may have difficulty accessing essential services and amenities. The scheme operates a fleet of accessible minibuses and cars which can be booked.

It is acknowledged that Wick is not as sustainable as larger settlements in the Vale. It does not have as extensive a range of services, and sustainable linkages are acknowledged to not be as strong as within the larger settlements. Consequently it would not be appropriate to direct strategic allocations to this location in the current policy context. However, the size and nature of the proposed allocation is reflective of critical affordable housing need in the Vale, and identified Housing need locally. The issues and specifics relating to the level of affordable housing need are discussed in this report, however, it is considered that the size of proposed allocation represents an appropriate balance between housing need, and the sustainability of the location which, as noted above, is served by a number of important services.

Issue – Settlement Hierarchy

- Given Wick's status as a minor rural settlement, countryside protection and creeping village expansion have to be considered. It should be more suited to towns and strategic growth areas.
- During the Preferred Strategy stage of the RLDP, Wick was identified as a Primary Settlement Area. During the consultation period there was no formal notification from Vale Council with Wick Community Council or elected members of St Brides Major ward to explain why this decision was made. Subsequently, the opportunity for consultation with the community and raise objections to this proposal could not happen.
- The allocation appears inconsistent with the Plan's overall spatial strategy. The site lies outside the strategic growth area.

Council Response

To clarify the first point referring to Wick as a minor rural settlement, Wick was minor rural settlement in the adopted LDP but has been elevated to Primary Settlement in the RLDP since the Preferred Strategy which was consulted in from December 2023 to February 2024. However, Wick remains outside the Strategic Growth Area, making it one of three Primary Settlement Areas to exist outside the strategic growth area alongside Wenvoe and Culverhouse Cross.

To inform the RLDP, the Council has undertaken a review of its originally settlement appraisals which was first carried out in 2016 for the adopted Vale of Glamorgan adopted LDP. Since carrying out the review in 2016, a regional methodology has been developed by the 10 local authorities that form the South East Wales Strategic Planning Group (SEWSPG), establishing a common methodology for settlement appraisals, adapting this methodology to better reflect the character the Vale. This saw replacing the regional measure of the presence of active travel with a measure to the distance to key services and facilities (e.g. health facilities, schools, and retail centres) from smaller settlements, providing a more appropriate means of measuring accessibility between settlements. In addition, population estimates were updated to reflect changes in settlement growth and average household sizes were revised to take account of the 2021 census data.

In adopting the regional methodology this has resulted in changes in the ranking of settlements, including several settlements being recategorised, namely Culverhouse Cross and Wick have changed to Primary Settlements (previously Minor Rural Settlements), whilst Southerndown has been reclassified from a minor rural settlement to a smaller rural settlement. Further detail of the methodology and ranking of settlements is set out in Background Paper 5 Settlement Appraisal Review.

In ranking settlements, the appraisal acknowledges that within each settlement category there are differences between each settlement (as reflected in the ranking and

scoring). Nevertheless, the appraisal considers that the services, facilities and linkages within each settlement reflects their settlement category when assessed against the methodology, which has been applied consistently across all settlements including the recategorising of Wick as a Primary Settlement.

Throughout the RLDP process, a structured series of engagement events have been conducted with Town and Community Councils. This included a targeted session in February 2023 focusing on growth and spatial options. During this session, the outcomes of the Sustainable Settlement Appraisal were presented, which highlighted changes to Wick's position within the settlement hierarchy.

Council records indicate that no representatives from Wick Community Council attended this specific presentation. However, all Town and Community Councils were provided with a briefing note prior to the session summarising the findings of the appraisal review. Furthermore, a follow-up communication was issued to seek the views of any councils unable to attend.

A subsequent briefing was arranged in November 2023 for Town and Community Councils. This session outlined the RLDP strategy and presented the RLDP Key Diagram, which explicitly illustrated Wick's designated position within the settlement hierarchy.

Wick Community Council was engaged as a statutory consultee during the formal consultation on the RLDP Preferred Strategy, which took place between December 2023 and February 2024. The Preferred Strategy contained a dedicated policy on the Settlement Hierarchy, and *Background Paper 5: Sustainable Settlements Appraisal* was concurrently published for public comment. The Preferred Strategy and its supporting background papers have remained publicly accessible on the Council's website since the launch of the 2023 consultation.

In addition to the representations submitted by the Welsh Government, one formal representation was received during the Preferred Strategy stage regarding the settlement hierarchy for Wick. This representation expressed explicit support for the elevation of Wick to a Primary Settlement.

Issue – Employment

- Rural villages like Wick are not suitable for affordable housing because they have very few employment opportunities.
- Does not provide local employment opportunities.

Council Response

The settlement of Wick has local employment opportunities at Vale Business Park, Llandow Trading Estate, Llandow South and Dyffryn Business Park. Further, the Deposit Plan proposes to allocate land at Vale Business Park, Llandow Trading Estate and Dyffryn Business Park to

expand each of these employment areas respectively. Wick also has good access via sustainable transport to Service Centre Settlements such as Cowbridge and Llantwit Major, where a range of employment opportunities exist. Furthermore, Wick benefits from good accessibility via sustainable transport to Bridgend. Consequently, the settlement is well-positioned to provide residents with sustainable access to a diverse range of local and regional employment opportunities.

Wick's role as a Primary Settlement is to complement the role of the Service Centre Settlements, providing for the needs of residents and the surrounding wider rural areas, while also offering several key services and facilities, reducing the need to travel to Barry or the Service Centre Settlements to address day-to-day needs. The provision of affordable housing within Wick is therefore considered sustainable and essential to meet local housing needs, ensuring that rural communities remain economically viable and that individuals working within the rural economy have the opportunity to live near their places of employment.

Issue – Settlement Boundary Review

- Amending the Wick settlement boundary to include land at Heol Fain (4.19) is justified by the RLDP housing allocation, not the settlement's logical extent. This risks creating a circular rationale, where the boundary is extended to accommodate the site, making the allocation seem more acceptable. Settlement boundaries should reflect established built form and defendable limits, not be extended primarily for development sites. Such an approach could undermine the boundary's purpose and pre-judge the site's suitability, rather than assessing it on its planning merits.

Council Response

The assertion that the amendment to the settlement boundary at Heol Fain relies on a circular rationale misinterprets the sequential methodology utilised in the plan-making process. The assessment of candidate sites and the amendment of settlement boundaries are separate processes, in that the boundary amendment is a consequence of the proposed allocation, not its justification.

In accordance with standard development plan methodology, the site at Heol Fain was first subjected to a rigorous, independent planning assessment through the Candidate Site process. This assessment evaluated the site's suitability, deliverability, and alignment with the Preferred Strategy on its own merits, independent of the existing settlement boundary. Only after the site was deemed suitable for allocation was the decision made to amend the settlement boundary.

Amending settlement boundaries to include newly allocated sites is standard planning practice. It ensures that the boundary accurately reflects the planned, logical extent of the built form over the plan period and provides a clear and defendable limit for development

management purposes once the plan is adopted. Consequently, the site's suitability was not pre-judged by the boundary change; rather, the boundary amendment is the next logical step to integrate the proposed allocation into the settlement.

Issue – Flooding and Drainage

- Area subject to flooding.
- Increased flood risk from building on grassland which currently provides natural drainage and run off for rainwater. The proposed field is currently used for surface water drainage from the nearby St James estate. Development risks; a) reducing the land's natural drainage function and the sustainable draining via the reed bed, b) Increasing surface water runoff into a small stream along Heol Fain that regularly exceeds its boundaries in wet weather, c) Creating wider environmental impacts that have not been addressed.
- Site has very poor drainage and a pumping station in situ.
- Current wastewater treatment facility is not scaled to cope with an expansion of housing on the proposed scale.
- The St James Gardens development has problems with drainage which have not been resolved and the system has not been adopted by Dwr Cymru.
- Developing this low-lying, naturally wet field without a detailed drainage assessment risks flooding neighbouring properties.
- The adjacent housing development approved under the previous LDP included a requirement to investigate the potential for sustainable drainage systems and the suitability of soakaways for surface water disposal. Development of the remaining portion of the field could potentially affect those drainage assumptions. In the absence of detailed drainage evidence within the Plan documentation, it is difficult to be confident that development could proceed without creating flood risk or surface water issues for neighbouring properties.

Council Response

Data from Natural Resources Wales's (NRW) Flood Map for Planning indicates that Site HG1 (9) is located outside of any designated Rivers and Sea flood zones. While there is a small patch of Surface Water and Small Watercourse flood zone 3 near the southern boundary, the map does not show any presence of Small Water and Small Watercourse flood zones within the site itself.

Any application will be required to be accompanied by a drainage strategy which will be assessed by the Council to ensure that it would not cause any increase to the risk to local amenity and safety as a result of flooding.

While an objection has been raised that developing the site will reduce the land's natural drainage, a benefit of development on this site is the implementation of Sustainable Drainage Systems (SuDS). Currently, surface water flows naturally and uncontrolled, which

can contribute to runoff depending on topography. By allocating this site, any future development will be required to engineer drainage solutions, such as swales and attenuation basins, that collect and store water safely on-site. This controlled approach is designed to ensure that runoff rates do not exceed "greenfield" levels and, in many cases, can actually improve the current situation for neighbouring properties.

It should be noted that the pumping station in situ referenced in the objections is not related to drainage of the site, but the local sewerage network. Dwr Cymru Welsh Water (DCWW) have been consulted regarding this site, and throughout the RLDP process, and have confirmed that the public sewerage network can accept potential foul flows from this development site, and that Wick Wastewaster Treatment Works has capacity to accept foul flows from the proposed development. The Council will continue liaise with DCWW as the site progresses the application stages.

Issue – Land stability

- In July 2015 Barratt plc started development on the site with permission for 124 dwellings. They constructed an installation to dispose of the surface rainwater, away from their development site. The drainage installation is centrally placed to the west side of this site which is this proposal for a further 50 dwellings, adjacent to Heol Fain.
- Since installation of the drain, Heol Fain no longer floods. A sink hole currently approx. 40'(12m) diameter and 3'6‖ (1.2m) deep, first appeared in the field to the west of Heol Fain, adjacent to roadway, opposite the site drain Barratt had installed. It is increasing in size and depth each year.
- Currently there is no threat to any dwelling as none are located near the underground cavity.
- A geological survey of Sep 2015 based on drilling bore holes to a depth of 105' (30m) on behalf of Barratt showed that most of the site was impervious to rainwater and stated — the test results across most of the site suggest there is typically limited or no potential for infiltration.
- Drainage of surface water was achieved via a drain close to Heol Fain. At the site of the subsequent drain installation, the bore hole test report states the result —Unable to induce a head of water ….due to rapid infiltration rate (1,000 litres used)." 1 The testers had attempted to fill the drilled test hole with water and then measure how far the level dropped over a given period of time. Instead, at this location, despite pumping 1,000 Litres in very quickly, the hole would not fill. They had drilled through into an underground cavity of an unknown size.
- Rainwater is acidic and erodes limestone. A clay-mud layer near the surface generally prevents/greatly restricts rainwater permeating to the bedrock. The water stays on the surface and floods the land. The area is all limestone.

- No scientifically reliable measurements have been undertaken of the rate of increase of the sink hole. These will commence on a regular basis this year.
- The proposal to build 50 houses would generate an increase in surface water to be disposed of via the drain. This will increase the underground erosion problem. As long as rainwater is allowed to enter the underground cavity, that cavity will increase in size and the risk will continue to grow.
- With the risk clear and environmental damage already occurring, this proposal should be struck from the Deposit Plan. Geological surveys should be undertaken to quantify the problems and risks.

Council Response

On review of the information provided and details held on file, the above-ground structure adjacent to Heol Fain is confirmed as a private foul pumping station on the attached DCWW asset plan. Engineering layouts approved under 2014/01424/2/CD indicate a separate surface water system, including a soakaway, located in the same general area.

The soakaway appears to have been located based on site-specific infiltration testing undertaken at the time, in accordance with standard practice, and reflects the inherent variability of the underlying geology.

While a sinkhole has been reported in the adjacent field and fractured ground conditions are known to exist locally, there is no evidence currently available to demonstrate a direct link between the approved drainage system and the formation of the sinkhole. In particular, there is no confirmation of a hydraulic connection, no monitoring data, and no hydrogeological assessment linking the soakaway to the observed feature. It is also relevant that the drainage system was constructed around 2015, whereas the sinkhole reportedly appeared in 2023. While subsidence features in limestone can develop over extended periods due to progressive ground processes, this timeframe does not in itself demonstrate a direct relationship between the drainage system and the observed feature. While it is recognised that infiltration drainage interacts with the ground, the extent to which this may influence such processes has not been demonstrated in this case.

Given the localised nature of the issue, further investigation such as a targeted geophysical survey could be appropriate to better understand subsurface conditions and identify any potential voids or anomalies if required.

Any future development would be required to comply with the Statutory Standards for Sustainable Drainage and be supported by detailed, site-specific ground investigation and drainage design. Given the variability in ground conditions identified, infiltration drainage would need to be carefully justified. Ground stability would also need to be addressed through appropriate assessment and design at planning stage.

In summary, while the concerns raised highlight the need to carefully consider ground conditions and drainage design, there is insufficient evidence to conclude that the existing drainage infrastructure is responsible for the reported sinkhole or that the site is unsuitable for allocation in principle.

Appendix 2 of the RLDP Deposit Plan lists all of the evidence that will likely be required at planning application stage for all sites, which includes a geoenvironmental and geotechnical desk study. The findings of this desk study would then trigger further detailed investigations and assessments of the geological conditions affecting the site, if appropriate.

Issue - Other matters raised

- Decrease in house value.
- Loss of sea view from home.

Concerns regarding a potential reduction in house prices are also noted; however, the effect of a development on property values is not a material consideration in planning decision-making. This position is well established through planning guidance and appeal decisions, which confirm that land and property values fall outside the scope of planning control.

It is well established in planning law that there is no statutory right to a private view. While it is acknowledged that the proposed development may alter the outlook from some neighbouring properties, this is not a material planning consideration in itself. The planning system seeks to protect living conditions in terms of matters such as privacy, daylight, sunlight, and overbearing impact, rather than the preservation of private views.

Council Overall Response

Following detailed review of the representations submitted in relation to Site HG 4.3 Land at Heol Fain, Wick the Council acknowledges the breadth of concerns raised.

Infrastructure delivery and appropriate mitigation will be essential to ensure that the development comes forward in a coordinated and responsible manner, and these matters have been considered in the allocation of the site. Further mitigation details will be required at the planning application stage and controlled by appropriate planning conditions.

Therefore, the Council considers that the allocation of Site HG4.3 remains sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

HG4.4 LAND NORTH OF WEST WINDS BUSINESS PARK, FFERM GOCH

Representation ID	Respondent Name	Representation Type
4420	Mrs Louise Reed [2764]	Object
4423	Helen Robbins [2765]	Object
4427	Mr Michael Robbins [2766]	Object
4870	Mr Edward Hunt [2995]	Object
4937	Mrs Karen Jacobs [2746]	Support
5512	Mrs Francesca Dixon [3275]	Object
5517	Mrs Francesca Dixon [3275]	Object
5527	Mrs Francesca Dixon [3275]	Object
5568	Mr Ian Richards [3301]	Object
5589	Mr David Hammond [1410]	Object
5713	Mr Ian Tarr [3340]	Object
5956	Llangan Community Council (Clerk) [239]	Object
6222	Mrs Helen Hammond [3490]	Object
6223	Mrs Elana Farrant [2789]	Object
6251	Mrs Juliana Wines [3503]	Object
6339	Mr Richard Brian Antuch [3065]	Object
6345	Mr Richard Brian Antuch [3065]	Object
6992	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment
7052	Marion morgan [2413]	Object
7088	Mr Phil John [1119]	Support
7154	Peter Stone Properties Ltd [1182]	Object
7175	Wig Fach Property Company Ltd [2373]	Object
7182	H Jones, L Sungur and P John [3741]	Support
7183	H Jones, L Sungur and P John [3741]	Comment
7184	H Jones, L Sungur and P John [3741]	Object

A total of 26 Representations were submitted in respect of the HG4.4 by 20 individual representors, raising a number of issues associated with the development of the site. It should be noted that some representors submitted more than one representation in respect of the site. Duplicate representations have only been counted once, but if representations made different points, these have been counted separately.

The key issues raised were road safety, the sustainability of the location, the loss of green space, SLA and biodiversity, school capacity, flood risk and housing need. It has also been suggested that the site be extended to incorporate adjoining land.

Individual statutory consultee responses have been addressed first.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

STATUTORY CONSULTEE RESPONSES

6992 - Dwr Cymru Welsh Water

- Water Supply - The water network can supply the proposed development.
- Wastewater - The public sewerage network can accept potential foul flows from this development site. A 150mm diameter foul sewer crosses the site.
- Wastewater Treatment Works - Cowbridge WwTW has capacity to accept foul flows from the proposed development.

Council response

The comments are noted. Appendix 2 and the Infrastructure Plan should be amended to reflect this.

Proposed changes

Make reference to the 150mm diameter foul sewer crossing the site in Appendix 2 and BP44 Infrastructure Plan.

Also reference that the water network can supply the proposed development, and the public sewerage network can accept potential foul flows and that Cowbridge WwTW has capacity to accept the foul flows.

INDIVIDUAL RESPONSE

7182 - H Jones, L Sungur and P John (Herbert R Thomas) - Support

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).

Council response

Support is noted.

7183 - H Jones, L Sungur and P John (Herbert R Thomas) – Comment

A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The site north of Westwinds business park, Fferm Goch has the ability to expand to the south to accommodate additional dwellings (both market and affordable dwellings) in order to sustain the viability of the site and meet need.

Council Response

The Council notes that there is additional land within the site promoter's ownership that could be included to extend the site. This larger site was submitted through the candidate site process (398) and ruled out as it did not accord with the plan strategy but was resubmitted with a smaller site area in the second call for sites for an affordable housing led development. The inclusion of the additional area would increase the capacity beyond would be considered to be a small-scale extension to the settlement. An extended boundary would also be illogical and would not reflect the existing pattern of development in the settlement.

7183 - H Jones, L Sungur and P John (Herbert R Thomas) – Object

There is concern surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

Council Response

It is considered that the scale of the site and number of dwellings proposed is appropriate for the size of Fferm Goch. The RLDP has made sufficient provision to meet total housing requirements and has sought to maximise affordable housing provision.

COMPOSITE RESPONSE

SUPPORT

Support for the proposal.

Council Response
Support is noted.

COMMENTS AND OBJECTIONS

Issue - Road Safety and Poor Road Structure

- Cars do not adhere to 20 mph limit
- Concern about increase in traffic
- Road unsuitable for emergency vehicles
- Access is via a single lane country lane

Council Response:

The Council acknowledges the concerns raised regarding road safety in the vicinity of the site. In support of the proposal, a Transport Statement has been prepared, accompanied by a traffic survey carried out in April 2024.

The survey identifies that the mean speed of traffic exceeds the prescribed 20mph speed limit. Notwithstanding this, the site provides adequate visibility splays in accordance with the Manual for Streets. It is also noted that no recorded accidents occurred on this road during the period 2018–2022.

The concerns about speeding traffic in the 20mph area are noted. However, this is related to driver behaviour rather than being directly related to any development on this site and is more appropriately addressed through separate measures such as enforcement or traffic interventions.

The Council's Highways Department has identified a number of improvements required as part of the development. These include upgrades to site access, a widening of the site boundary onto Southern Line to allow two vehicles to pass simultaneously, and an enlargement of the pedestrian footway along the site frontage. These requirements will be addressed and taken into account at the planning application stage. Subject to these measures being satisfactorily met, the Highways Department is satisfied that the local road network will operate safely and that the development will not result in any adverse impact on traffic levels.

The site is located on a single carriageway road with two lanes separated by a white line along its entire length between the A48 and Pencoed/M4. Whilst it is a rural road, it is not a narrow country lane.

The emergency services have been consulted and have no objected to the development.

Issue – Sustainability of location

- There is no public transport locally
- Development will lead to an increase in car use for shops, employment and healthcare
- Unsustainable location
- No immediate location employment opportunities

Council Response

The Council acknowledges the concerns raised regarding the limited public transport provision in the vicinity of the site.

It is accepted that transport opportunities in Fferm Goch are more limited when compared to larger settlements within the Vale of Glamorgan. Notwithstanding this, the site is within walking distance of a number of key local amenities, including Llangan Primary School, Llangan and St Mary Hill Village Hall, and Westwinds Business Park.

Whilst public transport options are limited, they are not entirely absent. Currently a bus service operates on the A48 at Pentre Meyrick, approximately 2km away, providing connections between Cardiff and Bridgend with approximately one bus per hour in each direction.

In addition, the Council is tendering for 3 additional rural Vale bus services. This is likely to include a service between Llantwit Major and Bridgend which will serve Fferm Goch, providing at least 4 services per day in each direction.

The Council also operates the Greenlinks Community Transport scheme, which provides demand-responsive transport across the rural Vale of Glamorgan. Greenlinks offers a practical and affordable solution for residents who may have difficulty accessing essential services and amenities. The scheme operates a fleet of accessible minibuses and cars which can be booked.

The Active Travel Network Map identifies a future walking and cycling route between Pentre Meyrick and Llangan (referenced Future 050A), linking to a future walking and cycling route along the A48 (Future 004H). Welsh Government Active Travel funding was received in September 2021 to look at active travel improvements from the A48 to Llangan, via Fferm Goch, to connect with the school and bus routes. A route option consultation was held in March 2022, which sought the views of residents on potential route options. Due to funding, the scheme has not progressed beyond concept design stage, but it may be progressed if funding becomes available in the future.

Additionally, a contribution toward improving Sustainable Transport will be a requirement of a future planning permission being granted, as set out in Appendix 2 of the Plan.

It is not accurate to say that there are no employment opportunities in the immediate area, as the site is directly adjacent to an established Business Park, which has good occupancy by a variety of small scale businesses.

It is acknowledged that Fferm Goch is not as sustainable as larger settlements in the Vale. It does not have as extensive a range of services, and sustainable linkages are acknowledged to not be as strong as within the larger settlements. Consequently it would not be appropriate to direct significant and strategic allocations to this location. However, the size and nature of the proposed allocation is reflective of critical affordable housing need in the Vale, and identified Housing need locally. The issues and specifics relating to the level of affordable housing need are discussed in the section below. However, it is considered that the size of proposed allocation represents an appropriate balance between housing need, and the sustainability of the location which, as noted above, is served by a number of important services and employment opportunities.

Issue – Loss of Green Space, SLA and biodiversity

- Removal of Green space

- Loss of habitats
- The site is within an SLA
- Interruption of views of countryside
- Loss of agricultural land

The Council acknowledges the concerns raised regarding the potential for ecological harm within the area.

As part of the evidence base for the proposed development, a Preliminary Ecological Appraisal was undertaken in 2023. The report sets out a series of recommendations for any future development, including the retention of existing hedgerows, the implementation of appropriate mitigation measures, and the protection of habitats such as bird nesting sites during their removal. The report also identifies the need for further ecological survey work to be completed prior to the submission of a planning application.

While the concerns regarding the site's location within the SLA are noted, the Council would advise that the SLA are not intended to prevent development. Rather, and as set out within paragraph 6.414 of the Deposit Plan, they are intended "*to ensure that where development is acceptable careful consideration is given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected*." Paragraph 6.415 of the plan then sets out that any such development within SLAs will be required to fully consider the impact of the proposal on the SLA through the submission of a Landscape and Visual Impact Assessment (LVIA).

Therefore, while accepting the proposed site's location within and Upper & Lower Thaw Valley SLA, the Council considers that any adverse impacts arising from the proposed development on the SLA would be adequately addressed through this mechanism and that such matters would be fully considered through the planning application stage where such matters as the scale, layout and visual integration of development can be controlled through sensitive siting, structural landscaping and screening, ensuring that the proposal responds appropriately to its rural context.

Regarding the loss of green space, the site comprises previously private land and as such does not result in the loss of any publicly recognised open space. However, the development will itself be required to either provide children's play space and general open space as part of its design, or make a contribution towards provision and enhancement in the local area.

The site is identified on the Predictive Agricultural Land Classification (ALC) Map to be Grade 3b land, which is not Best and Most Versatile (BMV) Agricultural Land.

With regards to the loss of the view of fields, it is well established in planning law that there is no statutory right to a private view. While it is acknowledged that the proposed development may alter the outlook from some neighbouring properties, this is not a material planning consideration in itself. The planning system seeks to protect living

conditions in terms of matters such as privacy, daylight, sunlight, and overbearing impact, rather than the preservation of private views.

Issue - Impact on Primary School

- Primary school is at full capacity

The Council acknowledges the concerns raised regarding the capacity of the local primary school.

Background Paper BP43 (Education) indicates that the proposed development would generate a requirement for three additional primary school places. The Council's Education Department has confirmed that Llangan Primary School is forecast to have sufficient capacity to accommodate the forecast pupils from this site.

Issues - Flood Risk

- Increase in surface water flooding

Council Response

The Council acknowledges the concerns raised regarding flooding and the potential for flood risk to be increased as a result of the development.

The Council has prepared a Stage 1 Strategic Flood Consequences Assessment (SFCA), utilising a range of data sources. The Flood Map for Planning, which is referenced in the SFCA, indicates that the site is not currently identified as being within a flood risk area for river, sea, surface water or small watercourses flooding.

It should be noted that all new and significant developments will have to implement some kind of sustainable drainage system (SuDS) as part of its design and build. These SuDS must be designed and built in accordance with standards published by Welsh Government and approved by the local authority acting in its role as a SuDS approval body (SAB). The SAB will then have the duty to adopt any compliant systems, serving multiple properties. Detailed consideration of any impact on surface water flooding is normally undertaken at planning application stage, when the site layout, finished ground levels and drainage design are known. For that reason, the RLDP requires any future planning application for this site to be supported by a Flood Consequences Assessment and a detailed drainage strategy.

Issue – Need and Type of housing

- No need for housing in rural area
- There have already been affordable housing developments in the area.
- Out of character with local area
- Proportion of affordable housing too high to create a genuine mixed community
- More affordable housing required

- The site is too small for 22 houses

The RLDP Strategic Policy SP1 sets out the spatial strategy for the plan and hierarchy of settlements where future development is considered. This sets out that the majority of future housing would be directed to the largest Key, Service and Primary settlements which are served by good public transport links and offer a range of services and facilities. Outside this strategic growth area, the majority of settlements are located within rural areas, which the Council recognise as having an important role both economically and socially for the residents of the area. The Plan seeks to support these areas by allowing for some small-scale developments in appropriate locations.

Fferm Goch is identified as a minor rural settlement within the rural Vale where small scale development is considered appropriate due to the settlement having a primary school, as well as employment opportunities at West Winds Business Park.

The Council's latest Local Housing Market Assessment 2023 (Background Paper 10B) identifies an affordable housing need within the ward of Llandow of 50 units, whilst the Council's housing waiting list (Feb 2026) indicated that there were 27 individuals registered for Llandow Ward. The provision of small-scale affordable housing led development as proposed through the allocation at Fferm Goch alongside market housing would aid in meeting these targets, especially as there would be a local lettings policy to ensure that the affordable units are available to residents with a local connection at both initial and subsequent occupations.

It is acknowledged that there have been affordable housing developments in the area in the last plan period – this has included Cwrt Canna in Fferm Goch and Clos Meurig in the nearby settlement of Pentre Meyrick, which were both rural exceptions sites, as well as Timbers Green in Fferm Goch, which included an element of Section 106 affordable housing. However, even after this affordable housing provision was delivered, there remains a significant need within the ward, and the provision of further affordable housing is justified.

Policy HG4 requires the market element of housing to be of a type and size that would contribute to local housing needs of community. In addition, the affordable element will be a mix of sizes and tenures (social rented and low cost home ownership), which collectively will ensure that there is an appropriate balance to achieve a mixed community.

A masterplan has been prepared which demonstrates that the site can accommodate the number of dwellings at an appropriate density. It is anticipated that the dwelling types and sizes will be in keeping with the types of development within the settlement.

Council Overall Response

Following detailed review of the representations submitted in relation to Site HG 4.4 Land at West Winds Business Park, Fferm Goch the Council acknowledges the breadth of concerns raised.

Infrastructure delivery and appropriate mitigation will be essential to ensure that the development comes forward in a coordinated and responsible manner, and these matters have been considered in the allocation of the site. Further mitigation details will be required at the planning application stage and controlled by appropriate planning conditions.

Therefore, the Council considers that the allocation of Site HG4.4 remains sound, deliverable, and aligned with the strategic objectives of the RLDP, representing an appropriate, sustainable and deliverable allocation within the RLDP.

ANNEX 6 - ACTIVE AND SOCIAL PLACES – TRANSPORT, RETAIL AND COMMUNITY INFRASTRUCTURE

This section addresses the representations made on the Transport, Retail and Community Infrastructure policies:

- SP10 Sustainable Transport
- TR1.1-TR1.3 Active Travel Routes
- TR1.4-TR1.5 Public Transport Schemes
- TR1.6-TR1.8 Highways Improvement
- SP11 Retail, Commercial and Service Centre Hierarchy
- SP12 Retail Floorspace Provision
- RSC1 Resilient Retail, Commercial and Services Centres
- RSC2 Edge of Centre and Out of Town Retailing
- RCS3 Hot Food Takeaways
- SP13 Community Infrastructure and Planning Obligations
- CI1 Open Space Provision
- CI2 Protection of Existing Open Spaces
- CI3 New Community Facilities
- CI4 Protecting and Enhancing Existing Community Facilities
- CI5 Cemetery and Crematorium Provision

SP10 - SUSTAINABLE TRANSPORT

A total of 13 representations were made on Policy SP10 from 11 representors (3 support, 5 objections, 5 comments). Whilst there was some support for policies promoting sustainable transport, one representor considered that prioritising sustainable transport over improving access for private cars could deter investment. Other issues raised included the need for bus and rail improvements to be delivered before development commences, the unreliability and infrequency of public transport services, and concerns regarding airport parking. It was also suggested that the policy wording requires greater clarity. Furthermore, it was noted that the terminology relating to active travel has evolved, and the Plan should now refer to 'wheeling' alongside walking and cycling.

STATUTORY CONSULTEE RESPONSES

6678 - South Wales Police – Secured by Design Officer – Comment

Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built. Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.

South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.

Council response

The comment is noted. South Wales Police are a consultee on relevant planning applications.

6725 - Cardiff and Vale University Health Board – Comment

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel Act guidance (Link: https://www.gov.wales/sites/default/files/publications/202201/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing flooding and making use more comfortable during hot weather (such as shading from trees).

Suggested Change

We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

Council response

Support is noted. We noted that the comment about updating the terminology to include ‘wheeling’ and agree that this should be included in Policy SP10 and in the other sections of the plan.

Proposed Change

The proposed amendments are as follows:

- SP10 – Criterion 1 - Siting new developments in sustainable and accessible locations where a range of services and facilities are within walking**, wheeling** and cycling distance.
- SP10 - Criterion 3 - Ensuring that new developments are designed to encourage walking, **wheeling,** cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use.
- Paragraph 6.181 (supporting text for SP10) - there is a need for improvements to public transport services and walking, **wheeling** and cycling infrastructure to encourage participation in Active Travel (walking, **wheeling** and cycling) especially for shorter journeys within and between the Vale’s towns and villages.
- Paragraph 6.185 (supporting text for SP10) - Accordingly, all new development should prioritise walking, **wheeling** and cycling from the earliest design stages.
- TR1 Transport Proposals - All highway improvements must also deliver demonstrable enhancements to walking**, wheeling** and cycling as part of any scheme.
- Paragraph 6.190 (supporting text for TR1) - Three Active Travel schemes aimed at improving walking**, wheeling** and cycling connectivity between settlements within the Strategic Growth Area have been identified.

- Paragraph 6.194 (supporting text for TR1) - This study considered 5 potential locations sited along the line to the south of St Athan with the central location (Section C) being considered the most appropriate location for the station given it's the proximity to St Athan (including RLDP housing allocations) and the potential for walking**, wheeling** and cycling connectivity… This area would be the Council's preferred location for a new station providing an opportunity for park and ride facilities and commercial development complimentary to a transport interchange and also includes enhanced walking, **wheeling** and cycling connections to St Athan.
- Paragraph 6.38 (supporting text for PGD1) - Providing safe and convenient routes for walking**, wheeling** and cycling will help tackle health problems associated with physical inactivity and social exclusion factors arising from car dependency, poor access to services and public transport facilities.

INDIVIDUAL RESPONSES

SUPPORT

5583 - Hall

We need hourly trains from Llantwit Major and trains from Llantwit and Rhoose straight into Cardiff. You can drive to Cardiff in the same time it takes to get the train from Llantwit Major and therefore there is no incentive to take public transport, particularly if you have to wait for 45 minutes for the next train.

Council response

Support for the sustainable transport policy is noted. There are currently hourly trains between Llantwit Major and Cardiff, but there are proposals to increase frequency to two trains an hour.

6784 - Persimmon Homes (Boyer Planning)

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives.

Council response

Support is noted.

6917 - Barratt Redrow Homes (Boyer Planning)

Baratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives.

Council response

Support is noted.

COMMENTS/OBJECTIONS

4604 - Barton – Object

This doesn't work in reality alienating outsiders from investing here.

Suggested change

Reverse this step and make the area easy to navigate by motor vehicle including free car parking en masse.

Council response

Policy SP10 encourages a modal shift towards sustainable forms of transport and increasing Active Travel opportunities. The request to make travel easier by motor vehicle would be contrary to the sustainable transport hierarchy set out within Planning Policy Wales and Llwybr Newydd, the Wales Transport selection, where travel by other private motor vehicles is at the lowest position in the hierarchy.

4983 - Reed – Object

Rhoose is taking some 10 percent of increased development yet there are no improvements to rail or bus services. The Plan allocates St Athan Rail land without any evidence it will be delivered. As a minimum there should be two trains an hour in Rhoose BEFORE any new development is even considered. Same with buses a minimum of 2 per hour. The active travel route to Weycock Cross also must be completed. If the developments at Rhoose cannot provide such enhancements the developments must not happen as the Plan would be unsound having not considered appropriate infrastructure.

Suggested change

Before any development in Rhoose better transport facilities as identified above must be provided. This is essential to make the Plan sound. Without them the Plan is unsound.

Council response

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements

around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

Rhoose is currently served by approximately hourly bus services to Llantwit Major in one direction, and Barry and Cardiff in the other direction. Whilst there are no plans at present to increase the frequency of the 304 bus service, the Council will continue to liaise with bus services providers in respect of opportunities to improve services.

The Weycock Cross to Cardiff Airport Active Travel Route is identified in the RLDP. The Council has secured scheme development funding for part of the route for the 2026/27 financial year, and construction funding has been identified in the Regional Transport Delivery Plan. Whilst this Active Travel link is important in improving connectivity between Barry and Rhoose, it is not considered that is necessary to limit development in Rhoose until this link is delivered.

5348 - Vincent – Comment

The bus to the airport has been at best a variable and very infrequent item. Most people who are looking not to pay for airport parking will regularly park their car, sometimes for several weeks, in Pontypridd Road and then get a taxi to and from the airport. My wife and I have seen this too many times to count. The airport bus has been too infrequent and too unreliable for most people.

Council response

A specific airport shuttle runs between Rhoose station and Cardiff Airport. This is an hourly service, timed to meet all trains. In addition, service 304 (Llantwit Major to Cardiff) also stops at Cardiff Airport.

The RLDP cannot control people parking on an unrestricted public highway. However, if people are parking in illegally, this should be reported to the relevant authorities.

5349 - Vincent – Comment

A regular public transport from Port Road area to either Dinas or Cardiff would indeed be welcome. But in the fifteen years we have lived here in Pontypridd Road there has been no such buses at all.

Council response

Service 304 runs approximately hourly from Port Road West to both Dinas Powys and Cardiff.

5363 - Vincent – Object

This bus service is unreliable and has dropped in an out of usage over the last decade. It is also infrequent and not easy to concide with flights. Many wishing to use the airport or

avoid airport parking charges will park their cars in Pontypridd Road - sometimes for two or more weeks and get a taxi to the airport.

Council response

A specific airport shuttle runs between Rhoose station and Cardiff Airport. This is an hourly service, timed to meet all trains. In addition, service 304 (Llantwit Major to Cardiff) also stops at Cardiff Airport.

The RLDP cannot control people parking on an unrestricted public highway. However, if people are parking in illegally, this should be reported to the relevant authorities.

5529 - May – Comment

Ensure active travel provision is in place before people move into new housing. All sites have potential to improve active travel for existing residents as well as new residents, reducing car dependency. Ensure active travel routes go beyond the sites to places people want to travel to and link with other active travel routes. Ebikes in particular have a real potential to reduce car use so ensure safe cycle storage for all households is included in plans. Improve access to public transport e.g. lifts at stations and better bus links to services.

Council response

Many active travel schemes are delivered using Section 106 funding. Section 106 payments are often phased in line with the delivery of a certain number of units, as it wouldn't be financially viable or often practical to deliver all active travel measures at the outset of a development. However, the planning department will seek to ensure that necessary improvements are delivered as early in the development programme as possible.

The comment about the potential for e-bikes to reduce car use is acknowledged and the need for safe cycle storage is noted.

5656 - Entwistle - Object

The plan does not go into enough depth in how to council plans to realistically deliver and encourage active travel options. At present public transport services fall far short of the route network and frequency required to make them a realistic alternative for most journeys. Concrete, realistic and deliverable improvements need to be included in the LDP rather than simple vague promises.

Suggested change

The council needs to commit to expanding the bus network and providing subsidies if required. Better bus linkups to train stations need to be provided along with additional parking at current stations. The timetables need to be overhauled and increased frequencies of services as at present even residents wanting to take public transport to a place of work in Cardiff for example cannot due to a range of factors. The LDP needs to actually lay out how these improvements can be achieved.

Council response

The Council acknowledges the importance of public transport in supporting sustainable communities and reducing reliance on the private car. The Deposit Plan seeks to direct growth to locations that are accessible by a range of transport modes and includes policies which support improvements to public transport infrastructure and services.

It should be noted that the Council does not have direct control over bus service provision, service frequencies, timetables or fare structures, which are the responsibility of bus operators. Similarly, decisions relating to rail services and station improvements are outside the control of the Council. Notwithstanding this, the Council will continue to work with public transport providers to ensure that improvements are aligned with new developments.

5911 - HBF – Object

Point 6 of the policy should be reworded, as it is not for a developer to provide transport services, at best and only where required as a direct result of the proposed development; they can contribute towards transport services provided by others.

The wording 'As appropriate, new development proposals will be required to provide Transport Statements, Transport Assessments and Travel Plans to ensure the delivery of travel choice and sustainable opportunities for travel.' Is considered to be too vague. There is no clarification on when it would be 'appropriate' and in what scenario would one or all of the reports mentioned be required.

Further, the supporting text para. 6.187 does not really provide any specific guidance to support this policy requirement. At what stage in the planning process would it be decided that one or all of these documents are required, and based on what criteria? This lack of clarity could lead to delays in the delivery of new homes and uncertainty for developers.

Suggested change

Point 6 should be reworded as follows:

'Contribute to new or enhanced transport services and facilities where appropriate.'

Clear criteria should be set for when the various highway reports are required to be submitted with an application.

Council response

Policy SP10 does not state that developers must provide new or enhanced transport services. Instead, it is worded that the provision of transport services is a way of meeting the RLDP vision and objectives. The first paragraph of the policy is clear that new developments must support an enhanced transport network, rather than provide it.

The thresholds for the provision of Transport Assessments is set out by land use in Technical Advice Note (TAN) 18: Transport. The supporting text for Policy SP10 is clear that developers

should refer to the latest Welsh Government guidance. As these thresholds may be subject to change, referencing the latest Welsh Government guidance rather than repeating a national policy that may become outdated is considered to be an appropriate approach.

TR1 – TRANSPORT PROPOSALS

TR1.1 ACTIVE TRAVEL ROUTES – BARRY TO DINAS POWYS

Three representations were received on the Active Travel Proposal between Barry (Biglis Roundabout) and Dinas Powys. Two representations were in support of the proposal, and one objection, raising concerns that the proposal would not be used by cyclists and the road should be widened or a bypass built instead.

INDIVIDUAL RESPONSES

SUPPORT

5661 - Entwistle - Support

A pedestrian and cycling route will be a big improvement and allow both safer travel and recreational walking/cycling. As a user of these route in my area my main request is that they are more regularly cleaned by road sweeper and little pickers. When walking it's disappointing to see how much rubbish accumulates along routes and often after heavy rain and storms the amount of dropped branches and leaves can make cycling hazardous

Council Response

Support is noted.

6785 - Persimmon Homes - Support

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements.

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

Council Response

Support is noted.

COMMENTS/OBJECTIONS

4465 - Scutt - Objection

This is a busy road at all times, to add addition houses along it route, in Dinas especially will cause significant delays.

The road has a proposed cycle path which is not completed yet, I also feel that the cycle path will not be used by cyclists.

Walking on this road is very dangerous at the best of times. All against the proposed strategy of alternative transport and against SSC1 section 9 'traffic'

Suggested Change

Dinas Powys needs to have major improvement to the Barry/Cardiff road to allow, cycling, walking (especially to Barry).

The main road could be widened, and given it is now sinking, to the SW of DP, major restructure is needed sone, do this with a widening scheme first, then map the traffic flow (which was I previous reports at capacity) to see if housing can happen then, but only after the flow is improved or bypassed.

Dinas Powys needs to have reinstated the proposed By Pass to enable fluid links between Cardiff and Barry, avoiding the Dinas Powys Bottleneck.

Council Response

A planning application for an Active Travel route between Biglis roundabout in Barry and Dinas Powys was approved in September 2026. The approved route includes a shared footway and cycleway, comprising a 4m wide active travel route passing within the fields adjacent to Cardiff Road and a section alongside the adopted highway separated from the highway be a verge. It is considered that this active travel route would represent a much safer alternative that the existing situation. Funding has been secured this financial year for the commencement of works on the section of the route on the adopted highway through Parc Bryn y Don, Heol y Frenhines and St Cadoc's Avenue, with the section alongside Cardiff Road planned for next financial year.

Initial options are currently being considered for provision of an active travel route for the northern part of Dinas Powys.

The Unitary Development Plan (UDP) 1996-2011, adopted in 2005, protected land for a new Barry Waterfront to Cardiff Link Road, which aimed provide better connections between Barry Docks with Cardiff Bay. The proposal included a new section of road through an area of open countryside between Penarth and Dinas Powys, effectively serving as a Dinas Powys bypass.

The scheme was not progressed during the UDP plan period, and, following reconsideration through the LDP process, it was not carried through into the adopted LDP. Representations were made on the omission of the proposal as part of the LDP process. However, following Examination, the Inspector concluded "*I have not been provided with any information that would indicate that such a proposal is likely to receive the necessary political support and funding to enable it to be delivered within the Plan period. Indeed, the Council remains of*

the view that, whilst the provision of a by-pass would partially address through traffic issues, it would not address the primary issues which cause the congestion, including the constraints imposed by the Merrie Harrier and Barons Court junctions…PPW is clear that infrastructure proposals should only be included within LDPs if they are realistic and likely to be implemented during the plan period to assist in keeping blight to a minimum. Indeed, in light of the lack of certainty regarding any such scheme, I am satisfied that it should not be defined within the Plan."

Planning Policy Wales, and Llwybr Newydd, the Wales Transport Strategy, set a clear hierarchy that prioritises walking, cycling and public transport above car use. The development of a significant stretch of new road infrastructure would encourage car travel and would not support a modal shift towards sustainable travel, contrary to the aims of national policy. It therefore remains the case that a Dinas Powys bypass would not be supported.

TR1.2 ACTIVE TRAVEL ROUTES – SULLY TO COSMESTON

Three representations of support for the proposal were received for the proposed active travel route between Sully and Cosmeston.

INDIVIDUAL RESPONSES

SUPPORT

5532 – May – Support
5662 – Entwistle– Support
6850 – Taylor Wimpey - Support

Council Response

Support is noted. The proposed active travel route has now been granted planning permission.

TR1.3 ACTIVE TRAVEL ROUTES – WEYCOCK CROSS TO CARDIFF AIRPORT

Eight Representation were made in respect of TR1.3. Three representations of support for the proposed active travel route between Weycock Cross and Cardiff Airport were received, in addition to 4 comments and 1 objection. Concerns were raised about increasing walking and cycling on this route on safety grounds, likely usage, cost, land ownership constraints and the impact this may have on traffic flows.

INDIVIDUAL RESPONSES

SUPPORT

4499 – Parker – Support
5534 – May – Support

Council response

Support is noted.

5663 – Entwistle – Support

Council response

Support is noted. The comment regarding the accumulation of rubbish and also fallen branches/leaves after storms is noted. Residents are advised to report any obstructions or hazards on any active travel route to the Council.

COMMENTS/OBJECTIONS

4402 - Gill – Objection

The area is already very congested and at times is akin to a car park. This would be a dangerous area to encourage cycling or walking unless drastic action to improve the road is taken. Small changes will not improve the safety or traffic flow. As the airport is increasing its flights and a college is being built the council has already ensured the road is over its natural capacity makes the whole area around Pontypridd road a misery for local residents. Rhoose and St Athens increases will create total gridlock & extreme frustration especially for school runs.

Suggested Change

I don't agree with the plan to expand cycle and pedestrian routes around Port Road as it can be a dangerous road to travel along. The public transport is totally inadequate and this site is too far away from train stations. I also don't see any mention of elderly or disabled residents!

Council Response

The proposed active travel route along Port Road would need to adhere to Welsh Government active travel guidance, ensuring sufficient width and appropriate separation from the road to maintain user safety. Currently, there is no footpath along the majority of the route between Weycock Cross Roundabout and Cardiff Airport, resulting in pedestrians walking along a grass verge and cyclists using a 40 mph road. The provision of an active travel route will significantly improve safety for both walking and cycling along this corridor. The route will be designed to be accessible to all users, including older residents and those with disabilities.

5632 - Dubois-Jones - Comment

Current active travel routes are not suitable and hardly used by cyclists who use the roads instead for some reasons probably as the surface is dipped in areas and car users park on them as in Rhoose. Also sections are created in areas but the track is not continuous and then deter users as the main road is too dangerous for cycliste and families with children. Active routes should be created as in the Netherlands, they would be much better and safer!

Council Response

The Council cannot mandate cyclists to use active travel routes. However, as much of this route will be segregated, it is likely to be more attractive to confident cyclists than a shared-use path, where there is greater potential for conflict between users.

5982 - Reed - Comment

The active travel route is very expensive and has land ownership problems between rhoose and barry. Can it really be implemented in the plan period?

Council Response

A report was considered by Cabinet in July 2026 where it was approved that delegated authority be given to proceed with land negotiations, tender preparation, funding applications, procurement of required professional services and contractors and the evaluation and award of contracts necessary to deliver the project. Cabinet also endorsed the submission of external funding bids to the Regional Transport Authority to secure delivery funding for the scheme.

The route has been designed in three phases:

- Phase A – section of shared use near Holiday Inn (connecting to existing shared use on to Rhoose)
- Phase B – section from Barry to Model Farm
- Phase C – section from Model Farm to Holiday Inn

Phase A was constructed in FY24/25. Detailed design has been completed for Phase B with Phase C detailed design programmed for completion in FY 2026/27. Additional surveys are

ongoing to support scheme development. Land acquisition will be required prior to the commencement of construction. A total of six parcels of land are to be acquired from six landowners to complete the scheme as per the agreed final design. The land acquisition cost estimates have been produced based on 2023 land values by property experts Bruton Knowles. The total of land acquisition costs are estimated to be £70,500. The land acquisition costs are to be funded from the regional transport funding awarded for FY2026/27.

The total estimated cost of the scheme is £4,000,000. Funding to date has been secured through Welsh Government Active Travel grant and Section 106 sustainable transport funding, with further bids planned for Regional Transport funding to support construction phases. The scheme has been identified within the Regional Transport Development Plan as a priority for funding over the next five-year period.

The scheme is considered to be permitted development as the works are being undertaken on behalf of the Council in connection with its statutory highway functions.

5994 - Campbell – Comment

Further clarification is needed as to whether this land will be acquired through CPO and at what cost.

Council Response

A report was considered by Cabinet in July 2026 where it was approved that delegated authority be given to proceed with land negotiations, tender preparation, funding applications, procurement of required professional services and contractors and the evaluation and award of contracts necessary to deliver the project. The Council is hoping to progress this without the use of CPO powers but CPO is an option should this be required. Cabinet also endorsed the submission of external funding bids to the Regional Transport Authority to secure delivery funding for the scheme.

The route has been designed in three phases:

- Phase A – section of shared use near Holiday Inn (connecting to existing shared use on to Rhoose)
- Phase B – section from Barry to Model Farm
- Phase C – section from Model Farm to Holiday Inn

Phase A was constructed in FY24/25. Detailed design has been completed for Phase B with Phase C detailed design programmed for completion in FY 2026/27. Additional surveys are ongoing to support scheme development. Land acquisition will be required prior to the commencement of construction. A total of six parcels of land are to be acquired from six landowners to complete the scheme as per the agreed final design. The land acquisition cost estimates have been produced based on 2023 land values by property experts Bruton

Knowles. The total of land acquisition costs are estimated to be £70,500. The land acquisition costs are to be funded from the regional transport funding awarded for FY2026/27.

The total estimated cost of the scheme is £4,000,000. Funding to date has been secured through Welsh Government Active Travel grant and Section 106 sustainable transport funding, with further bids planned for Regional Transport funding to support construction phases. The scheme has been identified within the Regional Transport Development Plan as a priority for funding over the next five-year period.

5374 - Vincent - Objection

It is impossible to see how the development at North West Barry 'will deliver part of the 1.7-mile route, along the frontage of the site' without contributing to the already overloaded flow of traffic on the routes in and out of Barry. The measures suggested cannot possibly 'mitigate' the density of increased traffic this development will incur. That the options offered will improve the situation seems wishful thinking. The data collection appears thin and unsubstantiated. It appears the planners have cherry-picked data to at arrive at a conclusion already held in advance. We are not persuaded.

Council Response

Indicative plans showing the potential mitigation options at Weycock Cross roundabout are included in Appendix A and B of Technical Note 7 of BP14A Strategic Transport Assessment Stage 2. In both options, it is demonstrated that a new active travel route fronting Port Road West can be delivered within the land ownership boundary of Key Site allocation KS1 whilst also providing land to facilitate the widening of the western arm of the roundabout. The results of the capacity modelling are included within Appendix C of Technical Note 7.

TR1.4 PUBLIC TRANSPORT SCHEMES – ST ATHAN TRANSPORT INTERCHANGE

A total of 12 representations were received on the proposal for a transport interchange at St Athan (2 representation of support, 5 comments and 5 objections). The key issues raised were the timescales for delivery, and how this relates to the mixed-use element of the adjoining allocation. Respondents considered that this should be delivered in advance of developments in the area and raised concerns on how realistic the delivery of the proposal is.

INDIVIDUAL RESPONSES

SUPPORT

5101 - Brown – Support

6742 - Hallam Land Management - Support

Support is noted.

COMMENTS/OBJECTIONS

6744 - Hallam Land Management – Comment

Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.

Council Response

The Council recognises that the illustrative masterplan for the eastern parcel of the housing allocation KS5 comprises a mix of uses, including transport interchange elements, as well as commercial uses that would complement the interchange but could also be brought forward as a standalone development. Early engagement with all relevant stakeholders on any detailed designs is encouraged to ensure that no individual proposals would adversely impact the delivery of the wider scheme.

5855 - Smith – Comment

Needs to be completed before the other developments in the area.

Council Response

The Council will continue to work with key stakeholders to seek to facilitate the delivery of the station at the earliest opportunity.

5665 - Entwistle – Comment

The interchange is a good start to improve public transport use but the frequency and expansion of bus and train services throughout the whole of the vale also needs to be addressed in order to encourage use and make it a practical alternative to private vehicle use. Simply building new interchanges and bus stops on its own is not enough.

Council Response

The support for the principle of St Athan transport interchange is welcomed, and the comment that this must be accompanied by the increase in frequency of buses and trains is acknowledged.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

The introduction of additional rail services at Llantwit Major and Rhoose will improve integration with the bus service.

The Council also continues to liaise with bus services providers and consideration will be given to how the bus service timetabling can integrate with any new interchange, once the scheme is sufficiently progressed. The Council is tendering for 3 additional rural Vale bus services which are likely to begin in December 2026.

5995 - Campbell – Comment

TfW have already stated they will not be adding a train station in St Athan so what exactly is this in relation to? And how does it open the already poor public transport in the rural Vale to more links?

Council Response

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

The introduction of additional rail services at Llantwit Major and Rhoose will improve integration with the bus service.

The Council also continues to liaise with bus services providers and consideration will be given to how the bus service timetabling can integrate with any new interchange, once the scheme is sufficiently progressed. The Council is tendering for 3 additional rural Vale bus services which are likely to begin in December 2026.

4663 - Griffiths – Objection

With the refusal to facilitate a Railway station at St Athan puts increasing volumes of traffic on an already busy A4226

Suggested Change

Rethink the Railway Station at St Athan

Council Response

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

6444 - Jenkins – Comment

Lack of Commitment to a Railway Station at St Athan. Despite decades of discussion, there is still no commitment from either Welsh Government or Transport for Wales— financial, strategic, or operational—to delivering a railway station at St Athan. No feasibility study, timetable, or land safeguarding exists. Yet the RLDP assumes that large-scale housing growth can be justified in the area. This assumption is not supported by evidence and locks the community into long-term car dependency. Even if a railway station at St Athan is developed in future years, it is highly likely the then ingrained dependence on car use will be extremely difficult to reverse.

Council Response

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

A Preliminary Feasibility Study was undertaken in 2022 to assess the potential for a new railway station on the Vale of Glamorgan Line at St Athan. This study examined a range of potential locations and considered the opportunities and constraints associated with each site. The report concluded that, of the five locations assessed, four (Sections A to D) present opportunities for a new station. Sections C and D offer the greatest potential for sustainable integration with St Athan, given their proximity to the village and to both existing and proposed residential development.

The report also sets out a number of recommended next steps, including further detailed assessment of opportunities and constraints such as track gradient, passenger demand forecasting, initial timetable analysis, and liaison with Network Rail.

The land safeguarded in the RLDP corresponds to the area identified in the study as Section C, which is most closely related to existing and proposed development in St Athan. The preferred station location, to the south of the settlement, would be within 800m of both key sites proposed in St Athan and would also be easily accessible to the existing village population. There is also potential to enhance pedestrian and cycle access along the B4265 as part of the key site developments.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

As recommended in the 2022 feasibility report, initial passenger demand forecasting work has been undertaken by TfW. This indicates that the scale of residential and employment development proposed in St Athan would support the business case for a new station. The initial forecasting also indicated that, in a scenario where the RLDP housing and employment sites are not included, the required threshold of forecast passenger trips necessary to justify a station would be more difficult to achieve.

TfW has confirmed that a study will be required to establish whether a new station could be accommodated within the timetable for services on the Vale of Glamorgan Line. However, TfW has indicated that, as a result of future timetable changes, which will facilitate a longer turnaround time at Bridgend station, the timetable is likely to be able to accommodate an additional station.

Whilst St Athan station has not been identified within the current central government spending review, which sets out priority spending for a four-year period from 2025, part of the spending review budget has been safeguarded for future spending reviews. This may present further opportunities for funding. In addition, there are other potential funding sources, including the new stations fund, which could be utilised.

St Athan station is listed in 'Today, Tomorrow, Together' as a potential new station serving the local community and the Bro Tathan Business Park. The vision document also recognises that it would support wider plans for housing and businesses in the area, including the redevelopment of the former Aberthaw power station site.

It is accepted that the delivery of a new station is a longer-term proposal, and it may be the case that new housing is delivered in advance of the station. However, the Council considers that the delivery of a station remains a realistic prospect within the plan period up to 2036 and as noted above, delivery of a station is likely to be dependent on a sufficient critical mass of population and employment, to generate the necessary trips.

Neither the employment nor housing allocations are considered to be reliant and dependent on the delivery of the station. St Athan is identified as a primary settlement within the Strategic Growth Area, reflecting the range of services and facilities available. Furthermore, the co-location of housing with the employment sites at Bro Tathan and Aberthaw means that the settlement is sustainable in its own right. This aligns with the key objective of the plan to locate new housing, employment, services and facilities in close proximity, thereby reducing the need to travel.

Notwithstanding this, delivery of the station would enhance opportunities for sustainable travel, and its delivery at the earliest opportunity would be supported.

St Athan is just over 3 miles from Llantwit Major station with bus link between the settlements, as well as park and ride facilities at Llantwit Major. There may be the potential for the delivery of a transport interchange/park and ride at the preferred St Athan station site providing direct connections to Llantwit Major station in advance of the delivery of a rail station. Rhoose station is also approximately 4.5 miles away, with the settlement also being served by a bus service.

6583 - Haines - Objection

The RLDP safeguards land for a "transport interchange" at St. Athan. However:

- There is no confirmed rail station.

- There is no confirmed funding package.

- There is no defined delivery programme.

- There are no binding occupation triggers linking housing delivery to transport delivery.

Previous references in planning documents referred to a railway station. The revised terminology of "transport interchange" reflects uncertainty. Under Future Wales - The National Plan 2040, growth within the South East National Growth Area should align with sustainable transport infrastructure. Without guaranteed rail provision, development risks being car-dependent and inconsistent with decarbonisation objectives. This raises concerns under the soundness test: Will the plan deliver?

Council Response

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

A Preliminary Feasibility Study was undertaken in 2022 to assess the potential for a new railway station on the Vale of Glamorgan Line at St Athan. This study examined a range of potential locations and considered the opportunities and constraints associated with each site. The report concluded that, of the five locations assessed, four (Sections A to D) present opportunities for a new station. Sections C and D offer the greatest potential for sustainable integration with St Athan, given their proximity to the village and to both existing and proposed residential development.

The report also sets out a number of recommended next steps, including further detailed assessment of opportunities and constraints such as track gradient, passenger demand forecasting, initial timetable analysis, and liaison with Network Rail.

The land safeguarded in the RLDP corresponds to the area identified in the study as Section C, which is most closely related to existing and proposed development in St Athan. The preferred station location, to the south of the settlement, would be within 800m of both key sites proposed in St Athan and would also be easily accessible to the existing village population. There is also potential to enhance pedestrian and cycle access along the B4265 as part of the key site developments.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

As recommended in the 2022 feasibility report, initial passenger demand forecasting work has been undertaken by TfW. This indicates that the scale of residential and employment development proposed in St Athan would support the business case for a new station. The initial forecasting also indicated that, in a scenario where the RLDP housing and employment sites are not included, the required threshold of forecast passenger trips necessary to justify a station would be more difficult to achieve.

TfW has confirmed that a study will be required to establish whether a new station could be accommodated within the timetable for services on the Vale of Glamorgan Line. However, TfW has indicated that, as a result of future timetable changes, which will facilitate a longer turnaround time at Bridgend station, the timetable is likely to be able to accommodate an additional station.

Whilst St Athan station has not been identified within the current central government spending review, which sets out priority spending for a four-year period from 2025, part of the spending review budget has been safeguarded for future spending reviews. This may present further opportunities for funding. In addition, there are other potential funding sources, including the new stations fund, which could be utilised.

St Athan station is listed in 'Today, Tomorrow, Together' as a potential new station serving the local community and the Bro Tathan Business Park. The vision document also recognises that it would support wider plans for housing and businesses in the area, including the redevelopment of the former Aberthaw power station site.

It is accepted that the delivery of a new station is a longer-term proposal, and it may be the case that new housing is delivered in advance of the station. However, the Council considers that the delivery of a station remains a realistic prospect within the plan period up to 2036 and as noted above, delivery of a station is likely to be dependent on a sufficient critical mass of population and employment, to generate the necessary trips.

Neither the employment nor housing allocations are considered to be reliant and dependent on the delivery of the station. St Athan is identified as a primary settlement within the Strategic Growth Area, reflecting the range of services and facilities available. Furthermore, the co-location of housing with the employment sites at Bro Tathan and Aberthaw means that the settlement is sustainable in its own right. This aligns with the key objective of the plan to locate new housing, employment, services and facilities in close proximity, thereby reducing the need to travel.

Notwithstanding this, delivery of the station would enhance opportunities for sustainable travel, and its delivery at the earliest opportunity would be supported.

St Athan is just over 3 miles from Llantwit Major station with bus link between the settlements, as well as park and ride facilities at Llantwit Major. There may be the potential for the delivery of a transport interchange/park and ride at the preferred St Athan station site providing direct connections to Llantwit Major station in advance of the delivery of a rail station. Rhoose station is also approximately 4.5 miles away, with the settlement also being served by a bus service.

7045 - Marion Morgan – Objection
7147 - Peter Stone Properties Ltd – Objection
7166 - Wig Fach Property Company Ltd – Objection

It is now the case 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.

Council Response

Land has been safeguarded in St Athan in the RLDP for a transport interchange, including a new station, as part of Key Site HG1 KS5 and under Policy TR1.4.

A Preliminary Feasibility Study was undertaken in 2022 to assess the potential for a new railway station on the Vale of Glamorgan Line at St Athan. This study examined a range of potential locations and considered the opportunities and constraints associated with each site. The report concluded that, of the five locations assessed, four (Sections A to D) present opportunities for a new station. Sections C and D offer the greatest potential for sustainable integration with St Athan, given their proximity to the village and to both existing and proposed residential development.

The report also sets out a number of recommended next steps, including further detailed assessment of opportunities and constraints such as track gradient, passenger demand forecasting, initial timetable analysis, and liaison with Network Rail.

The land safeguarded in the RLDP corresponds to the area identified in the study as Section C, which is most closely related to existing and proposed development in St Athan. The preferred station location, to the south of the settlement, would be within 800m of both key sites proposed in St Athan and would also be easily accessible to the existing village population. There is also potential to enhance pedestrian and cycle access along the B4265 as part of the key site developments.

The Welsh Government has allocated £100,000 directly to Transport for Wales (TFW) to support further feasibility work for a St Athan station in the 2026/27 financial year. This funding will build upon the 2022 feasibility study and will focus on engineering feasibility and options development, ahead of the preparation of an Outline Business Case. The Council will continue to work closely with TFW in progressing this further work.

As recommended in the 2022 feasibility report, initial passenger demand forecasting work has been undertaken by TfW. This indicates that the scale of residential and employment development proposed in St Athan would support the business case for a new station. The initial forecasting also indicated that, in a scenario where the RLDP housing and employment sites are not included, the required threshold of forecast passenger trips necessary to justify a station would be more difficult to achieve.

TfW has confirmed that a study will be required to establish whether a new station could be accommodated within the timetable for services on the Vale of Glamorgan Line. However, TfW has indicated that, as a result of future timetable changes, which will facilitate a longer turnaround time at Bridgend station, the timetable is likely to be able to accommodate an additional station.

Whilst St Athan station has not been identified within the current central government spending review, which sets out priority spending for a four-year period from 2025, part of the spending review budget has been safeguarded for future spending reviews. This may present further opportunities for funding. In addition, there are other potential funding sources, including the new stations fund, which could be utilised.

St Athan station is listed in 'Today, Tomorrow, Together' as a potential new station serving the local community and the Bro Tathan Business Park. The vision document also recognises that it would support wider plans for housing and businesses in the area, including the redevelopment of the former Aberthaw power station site.

It is accepted that the delivery of a new station is a longer-term proposal, and it may be the case that new housing is delivered in advance of the station. However, the Council considers that the delivery of a station remains a realistic prospect within the plan period up to 2036 and as noted above, delivery of a station is likely to be dependent on a sufficient critical mass of population and employment, to generate the necessary trips.

Neither the employment nor housing allocations are considered to be reliant and dependent on the delivery of the station. St Athan is identified as a primary settlement within the Strategic Growth Area, reflecting the range of services and facilities available. Furthermore, the co-location of housing with the employment sites at Bro Tathan and Aberthaw means that the settlement is sustainable in its own right. This aligns with the key objective of the plan to locate new housing, employment, services and facilities in close proximity, thereby reducing the need to travel.

Notwithstanding this, delivery of the station would enhance opportunities for sustainable travel, and its delivery at the earliest opportunity would be supported.

St Athan is just over 3 miles from Llantwit Major station with bus link between the settlements, as well as park and ride facilities at Llantwit Major. There may be the potential for the delivery of a transport interchange/park and ride at the preferred St Athan station site providing direct connections to Llantwit Major station in advance of the delivery of a rail station. Rhoose station is also approximately 4.5 miles away, with the settlement also being served by a bus service.

TR1.5 PUBLIC TRANSPORT SCHEMES – COGAN INTERCHANGE

Three representations were received on the proposal for a transport interchange at the existing Cogan station (1 support, 2 comments). The key concerns raised were that the frequency of bus and train services needs to increase and there is a need to improve bridge and platform accessibility as a priority.

SUPPORT

5537 - May – Support

Council response

Support is noted.

COMMENTS/OBJECTIONS

5666 – Entwistle – Comment

The interchange is a good start to improve public transport use but the frequency and expansion of bus and train services throughout the whole of the vale also needs to be addressed in order to encourage use and make it a practical alternative to private vehicle use. Simply building new interchanges and bus stops on its own is not enough.

Council Response

The support for the principle of Cogan transport interchange is welcomed, and the comment that this must be accompanied by the increase in frequency of buses and trains is acknowledged.

To improve public transport in the area, the Council continues to lobby for an increased frequency of train services on the Vale of Glamorgan Line. In March 2026, Transport for Wales (TFW) reaffirmed their aim of delivering timetable improvements to achieve two trains per hour for customers travelling between Bridgend and Cardiff on the Vale of Glamorgan Line. TFW have confirmed that significant progress has been made in delivering the infrastructure and fleet changes required. This has included the completion of the electrification of the upper Rhymney line, and work is progressing to secure the necessary permissions to introduce Class 756 tri-mode trains on the line. TFW have confirmed that they require the Class 756 trains to be running reliably before increasing to a full timetable of two trains an hour.

In support of introducing new Class 756 trains on the Vale of Glamorgan Line, TFW is working closely with Network Rail and the VoG to resolve rail operational requirements around existing level crossings. Any material change that impacts either the usage of a level crossing by the public or the frequency of train movements must satisfy a robust level crossing risk assessment process undertaken by Network Rail. TFW currently anticipates that

subject to resolving both the outstanding rolling stock and level crossing matters, the enhanced timetable will be introduced from 2027.

The introduction of additional rail services at Llantwit Major and Rhoose will improve integration with the bus service.

This will improve connections between Cogan and Rhoose, Llantwit Major and Bridgend. There are already frequent services (4 trains an hour) between Cogan and Barry and between Cogan and Cardiff.

The Council also continues to liaise with bus service providers and consideration will be given to how the bus service timetabling can integrate with any new interchange, once the scheme is sufficiently progressed.

6940 - Penarth Town Council – Comment

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

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this. Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Suggested Change

Members want more detail on Cogan Transport Interchange's future developments. Improving bridge and platform accessibility should be a priority, before landscaping. Bus providers must address the increased pressure on local transport services.

Council response

Transport for Wales undertook a public consultation in late 2025 on what improvements could be made to Cogan station and the surrounding area, and the feedback from this survey will inform future design proposals, which will be subject to further consultation once detailed designs have been prepared.

The Council also continues to liaise with bus services providers and consideration will be given to how the bus service timetabling can integrate with any new interchange, once the scheme is sufficiently progressed.

TR1.6 HIGHWAYS IMPROVEMENTS – WEYCOCK CROSS ROUNDABOUT

Representation ID	Respondent Name	Representation Type
4678	Mr Tim Griffiths [2578]	Object
4984	Emma Reed [2653]	Object
5364	Professor Andrew Vincent [920]	Comment
5669	Mr David Entwistle [3264]	Comment
5738	Professor Andrew Vincent [920]	Comment
5744	Mrs Mary Vincent [2657]	Comment
5800	Mrs Catherine Hart [879]	Comment
5804	Mrs Catherine Hart [879]	Comment
6142	Mrs Jacky Williams [3343]	Comment
6289	Mr Steve Ashman [3161]	Object
6851	Taylor Wimpey [386]	Object
7231	Gwynfor Parr [3649]	Object

A total of 12 representations from 10 respondents were received in respect of the proposed highway improvements at Weycock Cross roundabout. These included concerns about capacity and the supporting site specific and strategic transport assessments that have informed the proposed mitigation scheme.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. A full response on each issue has been provided.

COMPOSITE RESPONSE

COMMENT/OBJECTIONS

Issue - Capacity

- The roundabout is already over capacity at many times of day.
- There will be 700 plus cars trying to access Port Road immediately by the roundabout.
- Emergency services will struggle.
- The existing network is disproportionately affected in the event of disruption to traffic flows (accidents, temporary traffic lights, broken down vehicles).
- National planning policy states that development should not worsen traffic or pollution.

Council response

The Deposit RLDP is supported by a Strategic Transport Assessment (BP14 Stage 1 and BP14A Stage 2). The purpose of the STA is to assess the operation of the strategic highway network and to identify the potential individual and cumulative impacts arising from the proposed RLDP strategic housing allocations. As part of the Stage 1 STA, baseline traffic

conditions were reviewed for a number of strategic junctions and roundabouts, including Weycock Cross roundabout.

The Stage 2 STA then considered the future operation of the junction using the Transport for Wales South East Wales Transport Model to obtain origin/destination data throughout the Vale of Glamorgan, with this data then processed through bespoke detailed junction models. The assessment applies forecast background growth through 2036 in line with industry-standard procedures and separately tests the cumulative impact of the strategic housing allocations. This provides a robust and proportionate basis for identifying whether mitigation is required.

In addition to the STA, a site-specific Transport Assessment has been prepared by the site promoters to support housing allocation HG1 KS1 Land at North West Barry. The modelling for the site-specific Transport Assessment reflects a 2025 base date and utilises junction turning count data, Google Maps average journey time data and on-site observations. The Transport Assessment indicates that each of the arms of Weycock Cross roundabout operates within capacity in the base position, although the A4226 Port Road West arm is close to capacity, particularly during the AM peak. The assessment also recognises that, given the relatively high level of traffic flows on each arm of the junction, there is a degree of peak hour congestion and delay, particularly during the AM peak on Port Road, with commuters travelling towards Barry, Penarth and Cardiff.

The STA and the site-specific Transport Assessment serve different but complementary purposes. The STA assesses the strategic and cumulative effects of the RLDP allocations across the wider highway network, while the site-specific Transport Assessment considers the detailed access and local highway implications of the North West Barry allocation. Both assessments recognise that Weycock Cross is a sensitive junction and that the impacts of future development need to be appropriately mitigated.

References to the total number of cars potentially owned by future residents do not represent the number of vehicles that would use the junction at any one time. Household travel patterns vary, not all residents travel during the highway peak hours, and not all journeys are made by private car. The site-specific Transport Assessment therefore uses forecast multi-modal trip generation rates derived from the Trip Rate Information Computer System (TRICS), which is a recognised UK database used for transport assessments. This indicates that the development would generate up to 162 two-way (arrivals + departures) vehicle trips in the AM peak and up to 170 two-way vehicle trips in the PM peak. These calculations are considered appropriate for assessing the likely peak-hour traffic effects of the allocation.

Temporary disruption from accidents, short-term traffic management and vehicle breakdowns can affect all parts of the highway network, particularly where junctions already operate close to capacity. The STA and site-specific Transport Assessment assess typical

operational conditions, rather than exceptional incident conditions, and identify mitigation where development traffic is forecast to have a material impact. The STA identifies that mitigation is required at Weycock Cross and Policy TR1 therefore identifies improvements to the roundabout as part of the transport infrastructure required to support the Plan.

Cardiff Airport and the emergency services were consulted on the Deposit RLDP and did not raise objections to the proposals. Detailed access arrangements, including the operation of the proposed site access and its relationship with Weycock Cross roundabout, will be considered further through the planning application process. This will include an updated Transport Assessment, detailed design and Road Safety Audit as required.

On this basis, the Deposit RLDP is supported by a robust and proportionate transport evidence base. The evidence recognises the existing sensitivity of Weycock Cross roundabout, assesses the likely impact of the proposed allocation and wider RLDP growth, and identifies the need for mitigation to ensure that the transport effects of development are appropriately addressed.

Issue - Site Specific Transport Assessment

- The TA relies on data a single day in September 2023 raises significant questions about its validity or real utility.
- Despite extensive technical looking data, the timing and methods of data collection remain opaque, raising concerns about the seriousness, accuracy and reliability of the traffic assessments.

Council response

The site-specific Transport Assessment uses a junction turning count undertaken on Tuesday 12 September 2023 between 07:00 and 19:00. This was a weekday during school term time and is an appropriate neutral survey day for the purpose of assessing typical weekday traffic conditions.

The junction turning count was not the only source of traffic data used. The Transport Assessment was also informed by a seven-day automatic traffic count undertaken on the A4226 at the site frontage between 13 and 19 September 2023, Google Maps average journey time data, on-site observations and further peak period journey time surveys undertaken in March 2025. These additional data sources were used to provide a broader understanding of local traffic conditions and to check that the manual count data were representative.

The survey data used for the North West Barry assessment and the associated Weycock Cross modelling are also consistent with traffic survey evidence submitted in support of other candidate sites in the area. This provides further confidence that the assessment is based on a representative understanding of local highway conditions.

In addition, Weycock Cross was separately assessed by the Council's transport consultants as part of the Strategic Transport Assessment. This ensured that housing and employment growth throughout the Vale of Glamorgan and the wider South East Wales region was robustly captured and analysed. This provides an additional plan-level check on the operation of the junction and the need for mitigation, separate from the site promoter's Transport Assessment.

The timing and methodology of the data collection are set out in the site-specific transport submissions and associated appendices, which include the relevant survey outputs and modelling information. The use of a weekday junction turning count, seven-day traffic count, journey time data, on-site observations and junction modelling is a standard and appropriate approach for preparing a Transport Assessment of this nature.

At this plan-making stage, the evidence is considered robust and sufficient to demonstrate that the allocation is capable of being delivered in transport terms, subject to further detailed assessment at planning application stage. Any future planning application for the site will need to be supported by an updated Transport Assessment, detailed design and Road Safety Audit as required.

Issue - Strategic Transport Assessment

- Despite extensive technical looking data, the timing and methods of data collection remain opaque, raising concerns about the seriousness, accuracy and reliability of the traffic assessments.
- Traffic from the Model Farm and Cardiff Airport sites together with the new college should be considered as part of the modelling.

Council response

The Strategic Transport Assessment sets out the data sources, modelling assumptions and assessment methodology used to assess the transport implications of the Deposit RLDP. The assessment utilises, and builds upon, the Transport for Wales South East Wales Transport Model.

The STA considers two principal forecast scenarios. The 2036 Base scenario includes forecast background traffic growth, derived from TEMPro/NTEM, which takes account of changes in population, households, employment, car ownership and economic activity. The 2036 RLDP scenario then adds traffic associated with the strategic housing allocations so that the cumulative impact of those sites can be identified and assessed against the future-year baseline.

This approach means that a robust allowance for wider growth associated with employment and other land uses, including growth in the Barry, Rhoose, Cardiff Airport and St Athan areas, is captured within the future-year background traffic forecasts. The strategic housing

allocations are then tested separately to identify their specific cumulative effect on the strategic highway network and to establish where mitigation is required.

The methodology of the STA is set out clearly in BP14 Stage 1 and BP14A Stage 2. This includes Technical Note 5, which explains the strategic modelling methodology, Technical Note 6, which presents the detailed junction capacity modelling, Technical Note 7, which identifies mitigation requirements, and Technical Note 8, which sets out the cost estimation and funding mechanism.

The STA identifies that mitigation is required to address the cumulative impact of the RLDP strategic housing allocations. Policy TR1 therefore identifies improvements to the roundabout as part of the transport infrastructure required to support the Plan. Further detailed Transport Assessments will also be required at planning application stage for individual developments to confirm site-specific access arrangements, detailed traffic impacts and any necessary mitigation.

Issue - Proposed mitigation

- Support for junction improvements.
- The Plan must show the improvements to be made, how they will be paid for and when they will happen and demonstrate the impact this will have on moving public transport quicker through the junction.
- Changes to the roundabout will make it more dangerous
- The proposed mitigation will not address the prospective increase in traffic.
- The mitigation measures are untested and totally unresearched.
- The roundabout should be replaced with traffic lights.
- It does not take into account the effect of the signalised junction and the delay it will cause.
- No preferred option is identified.
- The proposed road widening measures required to make the allocation accessible would have a significant impact on the wider transport network.

Council Response

The support for improvements to the junction is noted.

Technical Note 5 of the BP14A Strategic Transport Assessment (STA) sets out the methodology used to assess the capacity of the junction. The Transport for Wales South East Wales Transport Model (SEWTM) has been used to assess two scenarios: a base scenario and an RLDP scenario. The base scenario considers traffic in 2036, where forecast background traffic growth has been factored in, taking account of changes in population, households, employment, car ownership and economic activity, but RLDP strategic housing allocations have not been included. The RLDP scenario includes forecast traffic flows from new RLDP strategic housing allocations alongside growth in background traffic.

In the 2036 Base scenario, Junction 16 (Weycock Road/Port Road West/Pontypridd Road Roundabout) is forecast to experience capacity issues in both the AM and PM peaks. Without any intervention, this will be exacerbated by strategic housing traffic. The cumulative impact of RLDP developments will therefore necessitate improvements to the roundabout to prevent excessive queueing and delay, thereby justifying the need for mitigation.

Two mitigation options have been considered:

- Option A – Maximum widening (retain roundabout): Targeted widening of the roundabout entries, with localised lane-marking modifications to improve entry width, provide extended approach lanes, and increase circulatory capacity. The roundabout form is retained, and additional space is gained through modest land take at verges, all of which is within the adopted highway extents or land owned by the North West Barry site. The proposed mitigation scheme also includes active travel enhancements, comprising a new shared-use path and a controlled crossing on Pontypridd Road, to support safer and more accessible movement for pedestrians and cyclists through the junction.
- Option B - Partial signalisation: In addition to the widening works in Option A, Option B would introduce MOVA-controlled signals on the A4226 eastern and western arms. Queue loops and signal timings would be configured to ensure that non-signalised arms receive periods with extended gaps to enable queues to clear.

Feasibility designs for mitigation options at Weycock Cross roundabout are included in Appendix A and Appendix B of Technical Note 7 of BP14A Strategic Transport Assessment Stage 2. The STA recognises that further design stages and stakeholder engagement exercises are needed to progress the final design. However, the feasibility designs are proportionate to the requirements of the RLDP and demonstrate that a scheme is viable to a reasonable degree of certainty.

STA Technical Note 7 considers the impact of the Option A mitigation on queue length and capacity. The Option A results indicate that the proposed widening and lane-marking modifications could restore the junction to more favourable operation during the AM peak. The full details on the improvements to capacity and junction delay in both the AM and PM peak are detailed within the Technical Note, where it is concluded that the scheme could accommodate RLDP traffic growth without materially degrading performance.

The indicative cost of the scheme is detailed in the BP14A Strategic Transport Assessment – Technical Note 8. The cost estimates assume that the developer of HG1 KS1 Land at North West Barry will deliver those works directly related to their development. Improvements to Weycock Cross roundabout itself are anticipated to be funded through Section 106 contributions, including existing contributions already held by the Council for strategic

highway network improvements in the Barry area, together with additional contributions from RLDP allocated sites.

The mitigation measures are to be funded by Section 106 obligations and must therefore meet the statutory tests, namely that the obligation is necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development. On that basis, it would be reasonable to require developers to fund a proportionate level of mitigation related to the cumulative impact of RLDP sites on the roundabout, ensuring that new development does not worsen the baseline position at the time of the assessment. It would not be reasonable, however, to expect developments to fund mitigation for existing traffic congestion unrelated to the development.

On timescales, the Council already holds existing Section 106 funding for strategic highway network improvements in Barry, which could be used to progress more detailed design work. The mitigation works could then be delivered in stages, aligned with the payment of additional strategic highway contributions as individual RLDP sites are implemented and key Section 106 trigger points are reached. While most of the widening works fall within the adopted highway, the widening of the westbound carriageway of Port Road West will be dependent upon the timescales for the delivery of HG1 KS1 Land at North West Barry.

All engineering interventions at Weycock Cross will be subject to the full suite of Road Safety Audits in accordance with GG 119 Road Safety Audit. This will provide a multi-stage independent review of the road safety implications of the engineering interventions for all road users, including consideration of pedestrians, cyclists, public transport users, general traffic and the interaction between the roundabout, crossing facilities and any site access arrangements.

The Strategic Transport Assessment is, by design, a strategic-level exercise that tests the cumulative operation of Weycock Cross roundabout and the wider strategic highway network under the RLDP strategic housing allocations. The detailed operational assessment of the proposed HG1 KS1 Land at North West Barry site access junction and its interaction with Weycock Cross has been undertaken separately by the site promoter, and provides the site-specific level of detail that complements the strategic work.

The site promoter's Transport Assessment and subsequent technical work model the proposed signalised site access and Weycock Cross roundabout as linked junctions using industry-standard LinSig software. This detailed modelling demonstrates that the site access would operate within capacity and would positively regulate the release of development traffic onto Port Road West, rather than allowing site traffic to enter the main traffic stream under priority control. The site promoter's modelling has been scrutinised and accepted by the Vale of Glamorgan Council's highway officers, providing confidence that the proposed

access arrangements and their interaction with Weycock Cross have been robustly assessed and are acceptable in highway terms.

The proposed signal equipment would be under the control of the Council as Highway Authority and is expected to have MOVA control, allowing signal timings to respond dynamically to traffic conditions. This would reduce the likelihood of adverse interaction between the site access and Weycock Cross roundabout, for example by providing extended green time on the westbound approach when required.

The mitigation proposals have therefore been informed by the STA, feasibility design work, junction modelling and site-specific Transport Assessment evidence. The Deposit RLDP identifies the need for improvements to Weycock Cross roundabout, the supporting evidence identifies a tested plan-level mitigation approach, and the detailed design and delivery of the works will be secured through the planning application and Section 106 process.

Issue - Public transport implications

- Need to consider impact on public transport.
- There is no adequate provision for public transport.

Council Response

There are currently bus stops on both the eastbound and westbound carriageways of Port Road West. As part of any mitigation measures to be determined at the planning application stage of the strategic housing sites, the need to retain and, where appropriate, enhance existing bus stop provision will be considered.

It is recognised that there are no specific bus lanes in this area at present to allow bus services to bypass congestion, and that bus services are therefore generally subject to the same traffic conditions as other vehicles. However, the proposed mitigation measures seek to address additional congestion associated with new development and are expected to help improve journey time reliability for all traffic using the junction, including local bus services.

The mitigation proposals have been developed at a feasibility design stage and will be subject to further detailed design. The proposed capacity enhancements would also retain flexibility for the future introduction of bus priority measures, including bus lanes, if these are considered necessary, deliverable and complementary to the Vale of Glamorgan's wider transport strategy.

Sites will be required to make appropriate financial contributions to sustainable transport through the Section 106 process and therefore development could also facilitate improvements to public transport in the area. On this basis, it is not envisaged that the proposed allocation or the associated mitigation would have a material adverse impact on bus services.

Issue - Land ownership issues

- The mitigation scheme would require land in private ownership on Pontypridd Road.

Council Response

A representation has been made relating to the ownership of a small section of highway verge in front of a property on Pontypridd Road, which may be required as part of the widening for the roundabout mitigation scheme on the Pontypridd Road arm. The Highways Department have reviewed their records and the area in question, alongside the remainder of the verge, has formed part of the adopted highway since November 1956 and it is therefore the Council's position that this part of the mitigation scheme would not involve any third-party land.

TR1.7 HIGHWAYS IMPROVEMENTS – GILESTON ROAD JUNCTION, ST ATHAN

Two comments were made on the proposed highways improvements at Gileston Road. These representations seek clarification on the phasing of works and need and nature of the works. Each representation has received an individual response.

COMMENTS AND OBJECTIONS

6745 - Hallam Land Management – comment

Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.

Council Response

The Strategic Transport Assessment (STA) identifies the Gileston Road junction as one of the locations where mitigation is required to address the cumulative impact of the RLDP strategic housing allocations. It is therefore appropriate that Policy TR1 identifies this junction as a strategic highway improvement required to support the delivery of the Plan.

There are multiple proposed development sites in proximity to the Gileston Road junction which are expected to have an impact on its operation. The STA therefore identifies an indicative cost estimate and apportionment methodology so that relevant developments can make proportionate Section 106 contributions towards the junction improvement, based on their relative impact.

This approach is intended to support the delivery of development in a coordinated and proportionate manner. It ensures that all relevant developments that impact the junction contribute accordingly, rather than placing the full burden of mitigation on any single site. It also provides a mechanism through which early phases of development can come forward, where justified by site-specific Transport Assessment evidence, while securing contributions towards the strategic junction improvement.

The precise timing, phasing and trigger points for delivery of the Gileston Road junction improvement will be determined through the planning application process. Site-specific Transport Assessments will need to identify the level of development that can be accommodated before mitigation is required, the point at which the junction improvement or any interim measures are necessary, and the appropriate timing of Section 106 payments.

Any Section 106 obligations must meet the statutory tests, namely that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. The policy wording provides an

appropriate plan-level basis for securing necessary strategic highway mitigation, while allowing the detailed form, timing, phasing and delivery mechanism to be determined through planning applications and associated legal agreements.

7207 - Barratt Redrow Homes

Policy TR1 states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG1 KS4 the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Council Response

The Strategic Transport Assessment (STA) identifies the B4265/Gileston Road junction as one of the locations where mitigation is required to address the cumulative impact of the RLDP strategic housing allocations. The assessment is informed by the Transport for Wales South East Wales Transport Model (SEWTM), which forecasts that a high proportion of future RLDP traffic associated with the relevant strategic housing allocations would route through this junction. It is therefore appropriate that Policy TR1 identifies the Gileston Road junction as a strategic highway improvement required to support delivery of the Plan.

The STA provides a plan-level assessment of the need for mitigation, based on forecast 2036 Base and 2036 RLDP traffic conditions. The assessment identifies that the junction is forecast to experience capacity constraints and that the cumulative impact of the RLDP strategic housing sites would require mitigation. Technical Note 7 identifies a potential mitigation concept for the junction, while Technical Note 8 provides an indicative cost estimate and apportionment methodology for securing proportionate contributions from relevant sites.

The first phase of development is subject to a live planning application under the current LDP. The representation states that this phase has been designed so that it would not prejudice any future improvement works that may be required at the Gileston Road/B4265 junction. This matter will need to be confirmed through the determination of the live planning application, including review of the submitted layout, transport evidence and any land required to deliver future junction mitigation. The Council will need to be satisfied that any development coming forward under the current LDP would not compromise the ability to deliver mitigation required to support the RLDP growth strategy.

The RLDP allocation relates to later phases of development. The precise need, form, design, timing and phasing of any works to the Gileston Road/B4265 junction associated with later development will be considered through the relevant planning application process. This will

be informed by site-specific Transport Assessments, detailed junction modelling, design development, Road Safety Audit, the scale and phasing of development proposed, and any cumulative development already permitted or implemented.

The inclusion of the Gileston Road junction within Policy TR1 should not be read as requiring the full junction improvement to be delivered before any development can proceed. Rather, the policy provides the basis for securing proportionate mitigation where this is justified by the evidence. The timing and trigger points for delivery will be determined through planning applications and associated legal agreements.

Where justified, relevant developments will be expected to make proportionate Section 106 contributions towards the strategic junction improvement. Any such obligations must meet the statutory tests, namely that they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind.

The policy wording therefore provides an appropriate plan-level basis for securing necessary strategic highway mitigation, while allowing the detailed need, form, phasing and delivery mechanism to be confirmed through planning applications and associated Section 106 agreements.

TR1.8 HIGHWAYS IMPROVEMENTS – PEN Y TURNPIKE/LECKWITH ROAD JUNCTION, LLANDOUGH

One representation was received on the proposed highway improvements at Pen Y Turnpike/Leckwith Road Junction.

COMMENTS/OBJECTIONS

4466 - Scutt - Objection

Pen Y Turnpike/Leckwith Junction is busy and as stated it avoids congested routes which could be considered major. To add traffic lights at an acute angled junction will be difficult and will back up and slow traffic, as a strategy to reduce use this is short sighted. And again cycling up Pen Y Turnpike is hazardous and unless the proposal is to include new cycle lanes then it must only be stated for effect.

Suggested Change

1. Reduce use of Pen y turn pike by improving flow on the main Cardiff road for commuters.

2. Improve cycling links that actually work on Pen y turnpike, where it is currently hazardous.

3. Widening of PYT is probably not possible, and adding a cycle lane is not going to happen, why state this at the

Junction

4. With the addition of Key area HG1 KS2 and potentially sites 443/431/3838/369 This adds considerable loading.

Traffic flow needs to be improved, HG1 KS2 site adds another set of traffic lights, increasing use 250 houses, 250 plus cars potentially? forcing traffic back into DP, this will only lead to people using PYT as a shortcut increasing traffic.

To use Public transport use as a transport strategy going forward is short sighted unless flow is improved and car use is reduced, I see no sign this will change especially as people shift towards electric vehicles.

Council Response

The Strategic Transport Assessment (STA) identifies the Leckwith Road/Pen-y-Turnpike Road junction as one of the locations where mitigation is required to address the cumulative impact of the RLDP strategic housing allocations. The junction provides a route between the Vale of Glamorgan and western Cardiff and is recognised in the STA as a route that can be used to avoid congestion at other strategic junctions, including Merrie Harrier and Barons Court.

The STA assesses the junction under forecast 2036 Base and 2036 RLDP traffic conditions. The modelling identifies that the existing priority junction arrangement is forecast to operate

significantly over capacity, and that RLDP traffic would have a material impact on overall junction delay. It is therefore appropriate that Policy TR1 identifies the junction as a strategic highway improvement required to support the delivery of the Plan.

Technical Note 7 identifies a potential mitigation concept comprising conversion of the existing priority junction to a MOVA-controlled signalised crossroads. The purpose of the proposed signal control is not to encourage additional through traffic on Pen-y-Turnpike Road, but to provide a more controlled and equitable junction arrangement than the existing priority layout. Signal control is also expected to improve safety at the junction by providing dedicated phases for traffic movements, reducing reliance on drivers emerging from Pen-y-Turnpike Road having to identify suitable gaps at an acute angled junction. MOVA control would allow signal timings to respond dynamically to traffic conditions, helping to manage queues and allocate green time between approaches more effectively. The detailed safety benefits will be considered further through the detailed design process and Road Safety Audit.

The STA recognises that the junction is constrained and that the proposed mitigation would not remove all congestion, particularly during the busiest periods. However, the feasibility design and capacity modelling demonstrate that a proportionate mitigation concept is available to improve the operation and management of the junction when compared with the existing priority arrangement. The mitigation is therefore considered appropriate for plan-making purposes, subject to further detailed design.

The feasibility design includes advanced cycle stop lines on all approaches, which is considered good design practice for a signal-controlled junction and provides a suitable plan-level indication that the needs of cyclists have been considered within the mitigation concept. Given the constrained nature of Pen-y-Turnpike Road, the STA does not assume the delivery of a segregated cycle route along the corridor as part of this junction improvement. The detailed design will nevertheless need to consider the safety and operation of the junction for all users, including pedestrians and cyclists, through the normal design process and Road Safety Audit.

The suggestion that traffic flow should instead be improved on the main Cardiff Road corridor is noted. The STA considers the wider strategic network, including Merrie Harrier and Barons Court. Those junctions are already significantly constrained under forecast future-year conditions, and the STA concludes that large-scale localised highway mitigation at those locations would be disproportionate to the additional impact of the RLDP strategic housing allocations. Wider improvements to strategic movement between the Vale of Glamorgan and Cardiff will require continued regional coordination with relevant transport bodies.

The traffic associated with HG1 KS2 Land to the North of Dinas Powys has been assessed as part of the STA. The potential access arrangements for that site will be considered through

the planning application process and will require a site-specific Transport Assessment. The identification of mitigation at Leckwith Road/Pen-y-Turnpike Road provides a mechanism for addressing the strategic highway impact of cumulative RLDP growth, while detailed site access, local traffic impacts and active travel provision will be considered at planning application stage.

Any final scheme will be subject to detailed design, junction modelling, Road Safety Audit and the normal planning application and legal agreement processes. Where justified, relevant developments will be expected to make proportionate Section 106 contributions towards the strategic junction improvement, subject to the statutory tests for planning obligations.

The policy wording therefore provides an appropriate plan-level basis for securing necessary strategic highway mitigation, while allowing the detailed form, design, active travel provision, phasing and delivery mechanism to be confirmed through later technical work.

RETAIL, COMMERCIAL AND SERVICE CENTRES

This section addresses the representations made on the Retail, Commercial and Service Centre policies in the Plan:

- SP11 Retail, Commercial and Service Centre Hierarchy
- SP12 Retail Floorspace Provision
- SP12 (1) Land at Church Farm, St Athan
- SP12 (2) Land at Bridge House Farm
- RSC1 Resilient Retail, Commercial and Service Centres
- RCS2 Edge of Centre and Out of Town Retailing
- RSC3 Hot Food Takeaways

SP11 – RETAIL, COMMERCIAL AND SERVICE CENTRE HIERARCHY

A total of 7 representations were received on SP11 Retail, Commercial and Service Centre Hierarchy (1 support, 4 comments 2 objections).

Statutory consultees raised the need to consult South Wales Police on relevant applications, reference to supporting local food retailers and supply chains and the need to safeguard essential public services within town centres. Other representors commented on the need to upgrade town centres and the position of specific centres within the retail hierarchy and the relationship between the settlement and retail hierarchies.

STATUTORY CONSULTEE RESPONSES

6681 - South Wales Police – Secured by Design Officer - Comment

South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.

Council Response

The comment is noted. The Council will continue to consult with the Designing Out Crime Officer on appropriate planning applications.

6720 - Cardiff and Vale University Health Board – Comment

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer supply chains. This limits opportunities for strengthening local food economies. It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for 'local affordable food' outlined in SP5.

Suggested Change

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

Council Response

Policies SP11 and RCS1 are specifically designed to establish and maintain a clear retail, commercial and service centre hierarchy and to support the vitality and viability of designated centres. Their primary role is to direct main town centre uses to the most appropriate locations and ensure that centres continue to function effectively in planning terms. Introducing detailed provisions relating to local food markets, cooperative retail models, or producer supply chains would extend the scope of these policies beyond their core strategic land-use purpose.

The planning system has limited ability to control or promote specific retail formats, ownership models, or supply chains (such as cooperatives or local producer networks), as these are largely influenced by market forces and operational business decisions rather than land use considerations. Including such detailed or prescriptive requirements could reduce flexibility and may not be effective in practice.

Notwithstanding this, the Council is supportive in principle of initiatives that improve access to affordable and locally sourced food. These can be more appropriately delivered through complementary strategies, partnership working, regeneration initiatives, and town centre management activities, rather than through strategic land-use planning policies.

On this basis, it is considered that SP11 and RCS1 remain appropriate and accord with national policy without the need for the suggested addition.

6944 - Penarth Town Council - Comment

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

Members felt that potential functional support that could be provided could include:

• The appointment of a Town Centre Manager

• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.

• Using existing or emerging new powers, such as compulsory purchases.

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

Suggested Change

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

Council Response

The Council notes the comments regarding Penarth's designation as a Service Centre and the challenges posed by a move away from in-person retailing. However, the primary retailing and shopping role is still prominent particularly in the town centres of the Vale and its role as a service centre is key with services making up 52.4% of the total units as of 2023, as demonstrated in BP13 – Retail and Leisure Study, higher than the UK average. BP13 also demonstrates further evidence of Penarth's classification in the Retail hierarchy and its role including its second highest comparison turnover after Holton Road and the third highest overall in turnover in the Vale. Evidence from the study also results in the movement of Penarth to town centre status with its role serving a significant area including smaller neighbouring towns and numerous suburbs.

The designation of Penarth in the hierarchy does not seek to preserve a retail function only, however. As set out in paragraph 6.202 under policy SP11, the Council explicitly recognises that the role of traditional town centres is changing and that their futures may involve repurposing and creating multi-functional centres to meet community needs.

Policy RCS1 further supports this approach encouraging development proposals that enhance the vitality, vibrancy and attractiveness of Retail, Commercial and Service Centres. It supports a broad mix of complementary uses at ground floor level including non-retail uses. Repurposing is therefore already reflected in Policies SP11 and RCS1 which can be supported and community engagement enhanced through using Placemaking Plans which have been committed to being produced in collaboration with local communities as noted in paragraph 6.213.

In respect of the safeguarding of essential services, Policy CI4 sets out the policy framework for the consideration of applications that would result in the loss of community facilities. However, it is not within the scope of the RLDP to make resource allocation decisions that require a specific service or facility to remain operational within an area.

This is also the case with the functional measures that have been suggested, as these largely fall outside the remit of the RLDP as a land use planning document.

INDIVIDUAL RESPONSES

SUPPORT

5672 – Entwistle – Support

I support any attempt to revitalise and improve Barry town centre/Holton road. I support improvements to infrastructure and projects aimed at making the area a nicer place to spend time/shop. I think the council should do more to actively encourage new retailers, both major brands and small local businesses. Can deals on lower business rates be offered to attract new retailers? Can the old Wilkinson shop be used a location for small pop up stalls for local crafts and businesses or as a space for a weekly market and other events?

Council response

Support is noted. Deals on business rates and the specific uses of existing retail units are not at the discretion of the planning department or a matter of the RLDP.

The Council have recently purchased the Wilko store on Holton Road and a report was considered by Cabinet in June 2026, which set out that the ground floor is proposed to be redeveloped into a flexible indoor market concept to support town centre regeneration and economic activity.

COMMENTS/OBJECTIONS

4985 – Reed - Object

I would suggest that Rhoose is a neighbourhood centre with most residents needing to travel to Barry or Llantwit Major for most goods.

Suggested Change

Change Rhoose to a neighbourhood centre.

Council Response

Fontygary Road retail centre in Rhoose has been categorised as a 'Local Centre' in the retail hierarchy. The Council considers Local Centres as those providing essential shops, services, businesses and community facilities to a surrounding community including nearby villages and hamlets as defined by Nexus in their Retail Assessment of the Vale of Glamorgan retail centres contained in BP13. Neighbourhood Centres are considered those that provide essential shops and services to its immediate residential area. It is considered that Fontygary Road is of a size and composition that more appropriately matches the local centre category including convenience stores, a café, doctors' surgery, dental practice and various other uses. Additionally, as the only retail centre in Rhoose, the centre would provide essential services and shops to the surrounding community of Rhoose rather than just its immediate

residential area. As is the case with other 'Local Centres' such as The Square, St Athan and Dinas Powys Village Centre. Fontygary Square is also considered to provide the nearest essential services for surrounding villages and hamlets including East Aberthaw and Penmark.

It is recognised that residents from Rhoose will still have to travel to Barry for more services and goods. These would be contained within retail centres higher in the hierarchy including town and district centres, which serve neighbouring villages and towns, as well as to retail outlets falling under edge and out of town retail centres in policy RCS2.

5044 – Hussey - Comment

Look after the town. Make sure it is upgraded and not left to slowly deteriorate.

Suggested Change

Put the needs of the local population first

Council Response

The comments are noted. The RLDP policy framework seeks to support the vitality and viability of town centres.

7017 – Lidl GB Ltd (Carney Sweeney) - Object

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.

The adopted LDP Settlement Hierarchy lists:

- Key Settlement: Barry
- Service Centre Settlements: Cowbridge, Llantwit Major and Penarth

The adopted LDP Retail hierarchy lists:

- Town centres: Barry
- District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth

Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.

However, draft SP11 lists a retail hierarchy as follows:

- Town Centres – Barry (Holton Rd), Penarth, Cowbridge
- District Centres – Barry (High Street), Llantwit Major

It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.

The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.

Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

Council Response

Policies SP11 – Retail, commercial and service centre hierarchy and SP2 – Settlement Hierarchy, are both distinct policies and will not necessarily mirror each other. The retail hierarchy is determined by the size, scale, function, catchment and market performances of a retail centre. The settlement hierarchy identifies the broad distribution of development based on role and function of each place. It effectively determines where the focus of future development will be directed and the level of development appropriate for the places identified in each level of the settlement hierarchy. It is not a requirement, nor would it be appropriate, for the retail hierarchy to replicate the settlement hierarchy.

The upgrading of Cowbridge to Town Centre level in the retail hierarchy is supported by the Council's evidence base in BP13 – Retail and Commercial Leisure Study (Nexus Planning, 2023) that recommends Penarth and Cowbridge are promoted and supported by the following evidence:

- Cowbridge was identified to have 150 retail units compared to circa 100 in Llantwit Major 100.
- The comparison good market share stands at 8.3% in Cowbridge compared to 1.5% in Llantwit Major.
- Cowbridge's health check assessment found it had a more diverse mix of facilities catering to a wider catchment area. Comparatively, Llantwit Major is noted to be somewhat lacking in leisure services and retail.
- Llantwit Major is stated to have a comparison offer that is adequate for the centre of its size, but its convenience offer is lacking.

The Council acknowledges Llantwit Major's population size and access to a train station. However, the retail hierarchy is not determined by these factors alone.

The comments in respect of allocations are dealt with in response to Policy SP12.

SP12 – RETAIL FLOORSPACE PROVISION

Two representations were received on the overall Retail Floorspace Provision policy. One representation raised concerns about the lack of retail provision in the Flemingston ward of St Athan. The other considers that additional retail floorspace provision should be made in the Penarth/Llandough area.

INDIVIDUAL RESPONSES

COMMENTS/OBJECTIONS

6584 – Haines - Object

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.

Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:

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

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

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

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

Suggested Change

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

Council Response

Policy SP12 already makes specific provision for convenience retail floorspace to serve the housing growth in the St Athan area through the allocation at Church Farm providing 1,858 sqm of gross floorspace as an integral part of the residential allocation on policy HG1 KS4. The intention for this is to reduce the need for existing and new residents to travel long distances to other settlements to meet basic retailing needs.

The St Athan ward is constituted of three community wards: Gileston, St Athan and Flemingston. The Council notes that the primary focus of housing growth is concentrated in the St Athan community ward rather than the Flemingston community ward. This is also

where the retail floorspace is allocated to serve the increase in demand. Additionally, the retail allocation at Bridge House Farm, Llanmaes would provide retail opportunities. There are bus and active travel routes between Flemingston and both proposed foodstores.

Whilst it is recognised that mixed use development is a key element of placemaking, not every site is suitable for a mix of uses, and this must be balanced with viability and deliverability. The two housing allocations in the Flemingston ward are relatively small in scale (80 and 51 units each), with both being proposed for affordable housing led schemes, delivering much needed affordable housing in the ward. If a proposal were put forward which includes a small scale retail element as part of the housing development, this would be acceptable in principle, but it would need to be demonstrated that it is viable and that it would not reduce the net developable area of the site.

The provision of retailing at a scale to serve the local needs of a neighbourhood would be acceptable in principle under Policy RCS2 on Edge of Centre and Out of Town Retailing.

7018 – Lidl GB Limited (Carney Sweeney) - Object

Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification. In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).

It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified. Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llantwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.

Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173– 2,753sqm net unmet/unallocated. We

note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.

Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement. Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:

- In-centre,
- Edge-of-centre, and only then,
- Out-of-centre locations that are accessible and well-connected to the catchment.

Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.

Suggested Change

Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13. Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.

The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach.

Council Response

The Council welcomes support for the retail floorspace allocation at land at Bridge House Farm, Llanmaes.

Background Paper BP13 Retail and Leisure Study, prepared by Nexus, identifies a quantitative capacity for additional convenience floorspace of up to 5,862 sq m net for the Vale of Glamorgan as a whole, as reflected in Policy SP12. It is important to note that the

Nexus report does not disaggregate this capacity figure by zone so there is no specific capacity identified for Zone 5 - Penarth.

The report does refer to the potential need for a medium to large sized supermarket within Penarth town centre. Paragraph 12.25 recommends the Council considers if and how the identified convenience floorspace could be accommodated with the town centre. Importantly, it does not prescribe that if the need cannot be met in the town centre, then provision should be made elsewhere in the wider Penarth area and there is no reference to Llandough being a suitable alternative location if need cannot be met in Penarth town centre itself.

Policy SP12 allocates two sites for new retail stores at Llanmaes/Llantwit Major and St Athan.

In May 2026, after the completion of the Deposit RLDP consultation, a hybrid planning application was submitted for Land at Church Farm, St Athan. The application included outline details for a class A1 retail foodstore of up to 20,000 sq ft. This equates to the 1,856 sq m that had previously been identified. In the retail assessment that supports the application, it was highlighted that the figure of 1,856 sq m related to the gross floor area, whereas the net sales area was proposed to be up to 1,400 sq m.

The headline capacity figure in Policy SP12 is up to 5,862 sq m net floorspace and figure provided for Land at Bridge House Farm also relates to net floorspace. To ensure consistency across the policy, it is proposed that Policy SP12.1 be amended to include a net floorspace figure of up to 1,400 sq m rather than the gross figure of 1,858 sqm. This will also result in consequential changes to paragraph 6.209, Policy HG1 KS4 and paragraph 6.99.

With this revision, provision has been made for 2,651 sq m net of the floorspace for which there is capacity. The representor raises concern that there is a 'residual' quantitative capacity that is unmet/unallocated. The representor calculates this to be 1,173– 2,753sqm net. However, with the revision to the capacity at St Athan, this would between 1,641 and 3,211 sq m net. The representor raises concern that this unmet need has not been addressed through allocations and indicates that this should be addressed within the Zone 5 catchment area.

It should be noted that a planning application for a discount supermarket on a brownfield site in Barry (2025/01296/FUL) was submitted in December 2025. The application will be determined against the adopted LDP. If approved, it would contribute a third retail allocation that would likely bring the overall provision closer to reaching the overall required figure set out in policy SP12 and BP13.

Policy SP12 is clear that the remaining convenience floorspace should be delivered through opportunities within existing town and district centres, including regeneration schemes, in

accordance with the town centre first policy. This allows for a degree of flexibility to respond to opportunities that may arise during the plan period.

The Nexus report states "*any inability to accommodate the identified floorspace within the above centres, does not automatically result in the need to allocate out-of centre sites. Such an approach is unlikely to address the qualitative shortcomings of these centres and would not ordinarily improve the vitality and viability of these centres*."

The Council has noted the submission of a new out of centre site for a potential foodstore as part of the Deposit RLDP consultation process in the wider Zone 5 area. This was accompanied by limited supporting information and did not include evidence of a sequential test to consider the availability of alternative suitable sites in Penarth. In the context of Policy requirements, it is not considered appropriate to allocate this site for additional retail provision.

Change required

To ensure consistency across the policy, the floorspace capacity of Land at Church Farm, St Athan, should be amended from up to 1,858 sq m gross floor area to up to 1,400 sq m net floor area. This will also result in consequential changes to paragraph 6.209, Policy HG1 KS4 and paragraph 6.99.

It is not proposed to allocate the new site proposed by the respondent in the Zone 5 area.

SP12 (1) - LAND AT CHURCH FARM, ST ATHAN

Representation ID	Respondent Name	Representation Type
4879	Mr Tim Brown [3000]	Object
5097	Mr Tim Brown [3000]	Object
5856	Mr Jeff Smith [3399]	Object
5901	Mrs Louise Jenkins [2079]	Comment
6497	Mr Neil Jenkins [2729]	Object
7108	Barratt Redrow Homes [2669]	Support
7001	Dwr Cymru Welsh Water [1741]	Comment

A total of 7 representations from 6 individual representors were submitted in respect of the allocation of Retail Floorspace Provision – Land at Church Farm, St Athan, raising a number of issues associated with the development of the site.

The key concerns raised in respect of the allocation relate to the need for additional retail provision within the area, the impact on existing local business and retail centres, the suitability of alternative uses for the site, the availability of alternative locations for retail development, the absence of safeguards to prevent the retail unit becoming additional housing and the impacts on the local highway network, including the proposed access arrangements.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions.

STATUTORY CONSULTEE RESPONSES

7001 – Dwr Cymru Welsh Water

The site is located within the boundary of HG1 KS4 Land at Church Farm.

Council Response

Comments noted. Please refer to the Council's composite response to the key issues raised in relation to allocation HG1 KS4 Land at Church Farm.

INDIVIDUAL RESPONSES

SUPPORT

7108 – Barratt Redrow Homes (Turley) - Support

The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Council Response

Support is noted.

COMPOSITE RESPONSE

Issue - Location

- Wrong location within the development – would be better placed in the Phase 2 access point onto the coast road to increase passing trade and remove the bottle neck from the village.
- It should be provided near the petrol station, accessed by a new roundabout.

Council response

The Council acknowledges the comments and concerns raised in respect of the provision of Retail Floorspace in St Athan.

The proposed retail foodstore is a component of the Phase 1 development at Church Farm, which is allocated as a housing site in the adopted LDP and forms part of the wider Church Farm allocation in the proposed RLDP. It is worth noting that Phase 1 of Church Farm is currently the subject of a live planning application. As such, the responses relating to this site reflect the circumstances and information available at the time of writing this report. Consequently, certain aspects of these responses may be subject to change as the planning application progresses and further information becomes available. Verbal updates can be provided through subsequent political processes if necessary.

However, it is anticipated that all traffic generated by the proposed development, including the residential dwellings and proposed foodstore, will access the site via Gileston Road, as agreed with the Local Highway Authority. As shown on the indicative masterplan, it is envisaged that vehicular access will be provided from the B4265 during the Phase 2 development.

Formal consultation has taken place with Highways on the Phase 1 application, and discussions are ongoing regarding highway and road safety concerns.

In regard to the location of the proposed retail unit, it is noted that in the illustrative masterplan for the placemaking event that took place in October 2024, the food store was shown in the north west corner of the site. Although the Council acknowledges concerns with the location of the retail unit, the layout presented in the pre-application enquiry showed the store located directly behind the listed war memorial which presented concerns regarding the setting of the memorial. This has subsequently been amended following pre-application discussions.

The adopted LDP sets out a retail hierarchy, with St Athan: The Square being identified as a 'Local Centre.' A map of the retail centre boundary is set out in Appendix 6 of the LDP. The boundary of the site is less than 100m from the local centre boundary. TAN 4 states that when edge of centre locations are being considered, development proposals should be located next to a designated retail and commercial centre boundary, and where this is not the case it should not normally be more than 200 to 300 metres from the edge of the centre. The location of the food store to the north west of the site better accords with this

guidance, given the much closer proximity (less than 100m) of the site to the retail boundary than the location shown in the pre-application enquiry.

Furthermore, the location of the store and its associated parking closer to the school could offer the potential for the retail store car park to be used as drop off parking for the school, which is something that has been successful elsewhere in the Vale. This would be subject to agreement from the relevant parties.

The relocation of the retail foodstore back to the north of the site has also allowed for this south western corner to be designed in a manner that enhances the setting of the war memorial. Whilst the Historic Environment assessment considers that the proposed development will alter the setting of the war memorial, it will only represent a negligible negative impact on its significance. This conclusion reflects the design approach, which aims to retain views of the memorial from the southwest, including the distance from the retail element and the green corridor located immediately behind the war memorial.

Issue – Alternative Uses for the site

- A DIY store should be provided instead as the nearest ones are at Bridgend or Culverhouse Cross.
- A garage should be provided for automotive repairs and MOT station as residents currently need to travel to Llantwit or Barry.
- Concern that the A1 retail unit would be converted to housing in the future.

Council response

Although the Council notes suggestions regarding alternative uses of the site, the proposed retail provision has been informed by the identified retail need set out within the Nexus Study, together with representations received during the Preferred Strategy consultation as well as the RLDP's support for the integration of retail floorspace within mixed-use developments, in line with placemaking principles. The remaining convenience floorspace identified under Policy SP12, together with comparison retail provision, should be delivered through opportunities within existing town and district centres, including regeneration schemes, in accordance with the Town Centre First policy.

Should planning permission be granted, development of the site would be required to proceed in accordance with the approved plans. The retail provision is also proposed for allocation under RLDP Policy SP12 and constitutes a key component of the HG1 KS4 allocation. Consequently, any future proposal seeking an alternative use of the site would be subject to assessment against the development plan and may be contrary to future planning policy.

Issue – Need for Retail

- The village is adequately served by three food shops.
- Another food shop will be harmful to well established businesses.
- Lidl are coming to Llanmaes and this will be detrimental to St Athan village food businesses.
- There is no shop at East Camp.
- Another post office isn't needed.

Council response

In response to the Preferred Strategy consultation that took place between December 2023 and February 2024, the Council received comments that raised concerns with the lack of shops in St Athan and the subsequent need to travel outside the area to access food shopping. Specific comments were made regarding the need to set aside land in the development for additional retail units. In response to these comments, the Initial Consultation Report stated that the Council would consider how services and facilities could be provided alongside housing proposals in St Athan to improve accessibility and would hold community engagement sessions on key housing sites to help identify local priorities and aspirations.

Following the Preferred Strategy consultation, a placemaking-focussed consultation event was held in October 2024 to present the emerging development proposals and obtain feedback from the local community. A class A1 retail foodstore was included in these proposals to enhance local services in response to the feedback provided to the Council during the consultation on the Preferred Strategy. The public had the opportunity to have their say on these proposals during the placemaking and Deposit Plan consultations as well as during the pre-application consultation (PAC) process. The responses received as part of the PAC process are addressed in the applicant's PAC report submitted by Turley in support of the planning application.

It is acknowledged that the need for additional floorspace as per the adopted LDP requirement to 2026 has been met. However, as part of the evidence base for the RLDP, an updated Retail and Leisure Survey was undertaken by Nexus in June 2023, which looked to provide the Council with an up-to-date objective assessment of retail and leisure development needs in the Vale. This study concludes that in the period to 2036, in quantitative terms, there is a need of between 4,282 sqm and 5,862 sq m of convenience floorspace.

Despite not meeting the need threshold for a Retail Impact Assessment specified in TAN 4, a full RIA has been submitted as part of the phase 1 Church Farm planning application which directly addresses the policy context, including the 'tests' of retail impact and need identified in PPW and TAN 4. It considers that as the proposal is of broadly similar size and nature to the Lidl foodstore application in Llanmaes and are only located a relatively short distance apart, it is reasonable to anticipate that they will primarily serve the same Primary Catchment Area (PCA). The RIA is therefore largely based upon the Lidl household survey, the economic tables contained within the Lidl PRS prepared by Carney Sweeney and assumptions regarding trade draws informed by the retail audit of the PRS undertaken by the Council's retail consultant at Nexus. We consider that this approach is justified and appropriate to the proposal's location and scale, and responds to the points raised during pre-application discussions.

In terms of impact on local businesses and trade, in its consideration of the Lidl application in Llanmaes, Nexus concluded that in spite of the foodstore having an estimated impact of -11.9% on Llantwit Major District Centre (which was identified within its own trade diversion analysis), and whilst it was regrettable that the Lidl proposal may result in a loss of some trade from the in-centre Co-op and Filco stores, it was considered that this could not be

considered an ‘unacceptable impact’. In Nexus’ view, the stores in Llantwit Major would continue to attract a small amount of main food shopping but their primary purposes were as top up shopping destinations, related to a pass-by and walk-in trade which would enable them to remain viable. Therefore, it is reasonable to apply a similar analysis to St Athan, considering that currently only 0.1% of overall spend on convenience shopping in the study area (the majority of the Vale of Glamorgan) takes place in St Athan, indicating a significant ‘leakage’ with the majority of residents currently travel outside of St Athan for food shopping.

The assessment demonstrates that existing stores within the catchment area retain only a small proportion of residents’ main food shopping expenditure, with most spending taking place at stores outside the area. Therefore, the provision of a main foodstore on the application site would reduce the length of unnecessary journeys made, especially by car, which would have significant sustainability benefits.

Although nearby top-up shopping facilities in St Athan are likely to experience levels of trade diversion as the largest convenience stores closest to the site, these are also located in edge/out-of-centre locations and the turnover analysis does not take into account the increase in top-up shopping trade which may be experienced as a result of the increase in residential expenditure and expansion across St Athan as a whole. It is further noted that the proposed store's comparison goods turnover represents only a small proportion of forecast spending growth within the catchment area and is therefore not expected to have a significant impact on existing retailers or centres.

Additionally, the site’s proximity to St Athan Local Centre could potentially result in an increase in pedestrian linked trips, especially from the wider residential development and generate positive spin-off for other businesses in the centre.

In terms of cumulative impact, as highlighted in the supporting text of RLDP Policy SP12, the application for 1,251 sqm of new convenience floorspace that was submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major has been called in for determination by Welsh Ministers. The allocation of this land will depend upon the outcome of this call in, when a decision has been issued by Welsh Ministers.

Although the outcome of the Lidl application in Llanmaes is currently unknown, the RIA discussed above demonstrates that by virtue of their limited top-up shopping offer, smaller centres within the PCA are not forecast to experience any individual or cumulative impact as a result of the foodstore proposal.

In qualitative terms, the Nexus study states that there is potential need for a medium to large supermarket in the town centres of Barry Holton Road, Penarth and Llantwit Major. It concludes that if the identified floorspace cannot be met within the town centres this does not automatically result in the need to allocate out-of-centre sites as this will not ordinarily improve the vitality and viability of the centres. Therefore, a sequential site assessment was undertaken as part of the RIA to consider the availability and suitability of alternative sites within and at the edge of Llantwit Major and Cowbridge district centres, as well as the local centres of St Athan and Fontygary Road, Rhoose. Whilst there were a number of vacant units identified in both the Llantwit Major and Cowbridge district centres, none would be large

enough to accommodate the proposed development, even when considering a level of flexibility. Therefore, no available or suitable sites to accommodate a foodstore within the PCA of the proposal were identified.

The Council acknowledges that the East Camp estate does not currently benefit from a local shop. However, the allocated sites in this area are located close to existing community facilities, including a community centre and community café. Furthermore, the proximity of the proposed foodstore to St Athan Local Centre provides an accessible and sustainable shopping destination for local residents and may potentially result in increased pedestrian linked trips, especially from the wider residential development and generate spin-off for other business in the centre. The policy framework in RLDP Policy SP12 recognises that the provision of such floorspace has the ability to reduce the need for existing and new residents to travel to other settlements to serve their needs.

The RLDP does not include any proposals or site allocations for a Post Office within St Athan or the surrounding area.

It should be noted that Policy SP12(1) referenced the gross floor area for the site rather than the net floor. To ensure consistency across the policy, the floorspace referenced under the allocation should be amended from 1,858 sq m to up to 1,400 sq m.

Proposed Change

To ensure consistency across the policy, the floorspace capacity of Land at Church Farm, St Athan, should be amended from up to 1,858 sq m gross floor area to up to 1,400 sq m net floor area. This will also result in consequential changes to paragraph 6.209, Policy HG1 KS4 and paragraph 6.99.

SP12 (2) – LAND AT BRIDGE HOUSE FARM, LLANMAES, LLANTWIT MAJOR

Representation ID	Respondent Name	Representation Type
4707	Mrs Shirley Williams [1695]	Object
4818	Councillor Gwyn John [204]	Object
4865	PER Consulting (Mr Keith Thomas, Director) [987]	Object
4890	Mrs Linda Green [1072]	Object
5155	Mr Roger Drye [1614]	Object
5159	Mrs Shirley Williams [1695]	Object
5239	Mr and Mrs John & Patricia Harries [3186]	Object
5257	Llantwit Major Town Council (Clerk) [230]	Support
5321	Mrs Carol Watts [3231]	Object
5339	Mr Darren Green [3236]	Object
5383	Mrs Carmel Meredith [3245]	Object
5431	Mr Chris Moreton [1338]	Object
5435	Mr Chris Moreton [1338]	Object
5444	Mr Darren Williams [2292]	Comment
5570	Ms Samantha Hall [1432]	Object
5638	Mr Derek Massey [3323]	Object
5652	Mr Eamonn McGreevy [3326]	Object
5673	Mrs Laura McGreevy [3330]	Object
5730	Mr Graeme Smith [3029]	Object
5736	Mrs Linda Green [1072]	Object
5748	Mrs Jacqueline Wright [3349]	Object
5768	Rik Stevens [3360]	Object
5779	Mrs Sue Stevens [2287]	Object
5812	Mr Paul Garvey [3241]	Object
5827	Mrs Julie Massey [3390]	Object
5830	Mrs Caroline Smith [3388]	Object
5871	Ms Ann Barnaby [1702]	Object
5939	Mrs Susan Tandy [1626]	Object
5948	Mrs Janet Harris [1846]	Object
6024	Mr & Mrs Alison and Richard Leach [2143]	Comment
6028	Mr Richard Cobourne [3440]	Object
6052	Mr Philip Taylor [3439]	Object
6071	Andrew Jack [3465]	Object
6101	Richard Hughes [3475]	Object
6126	Ms Ann Barnaby [1702]	Object
6143	Ms Ann Barnaby [1702]	Object
6146	Ms Ann Barnaby [1702]	Object
6205	Mr Colin Arnold [2871]	Object
6210	Mr Phil Tandy [1625]	Object
6226	Mrs Jan Arnold [3499]	Object
6257	Mr Noel Harris [2148]	Object
6267	Mrs Bethan Pocock [3268]	Object
6296	Robert Turner [3525]	Object
6335	Richard Leach [3544]	Comment
6366	Mervyn Page [3558]	Object
6373	Mr Hayden Pocock [3561]	Object

6377	Mrs Jaqueline Hughes [3563]	Object
6388	Llanmaes Community Council (Mrs C Alexander, Clerk) [240]	Object
6409	Mr David Harris [2291]	Object
6417	Mrs Julie Garvey [3578]	Object
6638	Mr Richard Cobourne [3440]	Object
7002	Dwr Cymru Welsh Water [1741]	Comment
7028	Mrs Bethan Pocock [3268]	Comment
7206	Lidl GB Limited [1459]	Support
7225	Ms Samantha Hall [1432]	Object

A total of 55 representations (2 support, 4 comments, 49 objections) were submitted by 46 individual representors in respect of the allocation of Retail Floorspace Provision – Land at Bridge House Farm, Llanmaes, Llantwit Major, raising a number of issues associated with the development of the site.

The key concerns raised in respect of the allocation relate to compliance with local and national planning policy on development in the open countryside, the impact on existing local businesses and retail centres, the consideration of alternative sites, the impact on placemaking in terms of sustainable locations for development, its effect on the setting of a Conservation Area and its exclusion from the proposed Green Wedge.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions.

STATUTORY CONSULTEE RESPONSES

7002 – Dwr Cymru Welsh Water - Comment

Dwr Cymru Welsh Water has made representations on planning application ref 2022/00907/FUL.

Council Response

Comments noted.

5257 – Llantwit Major Town Council - Support

We note the land between Llantwit Major and Llanmaes should serve as a green wedge and the provision of retail floorspace, both of which are appropriate.

Council Response

Support is noted.

6388 – Llanmaes Community Council - Object

Llanmaes Community Council objects to this designation noting that it as a tentative designation pending a decision on a Called in Planning Application). Amongst the reasons for

this objection include the resulting visual and physical coalescence of the Town of Llantwit Major and Village of Llanmaes. This site is also unsuitable for a large development on this scale as it is situated outside the RLDP's defined Strategic Growth Area. The proposed supermarket will be highly incongruous within the setting of the proposed Green Wedge although we understand the reasons for this tentative allocation pending a decision to accept or refuse the Called in Planning Application. Finally, the large store and supporting structures would be major and significant intrusions into the countryside and would be clearly detrimental to the Llanmaes Conservation Area as detailed and specified in its adopted Management Plan.

Council Response

The matters raised are addressed under the composite response below.

INDIVIDUAL RESPONSES

SUPPORT

7206 – Lidl GB Limited - Support

Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.

COMPOSITE RESPONSE

COMMENTS AND OBJECTIONS

Issue – Prematurity

- The allocation is premature whilst an appeal is ongoing.

Council Response

A planning application (2022/00907/FUL) for the erection of a Class A1 foodstore was considered by the Council's planning committee, where it was resolved to approve the application. The application was, however, subject to a call-in request for determination by the Welsh Ministers. An Inquiry was held in June 2026 and the decision is currently awaited.

The main issues in the call-in request are whether the proposed development conflicts with national policy on development in the open countryside, the impact on placemaking in terms of sustainable locations for development, its effect on the setting of a Conservation Area, and whether a sequential search was followed in accordance with town centre first policies.

As the timescales for the decision on the call-in are unknown it would not have been appropriate to delay the consultation on the RLDP until such time as a decision was made.

The supporting text for Policy SP12 recognises the current position in respect of the call-in stating "*There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by the Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by the Minister*."

The inclusion of the site in the Deposit RLDP afforded residents the opportunity to make representations on the allocation through this RLDP process alongside the planning application process.

Issue – Historic Environment

- Llanmaes has many listed buildings, including a church from 1234.
- The proposed foodstore would impact on the conservation area.
- The Conservation Area Management Plan references maintaining green spaces

Council Response

The impact of the development on the historic environment was considered as part of the planning application.

The application is supported by a Heritage Assessment. This concludes that the proposals in terms of physical effects have potential to encounter archaeological features within the site and recommended further investigation. In terms of non-physical effects, the statement details that the proposed development 'would not alter the setting of any historic assets such that it would have no effect on an asset's significance.'

It is recognised that the Llanmaes Conservation Area boundary is only circa 75 metres to the north of the site at its closest point. The officer's report for the planning application concludes that "*the proposals would likely have significant detrimental impacts upon the character of the countryside, the Llanmaes Conservation Area and result in the coalescence of Llantwit Major and Llanmaes. To this end the proposals are considered to be at odds with the provisions of Policies MD1, MD2 and MD8 of the Local Development Plan*."

Notwithstanding these concerns, when the matter was considered at planning committee, members of the committee considered that the positive benefits of the proposal outweighed the impacts.

The issue of impact on the historic environment was considered as part of the recent Inquiry and the outcome of this is awaited.

Issue - Impact on Recreation

- The village is a recreational area for cyclists, walkers, horse riders and people of all abilities.

Council Response

The concerns are noted. As part of the planning application, a contribution towards improvements to sustainable transport will be secured. This would be used to make improvements within the vicinity of the site, such as enhanced pedestrian and cycling

facilities (not including those proposed to facilitate safe access to the site) and/or updating existing public transport infrastructure.

Issue – Availability of Alternative Sites

- The site of the old NAAFI shop near East Camp, St Athan should be used instead.
- The site should be built off the Northern Access Road where it would better service the residents of Llantwit Major, St Athan, Llantwit Major and Cowbridge by way of a major road.

Council Response

The sites that have been identified as alternatives are both owned by Welsh Government and are identified in the RLDP for other uses. The former NAAFI site forms part of a Major Employment Allocation (Policy SP14(3)) at Bro Tathan Business Park. The land at the Northern Access Road is allocated for housing, within two of the three parcels having outline planning permission (subject to s106) for residential development.

Issue – Flooding

- There is an issue with flooding in Llanmaes.
- The proposed flood alleviation scheme is required.

Council Response

The site is not within an area at risk of river, sea, surface water or small watercourse flooding. Notwithstanding this, the application is supported by a Flood Consequences Assessment that has been considered by the Council's Drainage Section and NRW, and no related objections have been received from either party. Furthermore, the Council's Drainage section in consideration of the separate SAB application advise 'from the details provided we offer no objection in principle to the proposed drainage scheme subject to our comments above.'

The Council notes comments made in respect of a Flood Alleviation Scheme in Llanmaes. The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation.

Issue – Suitability of Location

- The proposal would lead to urban sprawl.
- It would lead to physical and visual coalescence between Llanmaes and Llantwit Major.
- A large foodstore would be a significant intrusion into the countryside.

- The site is outside of the RLDP's strategic growth area.
- The proposal contravenes the Council's Wellbeing Objectives set under the Wellbeing of Future Generations Act.
- The boundary of Llanmaes will change in May 2027 and it will no longer be part of Llantwit Major.
- The site was put forward in a previous LDP for a retail store and was refused by the Planning Inspector.

Council Response

The matters of the suitability of the site and impact on the countryside are considered in detail within the planning application officer's report. It is recognised that the introduction of a development of this size would inherently result in an urbanising addition and would reduce the gap and sense of openness between Llantwit Major and Llanmaes. This matter was considered as part of the recent Inquiry and the outcome is awaited.

It is noted that the site is on the periphery of the strategic growth area as defined in the RLDP Key Diagram.

Any future changes to local administrative boundaries would not impact on how the site is considered in planning terms.

The site was submitted as an alternative site as part of the adopted LDP process. At that time, it was the opinion of the Council that there was no requirement for further retail allocations within the Plan. The Council's Hearing Statement considered that evidence submitted at that time was qualitative evidence rather than the quantitative evidence required to support additional retail provision. The Inspectors Report for the LDP states "*I have little information before me to assess the implications of such an allocation on the vitality and viability of existing centres. As such, and on the balance of the evidence available, I am not satisfied that the retail allocation sought has been thoroughly justified as a Plan allocation. Nevertheless, should evidence become available to support such a proposal, a scheme could be progressed through the plan period in accordance with the sequential approach set out in national policy and the provisions of Policy MG13, referred to above*."

<u>Issue – Impact on Biodiversity</u>

- The site is part of a rich and diverse wildlife corridor.
- Surveys have found otters in the area.

Council Response

The planning application was supported by an Ecological Survey, which identifies that the site predominantly comprises of poor semi-improved grassland, with an intact species poor hedgerow running around the site, with tall ruderal vegetation to the southern boundary, in addition to large trees to the south-east corner of the site and a large sycamore to the northern boundary.

The application was also supported by a Green Infrastructure Plan which details areas of replacement hedgerow and reinforced tree planting that would be provided through the

site, in addition to wetland habitats and swales that would form part of any SAB submission. The officer's report concludes that subject to a suitable suite of conditions, the site could be developed in a manner that would minimise and achieve suitable mitigation and compensation within the site. Additionally it could provide suitable mitigation for habitat loss and enhancement of those to be retained. As such the proposals are considered to comply with the provisions of PPW and of Policy MD9 of the LDP in this regard. No adverse comments were received from NRW.

Issue – Retail Need, Sequential Test and Impact

- More detailed consideration is needed on sequential test
- Town centre locations would be more sustainable in terms of walkability and public transport.
- Allocation of out of town retail does not accord with sustainability policies
- It would impact on existing businesses in Llantwit Major town centre.

Council Response

The latest Vale of Glamorgan Retail and Leisure Study (June 2023) provides an updated quantitative need and qualitative assessment of both convenience (food), comparison goods (clothing, electronic items etc.) and town centre leisure uses such as bars, cafes, and restaurants across the authority. The study identified that over the plan period to 2036, there is qualitative capacity for between 4,282 and 5,862 sqm net of convenience food retail floorspace, depending on the type of convenience goods provider. There is also capacity for between 432 sqm net and 679 sqm net of comparison floorspace, depending on the nature of the comparison goods. Spatially, the study identifies the potential for additional convenience food retailing within the retail centres of Barry, Penarth and Llantwit Major. The report recommends that this would lead to improvements in the vitality and viability of these centres, whilst also recognising a general qualitative need for encouraging a diverse range of uses within the Vale's main town and district retail centres.

The matter of retail need has been considered in detail as part of the planning application process where it was concluded following a review by the Council's appointed consultants "*on the basis of the information available and the conclusions of the Council's appointed consultants, it is considered that the proposals would broadly comply with the provisions of Policy MG13 and that of PPW in terms of demonstrating capacity and the sequential test*." Again, this matter was reviewed during the Planning Inquiry and the outcome is awaited.

Issue – Green Wedge

- The green wedge should include the site of the proposed foodstore.

Council Response

A number of respondents have also made comments on the green wedge designation, and this has been addressed under the response to Policy DNP2 Green Wedges (DNP2.6 Between Llantwit Major and Llanmaes).

Issue – Highways Safety

- Accidents have already taken place at the traffic lights and the proposal will exacerbate this.
- It would be dangerous for pedestrians.
- The route through the village is well used by cyclists and pedestrians, including school children.
- There is a riding school close to the junction.
- The majority of shoppers will drive to the store rather than walk.
- There will be an increase in traffic on Picketston Lane. This was not considered as part of the Aston Martin application.

Council Response

The planning application was supported by a Transport Assessment (TA) prepared by Corun and updated in May 2023, which have been considered by the Council's Highway Development Officers. Following extensive discussions through the application process, the highways department ultimately raised no objections to the proposal.

The proposals would include the provision of a 3.5m shared footway/cycleway along the frontage of the site and would also include off-site works including the provision of two new toucan-controlled crossing points to connect the site to existing active travel provision and assist with pedestrian movements across the B4265 and Llanmaes Road. Llanmaes Road is also noted as being widened to circa 7.3m south of the proposed access point.

Highways also raised no concerns in respect of Picketston Lane. While the comments regarding the traffic impacts associated with Aston Martin are acknowledged, the site forms part of the Major Employment Allocation (Policy SP14(3)) at Bro Tathan Business Park. Accordingly, any future planning proposals within this allocation will be subject to appropriate highway and transport considerations.

RCS1 – RESILIENT RETAIL, COMMERCIAL AND SERVICE CENTRES

Three representations have been received (1 support, 1 comment, 1 objection) on Policy RSC1 Resilient Retail, Commercial and Service Centres.

The key issues raised that the policy should provide greater clarify on marketing requirements, how over concentration will be considered and reference to supporting local food retailers and supply chains.

STATUTORY CONSULTEE RESPONSES

6721 - Cardiff and Vale University Health Board - Comment

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer supply chains. This limits opportunities for strengthening local food economies. It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for 'local affordable food' outlined in SP5.

Suggested Change

Consider adding: "The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chain within town and service centres, in line with the Town Centres First approach."

Council response

Policies SP11 and RCS1 are specifically designed to establish and maintain a clear retail, commercial and service centre hierarchy and to support the vitality and viability of designated centres Their primary role is to direct main town centre uses to the most appropriate locations and ensure that centres continue to function effectively in planning terms. Introducing detailed provisions relating to local food markets, cooperative retail models, or producer supply chains would extend the scope of these policies beyond their core strategic land-use purpose.

The planning system has limited ability to control or promote specific retail formats, ownership models, or supply chains (such as cooperatives or local producer networks), as these are largely influenced by market forces and operational business decisions rather than land use considerations. Including such detailed or prescriptive requirements could reduce flexibility and may not be effective in practice.

Notwithstanding this, the Council is supportive in principle of initiatives that improve access to affordable and locally sourced food. These can be more appropriately delivered through

complementary strategies, partnership working, regeneration initiatives, and town centre management activities, rather than through strategic land-use planning policies.

On this basis, it is considered that SP11 and RCS1 remain appropriate and accord with national policy without the need for the suggested addition.

6943 - Penarth Town Council - Support

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

Council Response

Support is noted.

INDIVIDUAL RESPONSES

COMMENTS/OBJECTIONS

7020 – Lidl GB Ltd (Carney Sweeney) - Object

The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that: "Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:

- Details of the existing use or previous use if vacant;
- The length of time the unit has been vacant, if applicable;
- The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
- The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."

However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.

We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

Suggested Change

The Policy text should explicitly state to include 12 months of marketing activity as a requirement as the supporting text currently reads. Criterion 5 should also define what an over-concentration of non-retail uses would be in order that the policy is clear and effective.

Council Response

The concerns of the representor are noted, and the Council agrees that it would be appropriate to elevate the requirement for 12 months marketing from the supporting text to the policy itself through the inclusion of an additional criterion:

It can be demonstrated that the unit has been appropriately marketed.

It is considered that it remains appropriate to provide the explanation of what is meant by appropriately marketed in the supporting text.

The Council recognises that policy RCS3 – Hot Food Takeaways sets specific concentration limits while Policy RCS1 currently does not. The Council would note however that the over-concentration of non-retail uses is inherently more context-specific than hot food takeaway concentration, given the diverse range of uses and centre types that RCS1 applies to. Additionally, the retail study in BP13 makes the recommendation to remove non-retail use concentration limits from the primary and secondary frontages in town and district centres which they were previously applied to. The Council has followed this guidance and in addition produced BP47A – Retail Centre Uses that identifies the proportion of each use class in each retail centre in the Vale of Glamorgan and proposes monitoring to be done over the course of the plan period to keep updated on the proportion of various use in retail centres to deem whether a restriction on the concentration of non-retail uses is required.

However, it is considered that there would be merit in specifically referencing this monitoring within the supporting text for the policy to provide clarity on how the over-concentration criterion of the policy would be interpreted.

Proposed Change

Amend Policy RCS1 to improve clarity and to elevate the marketing requirement from the supporting text to the policy as follows:

Development proposals, including those identified through Placemaking Plans, that enhance the vitality, vibrancy, and attractiveness of Retail, Commercial, and Service Centres will be supported.

Proposals involving the change of use at ground floor level uses from A1 retail use will ***be*** *permitted where the proposal* ~~*would*~~*:*

*1 Support****s*** ~~*the*~~ *vitality and vibrancy of the town centre by generating footfall and economic activity;* ***and***

2 ~~*Be*~~ ***is*** *compatible with surrounding uses and the commercial character of the centre;* ***and***

3 ***Would*** *not result in adverse amenity impacts;* ***and***

*4 Provide****s*** *an active frontage;* ***and***

*5 Avoid****s*** *an over-concentration of non-retail uses that would undermine the retail function of the centre;* ***and***

6 It can be demonstrated that the unit has been appropriately marketed.

Proposals for A3 Hot Food Takeaways must also comply with Policy RCS3.

Residential and other complementary town centre uses above ground floor level will be supported, provided they do not result in unacceptable impacts on the operation of ground floor uses or the amenity of existing and/or proposed occupiers.

An additional sentence will be included in Paragraph 6.215 as follows:

Non-A1 retail proposals within a retail centre will be carefully controlled to ensure that the viability and vitality of retail centres are not adversely affected by an over concentration or clustering of non-A1 retail premises. Given the diversity and individual characteristics of each local centre, the Council shall annually monitor the proportion of retail and non-retail within centres in accordance with the proposed RLDP monitoring framework to inform the suitability of proposals for non-A1 uses.

A new indicator will also be introduced in Appendix 3 Monitoring Framework.

RCS2 – EDGE OF CENTRE AND OUT OF TOWN RETAILING

Three representations were received on Policy RCS2 Edge of Centre and Out of Town Retailing (1 support, 1 comment and 1 objection).

The key issues raised were consultation with South Wales Police and the suggested rewording of the policy to reference the sequential test.

STATUTORY CONSULTEE RESPONSES

6683 - South Wales Police – Secured by Design Officer - Comment

South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them in edge of and out of town retail centres.

Change Proposed: Not specified

Council Response

Comments are noted. South Wales Police are statutory consultees on all relevant planning applications.

INDIVIDUAL RESPONSES

SUPPORT

5584 – Hall - Support

This shows how the approval of the Lidl in Llanmaes contravenes your own principles and it is out of town A1 food store. I fully support this proposal and wish that the members of the planning committee were aware of their own policies before their made such an horrendous decision to approve the planning application.

Council Response

Support is noted. The respondent has also made comments on retail allocation SP12.2, which are dealt with under that policy.

COMMENTS/OBJECTIONS

7014 Lidl GB Limited (Carney Sweeney) - Object

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:

1. “It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and

2. The proposal would not either individually or cumulatively, with other recent or proposed consented developments, have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.

3. The proposal would serve local needs in a neighbourhood or rural village."

Suggested Change

We consider this policy wording should be changed. The policy should read as follows:

"1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and

2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.

3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres."

Council Response

It is considered that the wording of criterion 1 of the policy already achieves the same policy outcomes as those proposed by the respondent. The requirement to demonstrate that additional need cannot be met within an existing retail centre is an expression of the sequential approach.

It is noted that no changes are proposed in the wording to the second criterion.

The suggested rewording of criterion 3 introduces a reference to the impact on neighbourhood centres. It is considered that criterion 2 already sets this out, requiring that a proposal would not have an unacceptable impact on the vitality and viability of other designated retail, commercial and service centres. Neighbourhood centres are within the Retail, Commercial and Service Centre hierarchy, and it is therefore the case that criterion 3 would apply to them.

RCS3 – HOT FOOD TAKEAWAYS

Two representations were received on Policy RCS3 on Hot Food Takeaways. One was a representation of support and the second was requested that the policy be amended to include an initial criterion on demonstrating access to equitable access to health food outlets, community growing facilities and other community food infrastructure within walking distance of new residential areas.

STATUTORY CONSULTEE RESPONSE

6723 - Cardiff and Vale University Health Board - Comment

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Suggested Change

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA guidance.

Council Response

Support is noted. The Council recognises the importance of access to healthy food and the role it can play in addressing health inequalities. The Plan, through Policy SP5 Creating Healthy and Inclusive Places and Places, already references ‘enabling opportunities for access to a healthy food environment’. The proximity to services and facilities, which would include a range of retail facilities, is a key component of the plan.

Policy RCS3 is a specific policy setting out the measures to control the number of hot food takeaways, rather than a policy to ensure new developments are sited in locations with good access to healthy food. It is therefore not considered appropriate to include the suggested change, particularly as this is covered by other policies in the Plan.

INDIVIDUAL RESPONSE

<u>SUPPORT</u>

5585 – Hall - Support

There is supposedly a cost of living crisis, but there is also a health crisis in this country fuelled by poor food choices. I fully support the proposal to limit take away premises within the vale.

Council Response

Support is noted

COMMUNITY INFRASTRUCTURE

This section addresses the representations made on the Community Infrastructure related policies in the Plan:

- SP13 Community Infrastructure and Planning Obligations
- CI1 Open Space Provision
- CI2 Protection of Existing Open Spaces
- CI3 New Community Facilities (allocated sites CI1.1-CI1.6)
- CI4 Protecting and Enhancing Existing Community Facilities
- CI5 Cemetery and Crematorium Provision

POLICY SP13 COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

A total of 15 duly made representations were made in respect of Policy SP13 on Community Infrastructure and Planning Obligations, submitted by 12 different representors. Six of the representations were in support of the policy, with the others making comments or raising objections. The issues raised include the necessity of the policy, references to community growing areas, timescales for delivery and the specific requirements for Welsh language contributions and the mitigation of recreational pressure in the Severn Estuary. There are also mixed views on whether viability should be a consideration when determining planning application, with developers supporting the reference to viability, and others raising concerns that it invites developers to challenge requirements.

Individual responses to each representation are provided below.

STATATUTORY CONSULTEE RESPONSES

6727 – Cardiff and Vale University Health Board – Comment

SP13 Community infrastructure and planning obligations: We want to take this opportunity to highlight the challenges that population growth places on healthcare services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure.

Please refer to the information provided as part of the background evidence paper titled 'BP37 Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new developments to take forward its strategic objectives.

Council response

The comments are noted. The Council will continue to maintain regular dialogue with the Health Board on these matters.

6967 - Dwr Cymru Welsh Water – Comment

We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.

Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.

The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.

Council response

The comments are noted. The Infrastructure Plan (BP44) provides further information on Dwr Cymru Welsh Water's requirements

INDIVIDUAL RESPONSES

<u>SUPPORT</u>

5674 – Entwistle

I support these points but the council needs to work better to actually action their own plans.

Council response

Support is noted. The comment around delivery is noted.

5859 – Smith

Delivery of new or improved infrastructure must be undertaken in a timely and coordinated manner to meet the needs of existing and planned communities *prior to* the commencement of any development.

Council response

Support is noted.

While the timely and coordinated delivery of infrastructure is important, it would not be reasonable or practicable to require all necessary infrastructure to be delivered prior to the commencement of development. The infrastructure required to support a development can vary significantly in scale and type, and in many cases is appropriately delivered in phases alongside the development itself as needs arise. Requiring all infrastructure to be provided before development begins could adversely affect the viability and deliverability of schemes and may delay the provision of much-needed housing and other development.

The policy already seeks to ensure that infrastructure is delivered in a timely and coordinated manner to support existing and planned communities. The precise timing of infrastructure delivery is most appropriately determined on a site-by-site basis through the development management process, planning conditions, legal agreements and infrastructure delivery mechanisms, taking account of the nature of the development and the infrastructure required.

6032 - Barratt Redrow Homes (Lichfields)

The inclusion of the allowance for development viability in Policy SP13 is endorsed. It is vital that the Council take account of development viability when considering community infrastructure and planning obligations. To not do so, could jeopardise whole allocations which would undermine the delivery of much needed affordable and market housing in VoG. With regards to Affordable Housing Led Allocations, care needs to be taken to ensure that any additional planning obligations beyond the affordable housing are carefully considered in terms of overall viability. As drafted, Policy SP13 is consistent with PPW and meets the three tests of soundness.

Council response

Support is noted.

The RLDP is supported by an evidence base which includes a high level viability assessment (BP42), which factors in realistic assumptions for planning obligations. Individual sites, including the affordable housing led sites, have also been subject to site specific viability assessments, which it is demonstrated that they are viable.

6077 - Barratt Redrow Homes (Lichfields)

The inclusion of development viability considerations in Policy SP13 is endorsed. The need to balance additional planning obligations with overall viability is essential to prevent jeopardising housing delivery. Policy SP13 aligns with PPW guidelines, ensuring that

community benefits are reasonably related to developments and do not compromise site deliverability. It is considered that Policy SP13 as drafted meets the three tests of soundness and supports the delivery of affordable and market housing in VoG.

Council response

Support and comments are noted.

7109 - Barratt Redrow Homes (Turley)

We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.

Council response

Support is noted.

7195 - H Jones, L Sungur and P John (Herbert R Thomas)

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported.

Council response

Support is noted.

COMMENTS/OBJECTIONS

5368 – Taylor – Object

There needs to be more weight given to the different types of food growing spaces that can be provided in association with new development - large or small, commensurate to the size of development. We need to move away from the view we should ask for growing spaces only on larger housing sites. Community allotments are fine but we also need smaller blank canvass spaces for food growing that communities can take ownership of. These are not capital intensive asks. We need to raise awareness of the different types of food growing spaces that can be provided.

Council response

Policy SP13 is a strategic policy which sets out the type of community infrastructure that may be required as part of new development. 'Community growing spaces such as allotments' are referenced under this policy. Whilst allotments are given as an example, other types of community growing spaces can fall within this remit. As SP13 is a high level strategic policy, it would not be appropriate for the policy to list every potential type of growing space. This is a detailed matter that will be addressed through an updated Planning Obligations SPG.

5914 – HBF – Comment

The requirement to provide welsh language facilities is considered onerous. How would a developer provide Welsh language facilities as part of a development? What would this mean in practice, and for how long would they be required? The HBF suggests that a contribution towards Welsh Language improvements would be more appropriate, and would allow for an instance, a financial contribution to support existing facilities. Such an approach is common across other LDPs.

In terms of the Welsh Language, the Council's Background paper BP30 concludes: 'The evidence presented in this background paper demonstrates that the Welsh language, while an important part of Wales's cultural heritage, does not hold a position of significant cultural prominence within the Vale of Glamorgan and that the RLDP is unlikely to materially influence the status, use or vitality of the Welsh language within the area.'

This would suggest that the requirements of the plan should not be overly onerous.

Concerning employment opportunities, the use of the phrase 'complementary facilities' is very vague. With regard to the example of the provision of training and working hubs, it is unlikely to be achievable on the scale of the developments proposed in the plan. A contribution towards such facilities in the wider area is likely to be more achievable, helping support existing facilities, rather than creating more that last only for the length of the development.

Mitigation of Severn Estuary Recreational Pressure: It would be helpful in the supporting text to reference Policy DNP8 SEVERN ESTUARY RECREATIONAL PRESSURE. Is there any information available on how this will be calculated?

Council response

Policy SP13 seeks to ensure that the infrastructure and facilities necessary to support sustainable communities are provided where they are required as a consequence of development. This may include Welsh language facilities where evidence demonstrates that a development would create or exacerbate a need for such provision.

The policy does not require developers to directly provide or operate Welsh language facilities themselves. The nature, scale and form of any contribution would be considered on a case-by-case basis, taking account of the impacts of the proposed development, the evidence of need, and relevant legislative and policy requirements. Where justified, mitigation could include either the provision of facilities or financial contributions towards the enhancement of existing Welsh language infrastructure and services.

As a strategic policy, SP13 is not intended to prescribe the detailed mechanisms through which infrastructure will be secured. These matters would be considered through the development management process and agreed through planning obligations where they satisfy the relevant statutory tests. The policy therefore provides sufficient flexibility to secure appropriate mitigation while recognising that the most effective approach may vary depending on the circumstances of each development.

The term ‘complementary facilities’ is intentionally broad to provide flexibility in responding to the varying employment and skills needs arising from different forms and scales of development. As a strategic policy, SP13 is not intended to prescribe specific infrastructure requirements in detail, as these will vary depending on the nature, location and impacts of individual proposals.

The reference to training and working hubs is provided as an example of the types of facilities that may be appropriate in certain circumstances and is not a requirement for all developments. The Council acknowledges that the direct provision of such facilities may not be feasible or justified for every scheme. Where a need is identified as a result of development, mitigation could take a variety of forms, including financial contributions towards the enhancement, expansion or delivery of existing employment, training and skills facilities within the local area.

The Council is preparing a Severn Estuary Recreational Pressure Strategy, which will detail the cost of providing appropriate mitigation measures (known as SAMM - Strategic Access Management and Monitoring) and how this will be divided between dwellings within the core recreational catchment area.

6138 – Taylor – Object

SF&G disagree with the current wording that begins with 'where appropriate and having regard to viability,' as it invites developers to argue this does not apply to their site. We suggest changing it to state that the Council aims to secure high-quality community infrastructure, facilities, and services appropriate to the development’s scale, type, and location with site viability a consideration. Community growing spaces should be provided, and references to allotments should be deleted, encouraging developers to create spaces of appropriate size with minimal capital costs (enabling 'community ownership'). The preferred approach remains on-site provision of facilities and infrastructure.

Suggested Change

Include text that suggests provision of food growing facilities commensurate to the size and nature of development. large capital outlays are not always necessary to enable community ownership of spaces next to their homes.

Council response

Paragraph 4.2.22 of Planning Policy Wales is clear that “*where up-to-date development plan policies have set out the community benefits expected from development, planning applications which comply with them should be assumed to be viable and it should not be necessary for viability issues to be considered further. It is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage*.” However, the paragraph does go on to state that exceptional circumstances could include where further information on infrastructure or site costs is required or where a recession or similar significant economic changes have occurred since the plan was adopted.

As the RLDP is a 15 year plan, it is appropriate for the plan to reference viability as a consideration to account for potential exceptional circumstances. It is noted that the representation goes on to suggest a rewording. However, the rewording still highlights that viability would be a consideration.

With regards to community growing spaces, the respondent states that the reference to allotments should be deleted and developers should be encouraged to provide appropriately sized community growing spaces instead.

Policy SP13 is a strategic policy which sets out the type of community infrastructure that may be required as part of new development. 'Community growing spaces such as allotments' are referenced under this policy. Whilst allotments are given as an example, other types of community growing spaces can fall within this remit. As SP13 is a high level strategic policy, it would not be appropriate for the policy to list every potential type of growing space. This is a detailed matter will be addressed through an updated Planning Obligations SPG.

Policy SP13 already references that community infrastructure should be appropriate to the scale, type and location of proposed developments. Given that requirements will be site specific, it is not considered that it will be appropriate to mandate that there must be provision for food growing facilities on every site, as there will be potential implications on the net developable area. As above, this is a matter for an updated Planning Obligations SPG.

6586 - Haines – Object

Policy SP13 refers to securing infrastructure through planning obligations. However, reliance on financial contributions alone does not ensure timely delivery. There is insufficient clarity regarding:
- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

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

Suggested Change

Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.

Council response

The RLDP evidence base includes Background Paper on Education (BP43), Primary, Community and Intermediate Health Care (BP37) and a two stage Strategic Transport Assessment (BP14/BP14A). There is also an Infrastructure Plan (BP44) which sets out site specific requirements and likely timescales for the delivery of specific infrastructure.

While the timely and coordinated delivery of infrastructure is important, it would not be reasonable or practicable to require all necessary infrastructure to be delivered ahead of housing occupation. However, it is normally the case that contributions are secured in tandem with occupation, with set trigger points for contributions to be made written into the Section 106 agreement.

The policy already seeks to ensure that infrastructure is delivered in a timely and coordinated manner to support existing and planned communities. The precise timing of infrastructure delivery is most appropriately determined on a site-by-site basis through the development management process, planning conditions, legal agreements and infrastructure delivery mechanisms, taking account of the nature of the development and the infrastructure required.

6786 - Persimmon Homes (Boyer Planning) - Object

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

Council response

The Council does not agree that Policy SP13 is unnecessary. The policy provides the overarching strategic context within the LDP for securing the infrastructure necessary to support sustainable growth.

The policy establishes a clear link between the scale and location of development proposed in the Plan and the need for supporting infrastructure, facilities and services. In doing so, it provides certainty to developers, decision-makers, infrastructure providers and local communities regarding the Council's expectations for infrastructure delivery and the role of development in addressing its impacts.

Policy SP13 also reflects national planning policy requirements that development should be supported by appropriate infrastructure and enables infrastructure considerations to be embedded within the spatial strategy of the Plan. Without a strategic policy, there would be no clear framework within the LDP for coordinating infrastructure provision with planned growth or for identifying the broad range of infrastructure that may be required to support sustainable communities.

6919 - Barratt Redrow Homes (Boyer Planning) - Object

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

Council response

The Council does not agree that Policy SP13 is unnecessary. The policy provides the overarching strategic context within the LDP for securing the infrastructure necessary to support sustainable growth.

The policy establishes a clear link between the scale and location of development proposed in the Plan and the need for supporting infrastructure, facilities and services. In doing so, it provides certainty to developers, decision-makers, infrastructure providers and local communities regarding the Council's expectations for infrastructure delivery and the role of development in addressing its impacts.

Policy SP13 also reflects national planning policy requirements that development should be supported by appropriate infrastructure and enables infrastructure considerations to be embedded within the spatial strategy of the Plan. Without a strategic policy, there would be no clear framework within the LDP for coordinating infrastructure provision with planned growth or for identifying the broad range of infrastructure that may be required to support sustainable communities.

7110 - Redrow Barratt Homes (Turley) - Comment

It must be recognised in the policy or supporting text that the delivery/timing of some infrastructure measures will be outside the control of developers/developments. This is particularly the case where financial contributions are made, and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Council response

The comment is noted. The policy refers to the timely delivery of infrastructure. It is acknowledged that where financial contributions are secured, the delivery of the necessary infrastructure is the responsibility of the others, including the Council. The Council publishes a Section 106 update annually which provides a transparent account of what has been secured and how it has or will be spent.

CI1 – OPEN SPACE PROVISION

A total of 17 duly made representations were made on Policy CI1 (4 support, 8 comments, 5 objections).

Whilst there was support for the policy objective of ensuring that new development makes provision for open space, some concerns were raised. Key issues included clarification on the increased levels of open space per 1000 population compared to the requirements of the adopted RLDP, the necessity of providing an open space strategy for sites above a certain threshold, and the need for greater flexibility and proportionality. Conversely, one representation seeks less flexibility and the provision for open space to be largely provided on site unless there is clear justification that this is not possible.

STATUTORY CONSULTEE RESPONSES

6728 - Cardiff and Vale University Health Board - Comment

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present there does not appear to be a full Open Space assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Council Response

The Open Space Background Paper (BP31) provides an audit of existing open space provision in the Vale, as well as forming the baseline for Vale-specific standards. The Background Paper also considers playing pitch provision as part of this assessment.

The Council has been working with the Health Board on the Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities Audit Report and welcomes its completion, as it is agreed that this will form an important part of the wider evidence base, particularly in relation to indoor sports facilities.

INDIVIDUAL RESPONSES

<u>SUPPORT</u>

5675 - D Entwistle (3264)

I support this provision of open space but think more stipulations should be in place in terms of the form it takes. An open field is fine but open space should also include areas of habitat for native animals and plants and be planned in a way that encourages residents to spend time appreciating and enjoying the viewing of these natural habitats. There should also be a move towards more natural, sustainable green spaces suitable for native wildlife as opposed to very manicured fields and gardens.

Council Response

Support of policy CI1 is noted. Requirements regarding inclusion of habitat spaces, wildlife and natural value is included under policy SP19 – Green Infrastructure. Additionally, further guidance on how open spaces should be designed will be included in Supplementary Planning Guidance (SPG) to ensure spaces encourage and facilitate use. It is recognised that a variety of open spaces including those usable by the public and those for wildlife is required and CI1 includes informal open space and natural and semi-natural greenspaces as options in providing additional open space in new developments. This combined with the policies set out in SP19 encourage development of these types of spaces.

7078 - Barratt Redrow Homes (Highlight Planning)
7113 - Barratt Redrow Homes (Turley)
7196 - H Jones, L Sungur and P John (Herbert R Thomas)

- 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.
- The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.
- Provision of open space in residential developments is supported.

Council Response

Support is noted.

COMMENTS/OBJECTIONS

5398 - Taylor - Comment

I support the policy but suggest refining the wording. It should emphasise that open space must largely be provided on-site, with clear justification required if not possible, and off-site provision should be as close as possible. Financial contributions are a last resort. For other open spaces, provision should be designed locally and respond to needs, with encouragement for community growing spaces, due to their high returns on investment and social benefits, including community cohesion, crime reduction, and social value.

Council Response

Support is noted. The wording of the policy, as it relates to on-site provision, and the supporting text reflect the adopted LDP Policy MD3: Provision for Open Space. It is considered that the existing adopted LDP policy is being successfully implemented and, therefore, it is not necessary to amend it as suggested.

The respondent wishes to see a hierarchy of open space provision, with on-site provision as the preference, followed by off-site provision, and with commuted sums as a last resort. The Council agrees that on-site provision is the preferred approach; however, where this is not

practical, the Council supports the use of commuted sums to secure enhancements within the local area.

The Council has a strong track record of utilising Section 106 funding to improve provision, and the wording of the policy provides sufficient flexibility to continue this approach where on-site provision cannot be delivered.

7197 - H Jones, L Sungur and P John (Herbert R Thomas)

The viability of developments must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

Council Response

The provision of open space is not a new policy requirement, and applicants should therefore already be aware of site-specific requirements when bringing forward viable schemes. The provision of open space is also a key component in ensuring that development supports placemaking principles.

As the applicant notes, Policy SP13, the overarching policy on community infrastructure and planning obligations, already references the need to consider viability when securing such infrastructure. There is flexibility within the policy framework to allow for the consideration of viability in the round across all obligations, rather than solely in relation to open space. Furthermore, the plan is informed by a robust viability study, which considers the cumulative impact of all requirements, including open space provision, in determining appropriate policy expectations. Viability challenges should therefore be regarded as the exception rather than the norm.

In light of the fact that viability is addressed in the strategic planning obligations policy, it is not considered necessary to duplicate this within Policy CI1.

6746 - Hallam Land Management (Savills) – Comment
6847 Taylor Wimpey (Savills) - Comment

- Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.
- Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Council Response

Policy MD3 of the adopted LDP (2017) sets out a requirement for 1.6 ha of open space per 1,000 population, 0.25 ha of children's play space per 1,000 population, and 0.55 ha of informal play space per 1,000 population. This totals 2.4 ha of open space per 1,000

population. This is based on evidence from the 2013 Open Space Background Paper. The requirements in MD3 reflect the benchmark Fields in Trust (FIT) standards referenced in Technical Advice Note (TAN) 16: Sport, Recreation and Open Space, comprising outdoor sports provision (1.6 ha) and children's and informal play space.

As part of the RLDP process, it has been necessary to review whether these standards remain appropriate in light of current planning policy. Planning Policy Wales refers to the FIT standards as a source of information on providing open space and sport and recreation through the planning system.

The FIT standards were updated in 2024. The outdoor sports provision requirement remains at 1.6 ha per 1,000 population. The combined provision for equipped and informal play has decreased from 0.8 ha to 0.55 ha per 1,000 population. However, there is now an additional requirement for parks and gardens, amenity greenspace, and natural and semi-natural greenspace. Collectively, these requirements total 5.35 ha per 1,000 population, which is more than double the current standard.

Local planning authorities have the ability to set their own standards, and it was considered that an increase of the scale identified in the FIT standards would adversely affect the net developable area of sites, with implications for housing delivery and viability. The Council has therefore sought to set a target that is reasonable in the context of these standards. As explained in BP31, the standards in Policy CI1 incorporate the revised play space figure of 0.55 ha per 1,000 population. In addition, a figure of 2.2 ha of open space per 1,000 population is included, which is intended to encompass community growing spaces, outdoor sports, and informal open space provision.

The 2.2 ha of additional open space per 1,000 population is derived from the FIT standards, specifically 0.6 ha of amenity greenspace per 1,000 population and 1.6 ha of outdoor sports provision per 1,000 population.

A single additional open space target has been applied rather than separating this into formal and informal provision, as the type of provision will depend on local context and evidence. As stated in the supporting text to the policy, this approach will be design-led rather than standards-led. Feedback from stakeholders as part of the Health Impact Assessment process also emphasised that open spaces should be designed for everyone, rather than segregated into specific typologies. A combined figure was therefore preferred to better reflect the multifunctionality of open spaces.

The combined open space requirement is now 2.75 ha per 1,000 population, which is higher than the 2.4 ha per 1,000 population standard in the adopted LDP. The RLDP policy translates this into a requirement of 62.2 m² per dwelling, based on an average household size of 2.26 persons (2021 Census). By comparison, the adopted LDP uses a higher occupancy rate of 2.32 persons per dwelling (2011 Census), resulting in a requirement of 55.7 m² per dwelling. This indicates that the updated requirement is only marginally higher than that in the adopted LDP.

6920 - Barratt Redrow Homes (Boyer [Planning) - Object

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

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

Council response

The comments are noted. However, the Council considers that there is merit in preparing an open space strategy to demonstrate how the requirements of Policy CI1 will be achieved. This is information that is necessary to support the determination of an application.

The absence of an explicit requirement in Planning Policy Wales (PPW) for a standalone strategy does not render such a requirement unjustified.

The Council recognises that the level of detail required within an open space strategy should be proportionate to the scale of development. Accordingly, smaller housing developments of fewer than 10 dwellings would not be required to provide an open space strategy.

7111 - Barratt Redrow Homes (Turley) - Object

The wording and supporting text must allow greater flexibility to be applied to the open space standards. It is also important that the type and range of provision is reflective of local context/needs. This is reflected in para 6.233 but the policy should also be amended to reflect this directly.

We would question the need for a standalone 'Open Space Strategy' or statement and the policy should be amended to reflect this.

Suggested Change

Amend wording.

Council response

The comments are noted. However, the Council considers that there is merit in preparing an open space strategy to demonstrate how the requirements of Policy CI1 will be achieved. This is information that is necessary to support the determination of an application.

The absence of an explicit requirement in Planning Policy Wales (PPW) for a standalone strategy does not render such a requirement unjustified.

The Council recognises that the level of detail required within an open space strategy should be proportionate to the scale of development. Accordingly, smaller housing developments of fewer than 10 dwellings would not be required to provide an open space strategy.

6787 - Persimmon Homes (Boyer) - Object

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

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

Council response

The comments are noted. However, the Council considers that there is merit in preparing an open space strategy to demonstrate how the requirements of Policy CI1 will be achieved. This is information that is necessary to support the determination of an application.

The absence of an explicit requirement in Planning Policy Wales (PPW) for a standalone strategy does not render such a requirement unjustified.

The Council recognises that the level of detail required within an open space strategy should be proportionate to the scale of development. Accordingly, smaller housing developments of fewer than 10 dwellings would not be required to provide an open space strategy.

5950 - HBF - Object

The requirement for an 'open space strategy' for all housing development is considered onerous and unnecessary. What guidance exists on what this document should contain, and how would it differ from the submission of a landscape scheme/planning statement/design and access statement, as part of the planning application?

If the requirement is retained, it should be set at a threshold of sites larger than 100 units so as not to cause additional work for SME developers.

Suggested Change

Amend the text accordingly.

Council response

The comments are noted. However, the Council considers that there is merit in preparing an open space strategy to demonstrate how the requirements of Policy CI1 will be achieved. This is information that is necessary to support the determination of an application.

The absence of an explicit requirement in Planning Policy Wales (PPW) for a standalone strategy does not render such a requirement unjustified.

The Council recognises that the level of detail required within an open space strategy should be proportionate to the scale of development. Accordingly, smaller housing developments of fewer than 10 dwellings would not be required to provide an open space strategy.

5862 – Smith - Object

Any new development needs additional Allotment space provided and / or remove the coast and countryside parking charges for vale residents

Suggested Change

Any new development needs additional Allotment space provided and / or remove the coast and countryside parking charges for vale residents

Council response

Policy CI1 requires all new residential developments with a net gain of 10 or more dwellings to provide a minimum standard of 2.2ha of additional open space per 1000 population further to play space. This may include an element of community growing space, alongside outdoor sport and informal open space. This requirement is therefore already embedded in the policy standards. These are included as one standard rather than as separate standards for each type of open space as it may not be practical for certain developments to implement a set amount of every type of open space on site particularly at the smaller scale.

The request for the removal of parking charges at coast and countryside facilities in the Vale of Glamorgan falls outside the scope of the RLDP and cannot be addressed through land use policies.

6039 - Barratt Redrow Homes (Lichfields) - Object

The proposed 62.2 m^2 per dwelling requirement is overly prescriptive and not aligned with Field in Trust's (FiT's) methodology. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.

Policy CI1 also requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, it is appropriate for the provision of open space within a scheme to be addressed through a Design and Access Statement and / or Green Infrastructure Statement

Suggested Change

A standalone Open Space Strategy is therefore not necessary and Policy CI1 should be amended to reflect this. This amendment is necessary to ensure that Policy CI1 meets the second test of soundness (Is the Plan appropriate?)

Council Response

The comments are noted. However, the Council considers that there is merit in preparing an open space strategy to demonstrate how the requirements of Policy CI1 will be achieved. This is information that is necessary to support the determination of an application.

The absence of an explicit requirement in Planning Policy Wales (PPW) for a standalone strategy does not render such a requirement unjustified.

The Council recognises that the level of detail required within an open space strategy should be proportionate to the scale of development. Accordingly, smaller housing developments of fewer than 10 dwellings would not be required to provide an open space strategy.

Policy MD3 of the adopted LDP (2017) sets out a requirement for 1.6 ha of open space per 1,000 population, 0.25 ha of children's play space per 1,000 population, and 0.55 ha of informal play space per 1,000 population. This totals 2.4 ha of open space per 1,000 population. This is based on evidence from the 2013 Open Space Background Paper. The requirements in MD3 reflect the benchmark Fields in Trust (FIT) standards referenced in Technical Advice Note (TAN) 16: Sport, Recreation and Open Space, comprising outdoor sports provision (1.6 ha) and children's and informal play space.

As part of the RLDP process, it has been necessary to review whether these standards remain appropriate in light of current planning policy. Planning Policy Wales refers to the FIT standards as a source of information on providing open space and sport and recreation through the planning system.

The FIT standards were updated in 2024. The outdoor sports provision requirement remains at 1.6 ha per 1,000 population. The combined provision for equipped and informal play has decreased from 0.8 ha to 0.55 ha per 1,000 population. However, there is now an additional requirement for parks and gardens, amenity greenspace, and natural and semi-natural greenspace. Collectively, these requirements total 5.35 ha per 1,000 population, which is more than double the current standard.

Local planning authorities have the ability to set their own standards, and it was considered that an increase of the scale identified in the FIT standards would adversely affect the net developable area of sites, with implications for housing delivery and viability. The Council has therefore sought to set a target that is reasonable in the context of these standards. As explained in BP31, the standards in Policy CI1 incorporate the revised play space figure of 0.55 ha per 1,000 population. In addition, a figure of 2.2 ha of open space per 1,000 population is included, which is intended to encompass community growing spaces, outdoor sports, and informal open space provision.

The 2.2 ha of additional open space per 1,000 population is derived from the FIT standards, specifically 0.6 ha of amenity greenspace per 1,000 population and 1.6 ha of outdoor sports provision per 1,000 population.

A single additional open space target has been applied rather than separating this into formal and informal provision, as the type of provision will depend on local context and evidence. As stated in the supporting text to the policy, this approach will be design-led rather than standards-led. Feedback from stakeholders as part of the Health Impact Assessment process also emphasised that open spaces should be designed for everyone,

rather than segregated into specific typologies. A combined figure was therefore preferred to better reflect the multifunctionality of open spaces.

The combined open space requirement is now 2.75 ha per 1,000 population, which is higher than the 2.4 ha per 1,000 population standard in the adopted LDP. The RLDP policy translates this into a requirement of 62.2 m² per dwelling, based on an average household size of 2.26 persons (2021 Census). By comparison, the adopted LDP uses a higher occupancy rate of 2.32 persons per dwelling (2011 Census), resulting in a requirement of 55.7 m² per dwelling. This indicates that the updated requirement is only marginally higher than that in the adopted LDP.

7079 - Barratt Redrow Homes (Highlight Planning) - Object

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.

Council Response

The comments are noted. However, the Council considers that there is merit in preparing an open space strategy to demonstrate how the requirements of Policy CI1 will be achieved. This is information that is necessary to support the determination of an application.

The absence of an explicit requirement in Planning Policy Wales (PPW) for a standalone strategy does not render such a requirement unjustified.

The Council recognises that the level of detail required within an open space strategy should be proportionate to the scale of development. Accordingly, smaller housing developments of fewer than 10 dwellings would not be required to provide an open space strategy.

Policy MD3 of the adopted LDP (2017) sets out a requirement for 1.6 ha of open space per 1,000 population, 0.25 ha of children's play space per 1,000 population, and 0.55 ha of informal play space per 1,000 population. This totals 2.4 ha of open space per 1,000 population. This is based on evidence from the 2013 Open Space Background Paper. The

requirements in MD3 reflect the benchmark Fields in Trust (FIT) standards referenced in Technical Advice Note (TAN) 16: Sport, Recreation and Open Space, comprising outdoor sports provision (1.6 ha) and children's and informal play space.

As part of the RLDP process, it has been necessary to review whether these standards remain appropriate in light of current planning policy. Planning Policy Wales refers to the FIT standards as a source of information on providing open space and sport and recreation through the planning system.

The FIT standards were updated in 2024. The outdoor sports provision requirement remains at 1.6 ha per 1,000 population. The combined provision for equipped and informal play has decreased from 0.8 ha to 0.55 ha per 1,000 population. However, there is now an additional requirement for parks and gardens, amenity greenspace, and natural and semi-natural greenspace. Collectively, these requirements total 5.35 ha per 1,000 population, which is more than double the current standard.

Local planning authorities have the ability to set their own standards, and it was considered that an increase of the scale identified in the FIT standards would adversely affect the net developable area of sites, with implications for housing delivery and viability. The Council has therefore sought to set a target that is reasonable in the context of these standards. As explained in BP31, the standards in Policy CI1 incorporate the revised play space figure of 0.55 ha per 1,000 population. In addition, a figure of 2.2 ha of open space per 1,000 population is included, which is intended to encompass community growing spaces, outdoor sports, and informal open space provision.

The 2.2 ha of additional open space per 1,000 population is derived from the FIT standards, specifically 0.6 ha of amenity greenspace per 1,000 population and 1.6 ha of outdoor sports provision per 1,000 population.

A single additional open space target has been applied rather than separating this into formal and informal provision, as the type of provision will depend on local context and evidence. As stated in the supporting text to the policy, this approach will be design-led rather than standards-led. Feedback from stakeholders as part of the Health Impact Assessment process also emphasised that open spaces should be designed for everyone, rather than segregated into specific typologies. A combined figure was therefore preferred to better reflect the multifunctionality of open spaces.

The combined open space requirement is now 2.75 ha per 1,000 population, which is higher than the 2.4 ha per 1,000 population standard in the adopted LDP. The RLDP policy translates this into a requirement of 62.2 m² per dwelling, based on an average household size of 2.26 persons (2021 Census). By comparison, the adopted LDP uses a higher occupancy rate of 2.32 persons per dwelling (2011 Census), resulting in a requirement of 55.7 m² per dwelling. This indicates that the updated requirement is only marginally higher than that in the adopted LDP.

7112 - Barratt Redrow Homes (Turley) – Object

The proposed 62.2sqm per dwelling requirement is overly prescriptive and not aligned with FiT's methodology. When combined with the wider cumulative policy requirements of the

RLDP, such an approach has the potential to impact development viability and reduce delivery.

Council Response

Policy MD3 of the adopted LDP (2017) sets out a requirement for 1.6 ha of open space per 1,000 population, 0.25 ha of children's play space per 1,000 population, and 0.55 ha of informal play space per 1,000 population. This totals 2.4 ha of open space per 1,000 population. This is based on evidence from the 2013 Open Space Background Paper. The requirements in MD3 reflect the benchmark Fields in Trust (FIT) standards referenced in Technical Advice Note (TAN) 16: Sport, Recreation and Open Space, comprising outdoor sports provision (1.6 ha) and children's and informal play space.

As part of the RLDP process, it has been necessary to review whether these standards remain appropriate in light of current planning policy. Planning Policy Wales refers to the FIT standards as a source of information on providing open space and sport and recreation through the planning system.

The FIT standards were updated in 2024. The outdoor sports provision requirement remains at 1.6 ha per 1,000 population. The combined provision for equipped and informal play has decreased from 0.8 ha to 0.55 ha per 1,000 population. However, there is now an additional requirement for parks and gardens, amenity greenspace, and natural and semi-natural greenspace. Collectively, these requirements total 5.35 ha per 1,000 population, which is more than double the current standard.

Local planning authorities have the ability to set their own standards, and it was considered that an increase of the scale identified in the FIT standards would adversely affect the net developable area of sites, with implications for housing delivery and viability. The Council has therefore sought to set a target that is reasonable in the context of these standards. As explained in BP31, the standards in Policy CI1 incorporate the revised play space figure of 0.55 ha per 1,000 population. In addition, a figure of 2.2 ha of open space per 1,000 population is included, which is intended to encompass community growing spaces, outdoor sports, and informal open space provision.

The 2.2 ha of additional open space per 1,000 population is derived from the FIT standards, specifically 0.6 ha of amenity greenspace per 1,000 population and 1.6 ha of outdoor sports provision per 1,000 population.

A single additional open space target has been applied rather than separating this into formal and informal provision, as the type of provision will depend on local context and evidence. As stated in the supporting text to the policy, this approach will be design-led rather than standards-led. Feedback from stakeholders as part of the Health Impact Assessment process also emphasised that open spaces should be designed for everyone, rather than segregated into specific typologies. A combined figure was therefore preferred to better reflect the multifunctionality of open spaces.

The combined open space requirement is now 2.75 ha per 1,000 population, which is higher than the 2.4 ha per 1,000 population standard in the adopted LDP. The RLDP policy translates this into a requirement of 62.2 m² per dwelling, based on an average household

size of 2.26 persons (2021 Census). By comparison, the adopted LDP uses a higher occupancy rate of 2.32 persons per dwelling (2011 Census), resulting in a requirement of 55.7 m² per dwelling. This indicates that the updated requirement is only marginally higher than that in the adopted LDP.

CI2 – PROTECTION OF EXISTING OPEN SPACE

Three duly made representations were received on Policy CI2 (2 comments, 1 objection). One comment indicated that the evidence base in respect of sport and recreation could be strengthened. It was also suggested that the policy be strengthened to reference food growing and that the policy did not go far enough and that protection should be strengthened.

STATUTORY CONSULTEE RESPONSES

6729 - Cardiff and Vale University Health Board - Comment

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present there does not appear to be a full Open Space assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Council Response

The Open Space Background Paper (BP31) provides an audit of existing open space provision in the Vale, as well as forming the baseline for Vale-specific standards. The Background Paper also considers playing pitch provision as part of this assessment.

The Council has been liaising with the Health Board on the Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities Audit Report and welcomes its completion, as it is agreed that this will form an important part of the wider evidence base, particularly in relation to indoor sports facilities.

INDIVIDUAL RESPONSES

COMMENTS/OBJECTIONS

5403 – Taylor - Comment

Social Farms & Gardens support the policy principles but note some contemporary considerations are missing. Proposals for development on open space within settlements are only permitted if the remaining open space is adequate for local needs and the site lacks significant recreational, social, food growing, visual, or green infrastructure value. Open spaces are vital for community character, recreation, social cohesion, and well-being.

Policy CI2 applies to all open spaces within settlement boundaries, covering various typologies including parks, allotments, sports facilities, and informal greenspaces, especially where there is an open space deficit.

Council Response

The support for the policy is noted. The policy protects areas that are of significant value as green infrastructure assets. The Vale's GI strategy is clear that food growing spaces are encompassed within the definition of green infrastructure asset so it is not considered that there is a need for a separate reference to food growing spaces within the policy.

5678 - Entwistle - Object

The points do not offer enough protection of existing open space and do not actively discourage them being used for development enough. Stronger protections are required for our existing open space within the Vale.

Council Response

The policy is not meant as a blanket protection of all areas of open space, as it is recognised that there are poor quality or under-utilised areas of open space where redevelopment would represent a more efficient use of land. Instead, the policy seeks to only allow the redevelopment of open space where sufficient open space will still remain in the area and where the open space is not of a significant value. This level of protection is considered appropriate, having regard to other policy requirements, including making efficient use of land.

CI3 NEW COMMUNITY FACILITIES

CI3.1 LAND AT CLARE GARDENS, COWBRIDGE

One representation was received from a statutory consultee.

STATUTORY CONSULTEE RESPONSE

6994 - Dwr Cymru Welsh Water

Dwr Cymru Welsh Water has made representations on planning application ref 2025/01008/RG3.

Council response

The comments made on the planning application are noted. The site now has planning permission and is under construction.

CI3.2 ST ATHAN PRIMARY SCHOOL, ST ATHAN

One representation was received from a statutory consultee, together with three individual responses. The individual responses queried the timeline for development and sought clarification on what land is allocated.

STATUTORY CONSULTEE RESPONSE

6994 - Dwr Cymru Welsh Water

Dwr Cymru Welsh Water has made representations on planning application ref 2025/00991/RG3.

Council response

The comments made on the planning application are noted. This relates to a planning application for the reconstruction of an existing fire damaged classroom block with a larger footprint, rather than the redevelopment proposed as part of this allocation. Dwr Cymru Welsh Water will be a consultee on any future planning application.

INDIVIDUAL RESPONSES

6637 - Street – Comment

The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions.

Council response

The replacement and expansion of St Athan Primary is included within the Sustainable Communities for Learning Rolling Programme and is anticipated to come forward within 4-6 years. A housing trajectory has been prepared for all housing allocations to help inform all stakeholders on the likely timescales for delivery, and all parties will continue to work closely to ensure that the delivery of increased capacity is in line with the trajectory. Key trigger points linked to development progress will be identified as part of any future Section 106 agreements to ensure Education payments are made in a timely manner.

The proposed redevelopment and expansion of St Athan Primary School will be subject to future Cabinet approval, together with the successful securing of funding from the Welsh Government.

7114 - Barratt Redrow Homes (Turley)

As worded, the Policy is not clear what land is allocated. Whilst the principle of transferring land for expansion of the school (as part of Church Farm phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

Council response

The supporting text for Policy CI3 references that a small area of land may be required from the key site allocation to facilitate the school extension. This is reiterated in the policy text for HG1 KS4 and the proposed area for potential school expansion is shown on the indicative plan for HG1 KS4 (Figure 16). It is therefore considered that the plan is sufficiently clear on what the land requirements would be.

7212 - Plimmer - Comment

The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions.

Council response

The replacement and expansion of St Athan Primary is included within the Sustainable Communities for Learning Rolling Programme and is anticipated to come forward within 4-6 years. A housing trajectory has been prepared for all housing allocations to help inform all stakeholders on the likely timescales for delivery, and all parties will continue to work closely to ensure that the delivery of increased capacity is in line with the trajectory. Key trigger points linked to development progress will be identified as part of any future Section 106 agreements to ensure Education payments are made in a timely manner.

The proposed redevelopment and expansion of St Athan Primary School will be subject to future Cabinet approval, together with the successful securing of funding from the Welsh Government.

C13.3 ST RICHARD GWYN CATHOLIC SCHOOL, BARRY

One representation was received from a statutory consultee**.**

STATUTORY CONSULTEE RESPONSE

6996 - Dwr Cymru Welsh Water

Dwr Cymru Welsh Water has made representations on planning application ref 2023/00285/RG3.

Council response

The comments made on the planning application are noted. The site now has planning permission and is under construction.

CI3.4 LOWER COSMESTON FARM, PENARTH

One representation was received from a statutory consultee.

STATUTORY CONSULTEE RESPONSE

6997 - Dwr Cymru Welsh Water

Dwr Cymru Welsh Water has made representations on planning application ref 2022/01113/RG3.

Council response

The comments made on the planning application are noted. The site now has planning permission and is under construction.

CI3.5 UPPER COSMESTON FARM, PENARTH

One representation was received from a statutory consultee.

STATUTORY CONSULTEE RESPONSE

6998 - Dwr Cymru Welsh Water

Dwr Cymru Welsh Water has made representations on planning application ref 2020/01170/OUT

Council response

The comments made on the planning application are noted. The site now has planning permission subject to the signing of a Section 106 agreement.

CI3.6 LAND SOUTH OF THE RAILWAY, ST ATHAN

One representation was received from a statutory consultee, and four representations were received by individuals, two of which were from the same respondent. The individual responses raised concerns about the impact on Glamorgan Heritage Coast and the access. The site promoter of site HG1 KS5 also sought to ensure that they would not need to make disproportionate contributions to the delivery of the community facility.

STATUTORY CONSULTEE RESPONSE

6999 - Dwr Cymru Welsh Water

Water Supply - No watermains crossing the site.

Sewerage - No sewers crossing the site.

Wastewater Treatment Works (WwTW) - Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030.

Council response

The comments are noted.

INDIVIDUAL RESPONSES

4951 - Render - Object

The scale of housing development proposed for St Athan is excessive and spoils the nature of the heritage coast. Use of this site would breach the policy on the coast set out in the plan.

Council response

The site is safeguarded for community facilities, rather than housing. The site is outside of the Glamorgan Heritage Coast designation, the boundary of which is the A4265.

6124 - Barnaby - Object

This plot is on a bad bend of the B4265 - safe access to site would be dangerous - and yet another allocation to many in this area. Full consideration to the over development of St Athan should be a separate discussion point! Together with the wider impacts to infrastructure as the B4265 is a major route to Barry, Cardiff and beyond.

Council response

The supporting text for the policy highlights that there will be a need for active travel improvements, including a pedestrian and cyclist footbridge over the railway line into the site. There is support for this in principle from the site promoter of land to the north.

The potential for an access into the site from the B4265 has been considered by the Council's highways department where it was concluded that this would be feasible subject to the site access delivering necessary visibility splays, the main entrance gates are appropriately set back and adequate parking and drop off points are provided, as well as the required active travel measures.

6136 - Barnaby - Comment

I agree with planners assessment - the location of this site on the B4265 would cause significant infrastructure safety issues.

Council response

The supporting text for the policy highlights that there will be a need for active travel improvements, including a pedestrian and cyclist footbridge over the railway line into the site. There is support for this in principle from the site promoter of land to the north.

The potential for an access into the site from the B4265 has been considered by the Council's highways department where it was concluded that this would be feasible subject to the site access delivering necessary visibility splays, the main entrance gates are appropriately set back and adequate parking and drop off points are provided, as well as the required active travel measures.

6747 - Hallam Land Management - Comment

Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Council response

The Infrastructure Delivery Plan (IDP) set out in Appendix 2 of the RLDP is clear that the Education contribution required for this site is for English Medium provision. The IDP references the safeguarding of land within the site boundary to allow for the provision of a pedestrian and cycle bridge, which the site promoters are in agreement with in principle. In terms of other sustainable transport contributions, reference is made to the provision of pedestrian and cycle links on Llantwit Road, as well as an active travel route along the B4265 between the site entrance and Gileston Road. Both routes are referenced in the supporting information made available by the site promoter and are necessary to facilitate the development. With regards to wider links, the IDP references that there would need to for a contribution towards an active travel route between St Athan and Llantwit Major. It is not expected that the development would fund the whole route and any contributions would need to be proportionate.

CI4 PROTECTING AND ENHANCING EXISTING COMMUNITY FACILITIES

Two representations were received on Policy CI4, both from statutory consultees.

STATUTORY CONSULTEE RESPONSE

6680 - South Wales Police - Secured by Design Officer

When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the saftey of pupils. Achieving Secured By Design acrediation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD. South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.

Council response

South Wales Police will be consulted on all applications where there is the potential for crime and disorder or impacts on community safety. New schools are listed as one of the application types where consultation will be carried out.

6730 - Cardiff and Vale University Health Board

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food related community facilities such as kitchens, food hubs or education centres.

There is no reference to the expectation that local communities are consulted in relation to the development of community facilities.

Suggested change

Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”

We would like to see a requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

Council response

The supporting text for the policy gives examples of the community services and facilities that the policy would apply to but also states that community services and facilities are not limited to this list. It is not intended that the policy is so explicit as to list every possible

community use, and certainly the suggested uses given would be acceptable within the broad umbrella of community uses identified.

With regards to community engagement, the supporting text states that the Council will work positivity with local communities and voluntary organisations to support proposals that retain, improve or re-use social and community infrastructure. For major developments, the pre-application consultation process allows for community views to be expressed earlier in the planning process, and, as indicated by the respondent, the HIA process will also have an important role to play.

CI5 CEMETERIES

One representation was received from a statutory consultee.

STATUTORY CONSULTEE RESPONSE

7000 - Dwr Cymru Welsh Water

Water Supply - A 3” diameter watermain crosses the site.

Wastewater - There are no public sewers close to this site.

Wastewater Treatment Works (WwTW) - N/a

Council response

The comments are noted.

ANNEX 7 - PRODUCTIVE AND ENTERPRISING PLACES

This section addresses the representations made on the Employment, Climate Change, Minerals and Waste Policies in the Plan:

- The overarching SP14, which sets out the amount of employment land and jobs proposed.
- Major and Local Employment allocations (SP14.1 to SP14.8),
- EMP1 Employment Regeneration Opportunity Areas (EMP1.1, EMP1.2)
- EMP2 MOD St Athan
- EMP3 Protection of Existing Employment Sites and Premises (EMP3.1-EMP3.20)
- EMP4 Non-Employment Proposals on Existing Employment Areas
- EMP5 New Employment Proposals Within Settlements
- EMP6 New Rural Diversification and Employment Uses in the Countryside
- SP15 Sustainable Tourism
- SP16 Climate Change Mitigation and Adaptation
- CC1 Residential Operational Net Zero Carbon Development
- CC2 Presumption Against Demolition
- CC3 Renewable Energy Local Search Areas
- CC4 Renewable, Low and Zero Carbon Energy Generation
- CC5 Promoting Heat Networks
- CC6 Coastal Defences and Shoreline Management
- SP17 Sustainable Waste Management
- WA1 Assessment of Waste Management Proposals
- SP18 Sustainable Provision of Minerals
- MIN1 Development in Minerals Safeguarding Areas
- MIN2 Quarry Buffer Zones
- MIN3 Dormant Mineral Sites
- MIN4 Sustainable Mineral Working

SP14 - EMPLOYMENT GROWTH

A total of 5 representations (5 comments) were received in respect of the overarching Policy SP14 on Employment Growth. These related to the consideration of the job growth and employment land need expressed within the Deposit RLDP; promotion of food networks in the authority, and ensuring early engagement with Welsh Water in the identification of infrastructure requirements to support future employment growth.

Site specific responses for allocations SP14.1 to SP14.8 are dealt with separately.

STATUTORY CONSULTEE RESPONSES

5121 - Welsh Government (Planning Division) - Comment

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.

Council Response

The Council welcomes the Welsh Government's comments in respect of the RLDP consideration of employment growth of the plan period.

5127- Welsh Government (Planning Division) - Comment

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).

Council response

The Council welcomes the confirmation that Welsh Government do not object to the over-provision of employment land in the plan.

With regards to the Cardiff Airport and St Athan Enterprise Zone, reference is made in the supporting text to SP14 to the inclusion of allocations SP14 1-3 with the Enterprise Zone.

However, it is recognised that the full extent of the Enterprise Zone is not delineated on the proposals map. This should be amended

Proposed change

Include the extent of the Enterprise Zone on the Proposals Map.

5470 - Mr David Entwistle - Comment

The strategic transport routes showing access between enterprise zones and culver house cross/M4 are currently inadequate to cope with increased HGV and business vehicle movements. Improvements on the 5-mile lane are a good start but similar work needs to be carried out on other routes. In order to attract high quality business to the area new roading needs to be built allowing high speed access to the M4. HGV's driving along narrow rural 30/40/50mph roads is not acceptable where the Vale is competing against enterprise zones in the other areas of the country with better roading.

Council Response

The comments are noted. In respect of highways improvements, where additional infrastructure is required as a result of new development, this is identified within the site-specific policies of the plan and further detailed is contained within the Infrastructure Delivery Plan accompanying the Deposit RLDP (Background Paper 44A). This includes requirements for contributions towards sustainable transport improvements and active travel, as well as enhancements to the strategic highway network.

6731 - Cardiff and Vale University Health Board – Comment

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales' push for local supply resilience, this is a major opportunity gap.

Suggested change

Consider including the following wording: "Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains." This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

Council Response

The comments are noted. Policy SP14 sets out the spatial employment land provision for the Vale of Glamorgan over the plan period, identifying the strategic and local employment sites where priority will be for the provision B1, B2 and B8 employment uses, and would not exclude appropriate food distribution uses (B8). Elsewhere the RLDP provides a suite of

employment policies that have the potential to support additional food production network within the Vale, including farm diversification and rural enterprise.

On this basis the Council considers that suggested change to Policy SP14 is not required.

6968 - Dwr Cymru Welsh Water: Developer Services - Comment

We support sustainable economic development; however, the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.

Council Response

The comments are noted. As a statutory consultee, the Council shall seek the advice of Dwr Cymru Welsh Water through the planning process to enable DCWW to assess the infrastructure capacity and needs of development. This is more appropriate at planning application stage when the exact details of any employment development are known.

SP14.1 LAND EAST OF CARDIFF AIRPORT

A total of 8 representations were submitted in respect of SP14 (1) Employment Growth: Land East of Cardiff Airport, Rhoose (16.4 ha net), raising a number of issues associated with the development of the site. The key issues raised include highways concerns, the necessity of the allocation and the policy wording.

It is noted that a number of background documents for Employment Land were made available as part of the consultation and, where relevant, the Council's response to representation make reference to this evidence.

STATUTORY CONSULTEE RESPONSES

6666 – Natural Resources Wales

- 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.

Council Response

BP12A Employment Supplementary Paper includes two potential indicative masterplans for the site as part of a feasibility study to promote the site as an investment opportunity. A key aim of the Masterplan is 'creating an exemplar development for biodiversity – designing and operating the new business park in a manner that protects and enhances the landscape and encourages biodiversity in the spirit of the Council's Local Biodiversity Action Plan.'

The layout has sought to retain key features including hedgerows as well as provide green corridors. However, it is recognised that there will be a need for full ecological surveys to support any future planning applications and that the masterplan will need to incorporate biodiversity enhancement.

It is recognised that the site is in relatively close proximity to areas of Barry Woodlands SSSI. However, the woodlands in this area are not easily accessible, with the A4226 and agricultural fields providing a clear separation. It is not anticipated that the SSSI would be impacted by increased recreational pressure as a result of the development.

For completeness, NRW's comments will be included in Appendix 2 of the RLDP as a key site constraint.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- 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.
- Land Contamination – A Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

7003 – Dwr Cymru Welsh Water

- Water Supply - 100mm, 160mm & 300mm diameter watermains crossing the site.
- Sewerage - 150mm sewer, 225mm surface water sewer & 250mm diameter pressurised rising main crossing the site. Tredogan Sewage Pumping Station is located within the site, and we would recommend that the LPA discuss the potential allocation with their Environmental Health Department. To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.
- Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

Council Response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- Water Supply/Sewerage – Tredogan Sewage Pumping Station is located within the site. To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.

- Water Supply/Sewerage - The site falls within the catchment area of Cog Moors Wastewater Treatment Works (WwTW).

INDIVIDUAL REPRESENTATIONS

4690 – Amstone Developments Limited (Tetra Tech) - Support

Amstone Developments Limited (ADL) support the draft RLDP allocation of the Site within the 'Major Employment Allocation – Land East of Cardiff Airport, Roose'

4691 - Amstone Developments Limited (Tetra Tech) – Object

Amend Policy SP14 and its supporting text to confirm that the Major Employment Allocation at Land East of Cardiff Airport may accommodate a broad range of employment-generating uses, consistent with the definition of economic development in PPW and TAN 23, and not restricted solely to B1, B2 or B8 uses

Suggested Change

Amend Policy SP14 and its supporting text to confirm that the Major Employment Allocation at Land East of Cardiff Airport may accommodate a broad range of employment-generating uses, consistent with the definition of economic development in PPW and TAN 23, and not restricted solely to B1, B2 or B8 uses.

Council Response

Policy SP14 states "To support job growth and economic prosperity across the Vale of Glamorgan over the plan period and to meet the projected employment land needs of 67.8 hectares of employment land, and the delivery of up to 5,338 jobs, provision of 182 net hectares of employment land for B1 (Office and Light Industry), B2 (General Industries) and B8 (Distribution and Storage) employment uses is provided at the following major and local employment locations" before then listing Land East of Cardiff Airport as a Major Employment Allocation.

However, it is important to note that there is an asterisk before the list of Major Employment Allocations. The asterisk leads to the bottom line of the policy which states that "***Complimentary ancillary non-B uses may be permissible where these would provide supporting services for existing and future businesses and employees*".

It is considered that the policy wording at present provides the flexibility requested without need for alteration.

COMPOSITE RESPONSE

<u>COMMENTS/OBJECTIONS</u>

<u>Issue – Highways</u>

- Developments at the airport will cause more traffic congestion via Weycock Cross.

- There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.
- The current construction of the Vale College Campus will bring much additional traffic flow and delays on an already busy route that experiences significant delays at numerous times during the day. The situation will be exacerbated with the additional provision of industrial units on this site, the potential development at Model Farm and proposed housing developments in Rhoose. Noting that Cardiff Airport is considered important as an international gateway and essential to Wales' economy, the access route (already not ideal) will be severely compromised and could further jeopardise the airport's future.
- The airport has poor public transport infrastructure and lots of parking thereby encouraging more car travel.
- Road surface needs improving.

Council Response

The Council acknowledge that the proposed employment allocation at Land East of Cardiff Airport, alongside housing and employment sites located at Rhoose, Barry and St Athan, have the potential to increase traffic flows with the Vale of Glamorgan. Accordingly in preparing the Deposit Plan, the Council has sought to identify the potential impacts and identify mitigation measures that will be required by the site promoters to contribute towards addressing these issues.

In considering the traffic implications associated with Key Site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of development proposals on the strategic transport network and mitigation measures. In addition, the STA is supplemented by evidence from site specific Transports Assessments. The full assessment is set out in background evidence documents BP14 Strategic Transport Assessment – Stage 1 and BP14A Strategic Transport Assessment – Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a comprehensive review of the baseline transport conditions in the Vale of Glamorgan and examines the existing transport infrastructure and its current operational state, including the strategic highway network using various data sources.

The Stage 2 STA comprises a series of technical notes on the Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation and Cost Estimation and Funding Mechanisms.

Whilst the STA considered the impact of major housing allocations, assumptions were factored into the model in respect of jobs growth across the region.

The STA identified forecast capacity issues at Weycock Cross roundabout in the 2036 scenario with RLDP housing growth and background jobs growth traffic factored in and mitigation is proposed in the RLDP through a highways improvement scheme (TR1.6) funded by Section 106 contributions from key housing sites.

Major planning applications will be required to submit a comprehensive Transport Assessment. This will consider whether there will be an impact of the highways network as a result of new development. The TA will need to take into account other commitments, such as the college and Model Farm (if approved at appeal).

Cardiff Airport was formally consulted on the Deposit RLDP and did not raise objections to the proposals. Access to the airport will continue to be protected through the planning application process, including detailed design and Road Safety Audits.

Regarding the concern that the airport has poor public transport infrastructure and is reliant on private car use, Future Wales Policy 10 explicitly designates Cardiff Airport as a Strategic Gateway for international connectivity and determines that the LDP must maximise its regional benefits. Furthermore, Future Wales Policy 12 and Policy 36 require local planning authorities to plan growth to maximise investment in the South Wales Metro. The Council is collaborating regionally through the Cardiff Capital Region (CCR) Regional Transport Plan (RTP) 2025–2030. An Aviation policy (Policy AV1) of the RTP is explicitly to:

> *"Deliver a lower carbon, accessible, integrated, and reliable transport network, for both staff and passengers to access the airport, which also facilitates sustainable access to the neighbouring Bro Tathan Business Park."*

Furthermore, in accordance with Llwybr Newydd: The Welsh Transport Strategy, all new development at this site must adhere to the sustainable transport hierarchy, prioritising active travel (walking and cycling) and public transport over private motor vehicles, thereby actively working to reduce single-occupancy car dependency. This focus on sustainable growth and reducing car dependency directly aligns with the RLDP strategy to mitigate climate change, supported by a suite of climate-focused policies including PGD1, SP10, SP13, SP16, CC1–CC4, SP19, and SP20.

Financial contributions towards improvements to public transport will be secured via Section 106 planning obligations and delivered on-site through Section 278 highway agreements. Policy TR1 Transport Proposals explicitly identifies these strategic highway improvements, including upgrades to the Weycock Cross roundabout.

The Council recognises that infrastructure must keep pace with development. Figure 2 in the Regional Transport Delivery Plan (RTDP) identifies a scheme to develop and deliver an active travel corridor connecting Barry and Cardiff Airport to enhance sustainable access. Further, it also identifies an RTDP scheme to provide bus services and better integration of services

between Cardiff Airport and key transport hubs. The Deposit RLDP Infrastructure Plan clearly maps out these phased infrastructure requirements for allocations across the Plan.

These infrastructure improvements, combined with the strategic location of the site in close proximity to Cardiff Airport connecting Wales to the world, will drive interest in attracting inward investment from knowledge-based and high-tech businesses, creating high quality employment and training opportunities, ensuring the site functions as a bespoke economic destination.

With regard to the issue raised that the road surface requires improvement, whilst this is a duty of the Council in its role as highways authority, it is not something that falls within the remit of the RLDP to deliver.

Issue – Unnecessary development

- There is already an industrial area at St Athan which is not used, had a car factory which then closed in a short period, so this is unnecessary development

Council Response

The decision to allocate this site for employment use is supported by a comprehensive evidence base, specifically the Employment Land Study (BP12) and the Supplementary Employment Paper (BP12A).

Conducted by the BE Group, the Employment Land Study (2022) evaluated the existing stock of employment land and areas to identify future development needs across the plan period within the broader context of the South East Wales region. Based on a "Historic Take-up Scenario" reflecting actual localized demand for land and premises in recent years, the study identifies a total requirement of 67.8 hectares of new employment land across the Vale of Glamorgan up to 2036. Within this framework, Land East of Cardiff Airport, Rhoose, is projected to provide up to 16.4 hectares of employment land, making a substantial contribution toward meeting the Vale's identified requirement.

The study's findings indicate that the Vale's economy remains predominantly rooted in the industrial and manufacturing sectors. Spatially, this activity is concentrated across the Rural Vale (including Llantwit Major, Cowbridge, Llandow, and smaller rural diversification initiatives) and three primary strategic market areas: Barry, Bro Tathan, and Cardiff Airport.

Cardiff Airport and Bro Tathan represent substantial opportunities for advancing aerospace, high-tech manufacturing, research and development, and innovation within the Vale of Glamorgan. Drawing upon the established skills base at Cardiff Airport, British Airways Maintenance Cardiff (BAMC), and recent progress at the Bro Tathan Enterprise Zone, their regional significance is formally acknowledged in *Future Wales: The National Plan*. This national framework designates Cardiff Airport as one of four Strategic Gateways to Wales (Policy 10 – Internal Connectivity), noting that:

> "*Cardiff Airport is an essential part of Wales's strategic transport infrastructure. It is an international gateway connecting Wales to the world and is an important driver within the Welsh economy. Cardiff Airport is located within the Cardiff Airport and Bro Tathan Enterprise Zone which offers opportunities for investment in the site and surrounding areas. The Enterprise Zone offers a wide range of development sites and business accommodation, providing opportunities for the development of bespoke facilities or investment in existing accommodation*" (Future Wales, page 82).

The Land East of Cardiff Airport is primarily under the joint ownership of the Welsh Government and the Vale of Glamorgan Council and is designated for mixed-use employment. Within this allocation, Cardiff and Vale College has already secured planning consent for a new 2.7-hectare campus to the south-east of the existing Airport Business Park. Concurrently, the Council has prepared a Masterplan to guide the development of the remaining land as a premier business park.

Ultimately, the Council's employment land hierarchy highlights four strategic locations: Bro Tathan Aerospace and Business Park, land east of Cardiff Airport Business Park, and land south of Port Road (Model Farm)—which collectively form the Cardiff and St Athan Enterprise Zones—alongside Land to the South of Junction 34 of the M4. Their status at the top of the employment hierarchy underscores their critical role as primary hubs for investment and job creation throughout the Vale.

SP14.2 LAND SOUTH OF PORT ROAD (MODEL FARM)

Representation ID	Respondent Name	Representation Type
4500	Mr Simon Parker [2821]	Object
4680	Mr Tim Griffiths [2578]	Object
5104	Mrs Anne Sloman [668]	Object
5387	Emma Reed [2653]	Object
5411	Emma Reed [2653]	Object
5434	Mrs Susan Evans [712]	Object
5667	Councillor Samantha Campbell [1002]	Object
5704	Mr David Entwistle [3264]	Comment
5844	Barry & Vale Friends of the Earth [708]	Object
5854	Barry & Vale Friends of the Earth [708]	Object
5863	Mr Jeff Smith [3399]	Object
6003	Councillor Samantha Campbell [1002]	Object
6147	Mrs Jacky Williams [3343]	Object
6667	Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]	Comment
6759	Legal and General [1270]	Support
6802	Barry & Vale Friends of the Earth [708]	Comment
6870	The Stevens Family [2390]	Object
7004	Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]	Comment

A total of 18 representations from 14 individual representors were submitted in respect of SP14.2 Employment Growth: Land South of Port Road (Model Farm), Rhoose (44.75 ha net), raising a number of issues associated with the development of the site. This comprised 1 representation of support for the allocation, 4 comments and 13 objections.

Individual statutory consultee responses from NRW and DCWW have been addressed first.

As many representors have raised the same issues, a composite response has been prepared which summarises the issues raised in the full submissions and groups these issues by category. The key issues raised are need for employment land, traffic, loss of agricultural land, viability and deliverability, sustainability, amenity, biodiversity, green wedge, flooding, the candidate site assessment process and sewerage capacity.

Background Information

As context, the site is subject to a hybrid planning application (2019/00871/OUT) comprising an outline application for the demolition of existing buildings and erection of 44.75ha Class B1/B2/B8 Business Park, car parking, landscaping, drainage infrastructure, ecological mitigation and ancillary works (all matters reserved aside from access) within Area A and a full application for change of use from agricultural land to country park (Use Class D2) within Area B.

The application was reported to planning committee on 1st March 2023 with an officer recommendation for approval subject to a Section 106 agreement and conditions. A vote took place in respect of a motion in support of Officer recommendations to approve the application which was defeated. It was subsequently agreed by the Committee that the application would be deferred, to allow further consideration of the reasons for refusal of the application.

In the interim period, the Applicants submitted an appeal to Planning and Environment Decisions Wales (PEDW), citing the reason for the Appeal (Under section F of the Appeal forms) as: 'Failure of the LPA to give its decision within the appropriate period (Usually 8 weeks) on an application for planning permission'.

The submission of the Appeal against non-determination means that any formal decision on the application has now been taken out of the Council's control, and is now within the jurisdiction of PEDW. Notwithstanding the above, at a special meeting of planning committee on 18th May 2023 it was resolved that the Authority's position was that the application should be refused on ecology, heritage and climate emergency grounds and that the Authority would defend this position at appeal. At a further meeting of planning committee on 25th May the wording of the putative reasons for refusal were discussed and it was resolved that two reasons be given – the first was that in the absence of an up to date preliminary ecological appraisal, the proposed development fails to appraise the biodiversity interests at this site. The second was that the proposed development by virtue of its layout, scale and massing would have a harmful impact on the setting of historic assets.

As part of the appeal an updated Environment Statement was submitted by the appellants. This provided updated information including on Ecology and Built Heritage This new information was discussed at a meeting of planning committee on 16th January 2025, where it was resolved that both reasons for refusal be withdrawn.

An Inquiry was held in March 2026 and the decision is now awaited from the Welsh Ministers.

STATUTORY CONSULTEE RESPONSES

6667 - Natural Resources Wales

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.

Council Response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- Land Contamination - a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

7004 - Dwr Cymru Welsh Water

Water Supply - 4" & 9" diameter watermains crossing the site.

Sewerage - 375mm diameter foul sewer, and a 100mm diameter pressurised rising main sewer crossing the site.

Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

Council Response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- Water Supply - 4" & 9" diameter watermains crossing the site.
- Sewerage - 375mm diameter foul sewer, and a 100mm diameter pressurised rising main sewer crossing the site.
- The site falls within the catchment area of Cog Moors Wastewater Treatment Works (WwTW).

SUPPORT

6759 - Legal and General (RPS)

Our client, Legal and General, fully support the proposed allocation within the Deposit Plan which is to contribute 25% of the RLDP allocated employment land provision.

The 44.75 ha business park is a key component of the St. Athan – Cardiff Airport Enterprise Zone. It aligns perfectly with Planning Policy Wales and Future Wales: The National Plan 2040, which identify this area as a nationally significant economic cluster. The site is already allocated in the current LDP and is proposed as a major employment allocation in the Replacement LDP (RLDP) through 2036.

The project will provide approximately 1.7 million sq. ft of high-quality office, industrial, and warehousing space. This will attract inward investment from knowledge-based and high-tech sectors, creating skilled jobs and training opportunities within the Cardiff Capital Region. As the landowner, Legal and General remains fully committed to delivering this site despite the ongoing appeal process.

The site is a "flagship" location, with strategic connectivity to Cardiff Airport and the Bro Tathan Enterprise Zone, intended to stimulate economic resilience. By collaborating with other users in the Enterprise Zone, this development will consolidate the Vale of Glamorgan's role as a primary driver of growth in South East Wales.

Council Response

Support is welcomed

COMPOSITE RESPONSE

COMMENTS/OBJECTIONS

Issue – Employment development at the site is not needed

- The site is not needed.
- Development of the site will lead to a 'White Elephant' industrial site.
- If the allocation was removed, then provision would still allow for nearly double the projected employment land needs.
- Serious questions are raised in terms of the employment demand and delivery for a 161,834 sqm floorspace development considering the current available space, low uptake over the last decade and availability of more attractive and better connected alternatives.
- When assessed against average annual take-up rates, the proposed floorspace would take in excess of 20 years to be absorbed by the market, even if Model Farm were the only site available. This timeframe extends well beyond the plan period, directly conflicting the requirement for effective delivery. Evidence shows that there has been very limited demand for large-scale units exceeding 5,000 sqm in the Vale of Glamorgan.

Council Response

The decision to roll forward the allocation of this site for employment use is supported by a comprehensive evidence base, specifically the Employment Land Study (BP12) and the Supplementary Employment Paper (BP12A).

The Employment Land Study (BP12), conducted by BE Group, identifies a requirement for 67.8 hectares of new employment land across the Vale of Glamorgan to meet the projected needs of the plan period up to 2036. This figure is based on a "Historic Take-up Scenario," which reflects the actual demand for land and premises seen in the region over recent years.

Land south of Port Road (Model Farm) Rhoose could provide up to 44.75 hectares of employment land, making a significant contribution to the Vale's identified employment land requirement.

The site's proximity to Cardiff Airport and Bro Tathan alongside the Cardiff and Vale College development the opportunity to develop the area into a high-quality business cluster.

The Employment Land Survey for the RLDP recommends that the site should continue to be protected as strategic employment land and therefore the site's boundary remains unchanged from the LDP 2011-2026 although, as explained above, for the purposes of the RLDP, it is being considered as part of a separate allocation.

Consideration will be given to the outcome of the appeal decision and any implications this may have. However, based on the recommendations of the ELS, it is considered appropriate to retain the site as an allocation. Should the appeal be dismissed and permission refused, the site's status in the RLDP would require reconsideration.

Issue – Traffic Congestion

- The development will exacerbate traffic congestion on the A4226, including on Port Road and at Weycock Cross.
- Traffic congestion should be factored in with all other nearby allocations and commitments affecting the Weycock Cross junction.
- Traffic will be exacerbated by the construction of the Vale College Campus, housing developments in Rhoose, and these industrial units.
- A Transport Assessment is needed for the plan as a whole, not on a piecemeal basis.
- Support the development in principle but substantial improvements to transport infrastructure are needed first.
- Improved road links and airport-rail link are needed to give people the option to use public transport and reduce the traffic volume.
- Although Cardiff Airport is considered important as an international gateway and essential to Wales' economy, the access route (already not ideal) will be severely compromised and could further jeopardise the airport's future.
- Current roads unable to support additional traffic as a result of further development, roads in/out of Rhoose are already choked.

Council Response

The Council acknowledge that the proposed employment allocation at Model Farm, alongside sites located at Rhoose, Barry and St Athan, have the potential to increase traffic flows with the Vale of Glamorgan. Accordingly in preparing the Deposit Plan, the Council has sought to identify the potential impacts and identify mitigation measures that will be required by the site promoters to contribute towards addressing these issues.

In considering the traffic implications associated with Key Site allocations, the Council has commissioned a Strategic Transport Assessment (STA) to identify the potential impacts of development proposals on the strategic transport network and mitigation measures. In addition, the STA is supplemented by evidence from site specific Transports Assessments. The full assessment is set out in background evidence documents BP14 Strategic Transport Assessment – Stage 1 and BP14A Strategic Transport Assessment – Stage 2.

The Stage 1 STA, prepared to support the RLDP Preferred Strategy, provides a comprehensive review of the baseline transport conditions in the Vale of Glamorgan and examines the existing transport infrastructure and its current operational state, including the strategic highway network using various data sources.

The Stage 2 STA comprises a series of technical notes on the Strategic Modelling of Junction Impacts, Detailed Junction Capacity Modelling, Highway Mitigation and Cost Estimation and Funding Mechanisms.

Whilst the STA considered the impact of major housing allocations, assumptions were factored into the model in respect of jobs growth across the region.

The STA identified forecast capacity issues at Weycock Cross roundabout in the 2036 scenario with RLDP housing growth and background jobs growth traffic factored in and mitigation is proposed in the RLDP through a highways improvement scheme (TR1.6) funded by Section 106 contributions from key housing sites.

The planning application was supported by a Transport Assessment (TA) and Technical Note. Both were reviewed as part of the planning application by the Council's highway department and appointed consultant and it was concluded that the TA and associated Technical Note were robust. The planning committee report concluded that it has been satisfactorily demonstrated that the existing highway network is capable of accommodating the proposed development's forecasted traffic, without resulting in an unacceptable traffic impact locally and in the within the wider highway network. This is notably reliant upon infrastructure improvement in the locality, to in order to promote travel by means other than private car. This would include the transfer of a 10m strip of land across the site frontage to facilitate the provision of an active travel route and the safeguarding of land for a rapid transport shuttle service. It is also proposed to upgrade existing bus stops.

Issue – Loss of active agricultural land

- Loss of Best and Most Versatile agricultural land (BMV).
- Loss of active agricultural land that should be maintained to ensure local food production.
- The site is currently important for the economy.

- Loss of green fields/arable land

Council Response

The Council recognises the importance of agricultural land and has prepared a background paper (BP23A Best and Most Versatile Agricultural Land) to detail how the location and quality of agricultural land has influenced how sites have been considered.

Under Planning Policy Wales (PPW), agricultural land is classified to protect the most productive areas for future food security. Land is categorised into grades, with Grades 1, 2, and 3a defined as the 'Best and Most Versatile' (BMV) agricultural land. PPW requires that BMV land should be conserved as a finite resource and only developed if there is an overriding need and no lower-grade land is available.

The site is Grade 3b/4, which is not considered to be BMV land and therefore is not required to be protected by planning policy. Proposals for alternative uses, such as the proposed 44.75 hectare strategic employment allocation, may therefore be considered.

While it is appreciated that agricultural land has economic benefits, it should be noted that the proposal would create further benefits to the economy by creating up to 44.75a of employment land. The Environmental Statement submitted with the application currently awaiting determination estimates that up to 3,200 FTE jobs could be provided, supporting wages of around £110 million per annum, and GVA output between £140-200 million per annum once fully operational. On balance it is considered that the potential job creation for the B1, B2, B8 sites outweighs the potential loss of agricultural jobs.

It is recognised that the site is greenfield. However, the principle of greenfield release is acceptable within the context of the RLDP. The principle of employment on the site has already been established through the allocation of the site in the adopted LDP.

Issue – Viability and Deliverability

- Lack of a viability assessment.
- The 2015 LDP had no viability assessment for the site.
- Its siting in CA&StAthan Enterprise Zone does not exempt it from sustainable development and viability requirements.
- Deliverability is not sufficiently demonstrated by the Council and Representors.
- It is inappropriate to allocate an employment site which has proven to be unviable through detailed independent assessment which predicted a loss of £10,405,000 before interest, or £34,508,455M if interest costs were payable at 5%.
- Supporting evidence confirms that whilst the Representors suggest they remain committed, there is a huge contradiction as they also suggest that they are taking a "long-term view" about when the scheme might come forward.
- There are a number of technical constraints which have not been addressed sufficiently via the planning application process, and these simply cannot be left to roll forward to the Local Development Plan.
- When assessed against the Tests of Soundness CE2 & CE3, Policy SP14(2) fails to adequately justify Model Farm's continued inclusion in the Deposit Plan.

Council Response

It is recognised that the Development Plans Manual (Edition 3) requires all sites to demonstrate deliverability and viability in order to be allocated in the plan. In this instance, the Council has agreed to utilise the viability assessment submitted with the live planning application and appeal at Model Farm to satisfy these requirements.

Regarding the concerns over viability, a review by Avison Young was undertaken as part of the consideration of the planning application. This acknowledges that the scheme is likely to require public sector grant support to be deliverable. However, it is noted that the site is within the Enterprise Zone and strategically important location within Wales given the proximity to Cardiff Airport and the growth aspirations around this. It is therefore not unreasonable to assume that there may be government support available to bridge any funding gap, particularly given that funding has been secured on other sites in the wider strategic area.

Regarding the issue raised that the site has technical constraints that have not been addressed at planning application stage, it should be noted that the site is currently under consideration for outline permission via an appeal for non-determination. While the application has considered a significant amount of detail, Outline applications generally focus on the principle of the proposed development rather than final engineering designs. Technical assessments that are needed to address minor constraints or specific details further will be required at Reserved Matters stage, should outline consent be granted.

The site is currently subject to an appeal for non-determination. Consideration will be given to the outcome of the appeal decision and any implications this may have for the RLDP. However, based on the recommendations of the ELS, it is considered appropriate to retain the site as an allocation at this stage. Should the appeal be dismissed and permission refused, the site's status in the RLDP would require reconsideration.

Issue – Sustainability

- The site is unsustainable.
- The site is contrary to the Wellbeing of Future Generations Act.

Council Response

The acceptability of this site in sustainability terms has already been established by virtue of its allocation in the adopted LDP as an employment site. Notwithstanding this, as part of any development there will need to be improvements to active travel and enhance accessibility to public transport and active travel. These matters have been considered as part of the planning application process and if the current planning application is approved by Welsh Ministers, improvements are proposed including through the provision of land to facilitate an active travel route.

An Integrated Sustainability Appraisal (ISA) has been prepared for the Deposit RLDP which considers how the RLDP is compliant with Future Wales, the tests of soundness, and the Well-being goals.

It is considered that this allocation of this site accords with and supports the Well-being Goals of the Well-being of Future Generations (Wales) Act 2015. To support a Prosperous Wales, the development directly supports the Cardiff Airport Enterprise Zone by facilitating job creation and economic growth. This enhancement of the Cardiff Airport Enterprise Zone also supports the goal of a Globally Responsible Wales.

Regarding the goal of a Resilient Wales, all development on the site must provide a net biodiversity benefit and ensure that natural resources are managed sustainably. Furthermore, the site's proposed allocation supports Cohesive Communities by improving regional connectivity, which significantly reduces the necessity for long-distance commuting.

The inclusion of active travel routes connecting Rhoose to the site will encourage physical activity, supporting the goal of a Healthier Wales. Additionally, the application includes proposed improvements to Porthkerry Country Park, which will offer further health and recreational benefits to the local population.

Issue – Amenity

- Development of the site would result in the loss of green space.
- The site is of importance to the local community.
- Increase in youth annoyance/antisocial behaviour.
- Adverse effect on current residents mental health due to over population of the village and loss of green areas.

Council Response

Whilst we acknowledge the concerns regarding the change in the site's green appearance, it is important to clarify that the land is currently private agricultural property with no public access or recreational designation, aside from a small stretch of Public Right of Way (PROW) along part of the eastern boundary of the site.

The proposed allocation provides an opportunity to provide a managed landscape that includes dedicated public open spaces and green corridors. The PROW would also be maintained, and the development would provide new links connecting to the PROW. Additionally, agricultural land has limited biodiversity value. The proposed allocation must deliver a net gain in biodiversity and provide the community with accessible green infrastructure that does not currently exist on the site.

Further, the introduction of employment units will benefit both the local community and help meet the Vale's economic needs by providing local job opportunities. The development will create diverse local job opportunities, reducing the need for out-commuting and supporting a more sustainable community.

As previously stated, the site is currently subject to an appeal for non-determination of an outline planning application for a B1, B2, B8 use. The red-line boundary for the application covers a much larger area of land than the parcel which is proposed for allocation. Part of the proposal involves creating an extension to Porthkerry Country Park. This area is

intended to provide a net gain in biodiversity, house ecological mitigation assets and act as a permanent green corridor for wildlife, providing new open space for the community.

As a proposed employment allocation site linked with the Cardiff Airport and Bro Tathan Enterprise Zone, the proposed site would be occupied by professional commercial operations. Such employment sites generally do not generate the conditions or types of public spaces associated with youth gathering or localised antisocial behaviour.

Issue – Biodiversity

- The site is important for wildlife.
- The development will destroy habitats and reduce biodiversity
- The route impacts sensitive ecological areas (including a SINC and Ancient Woodland), introducing legal, environmental and deliverability risks that have not been resolved at plan-making stage.
- The site scored Red (does not accord with the strategy) in regard to the direct impact on surrounding SINCs and Local Nature Reserves and is a significant factor that needs addressing to allow any rollover allocation.

Council Response

The planning application was supported by ecological work, which was updated within a revised Environment Statement submitted as part of the appeal. Biodiversity was considered in significant detail as part of original planning committee report in 2023 where it was concluded that the proposal was acceptable in respect of ecology matters.

Since this original planning committee report, Chapter 6 of Planning Policy Wales has been amended, strengthening the policy position in respect of green infrastructure, net benefit for biodiversity and the step-wise approach, the protection of Sites of Special Scientific Interest and Trees and Woodland.

The RLDP acknowledges that the site is currently subject to an appeal for non-determination of an outline planning application for a B1, B2, B8 use. It should be noted from the planning application perspective that the red-line boundary for the application covers a much larger area of land than the parcel which is proposed for allocation. The ecology survey divides the site into Area A (the business park) and Area B (ecological enhancement and recreational space), with Area B being protected from industrial development and converted into an extension for Porthkerry Country Park. This area is intended to provide a net gain in biodiversity, house ecological mitigation assets and act as a permanent green corridor for wildlife.

The biodiversity value of the site was discussed extensively at the appeal Hearing and the Council ultimately awaits the decision of the Welsh Ministers on this matter.

Regarding the "traffic light" scoring system, it is assumed that this comment refers to the Integrated Sustainability Appraisal (ISA). While the ISA does score Candidate Site 551 as "red" for biodiversity (covering criteria such as Ancient Woodland and Sites of Importance for Nature Conservation), this score does not reflect the actual allocation proposal.

It is important to note that the ISA screened the entire candidate site covering 92.8 hectares, whereas the proposed allocation for employment land is for 44.75 hectares, with the remaining land retained for use as public open space, mitigation and enhancements to Porthkerry Park. As such, the candidate site proposal includes a significant area of land where no operational development is proposed to take place, skewing the results of some of the ISA scoring for the site, including biodiversity.

Consideration will be given to the outcome of this appeal when determining the status of this site within the Deposit RLDP.

Issue – Green Wedge

- The Green Wedge must be preserved.

Council Response

The Council understands the importance of the role of the Green Wedge to prevent urban coalescence between settlements. To that end, the Council has proposed to designate land between Barry and Rhoose as a formal Green Wedge, where there is a general presumption against inappropriate development.

The proposed allocation Land South of Port Road (Model Farm) is situated outside but adjacent to the proposed green wedge 'Between Barry and Rhoose', designated by Policy DPN2 (4) of the RLDP. The site was also situated outside but adjacent to a green wedge in the Adopted LDP, designed by policy MG18 (5) of the adopted LDP.

The site's relationship with the neighbouring green wedge therefore remains unchanged from the adopted LDP, and would therefore not impact upon the preservation of the green wedge.

Issue – Flooding

- Model Farm proposed development will cause flooding in Porthkerry Park.
- The absence of a comprehensive Hydraulic Modelling Assessment is a significant evidential gap.

Council Response

Any proposal on the site is required by law to integrate green infrastructure and Sustainable Drainage Systems (SuDS). It will need to be demonstrated that a development's post-construction surface water runoff rates must match or improve upon pre-development greenfield rates. Surface water would therefore be managed on-site using SuDS features like attenuation ponds and swales to prevent any increased flood risk to Porthkerry Park.

The high-level view at RLDP preparation stage is Natural Resources Wales (NRW) flood maps indicate that the site is not located within a rivers and seas flood zone, and that there is a very low risk of surface water flooding to the site.

It should be noted that the site is currently under consideration for outline permission in an appeal for non-determination. The Council's Drainage section has considered that the proposed Sustainable Drainage Assessment (RPS July 2019) has acceptable discharge rates in principle, though further hydraulic calculations are required on final design (i.e. in a Reserved Matters following Outline consent, or a Full Permission application), demonstrating the discharge rate at the point of discharge. Further, DCWW have advised that it will be necessary to undertake HMA of the public sewerage and potable water supply networks, and have recommended an appropriate set of conditions to prevent hydraulic overlading of the public sewerage system.

Issue – Candidate Site Assessment

- The site assessment scored amber for the following: Agricultural land, mineral resource, green wedge designation, special landscape areas, contaminated land, existing physical site constraints, historic environment. Given the significant amount of Amber scores, it is clearly demonstrated that the site has a number of issues which need to be fully assessed and with no apparent solutions or updates, the validity of the proposed rollover allocation is questioned.

Council Response

The Council has reviewed the Candidate Site Assessment for this specific site and maintains that it remains an accurate summary of the site's overall performance.

It is important to clarify the function of the scoring system within the assessment framework. An 'Amber' score does not denote a fundamental flaw or insurmountable barrier to development; rather, it indicates that further detailed information, targeted assessments, or formal consultation will be required at the appropriate stage to ensure the site can be considered fully acceptable.

Consequently, the Council is satisfied that the current scoring is accurate, robust, and appropriately identifies the baseline matters to be addressed, and therefore maintains the validity of the proposed rollover allocation on the basis that the appeal.

Issue – Sewerage

- Additional pressure on already overloaded pumping stations/sewerage infrastructure
- Insufficient capacity within existing foul sewerage infrastructure to accommodate development of this scale.

Council response

The Council has consulted with all key stakeholders regarding proposed allocated sites, including Dwr Cymru Welsh Water (DCWW). At this stage, DCWW have provided high level comments and advised that the site is in the Cog Moore Wastewater Treatment Works (WwTW).

DCWW do not provide comments for employment allocations until the type of development and occupier/end-user of the site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken.

It is noted, however, that DCWW have commented on planning application 2019/00871/OUT that it is unlikely that sufficient capacity exists to accommodate this development. A number of drainage and water conditions has been included in the schedule of planning conditions as part of the appeal.

SP14.3 BRO TATHAN AEROSPACE AND BUSINESS PARK

6 Representations (3 support, 2 comments, 1 objection) were received in respect of employment allocation SP14.3 Bro Tathan Aerospace and Business Park.

The representations raise a range of issues relating to the proposed employment and associated development at Bro Tathan and wider SP14 allocations.

While there is general support for employment growth and the allocation of Bro Tathan Business Park - particularly its flexibility to accommodate both general and specialised, air-side businesses - concerns are expressed about infrastructure provision, with respondents highlighting that road and transport improvements may not keep pace with development, potentially harming attractiveness to higher-quality employers.

Natural Resources Wales identify the area as ecologically sensitive and seek strategic, site-wide biodiversity planning, alongside clearer policy references to designated sites and stronger biodiversity safeguards.

Representations have been made to remove the reference to 'Aerospace' from the site name.

STATUTORY CONSULTEE RESPONSES

5186 - Welsh Government Housing and Regeneration Directorate (Carney Sweeney) – Support

We write to support Policy SP14 'EMPLOYMENT GROWTH' and in particular to the Policy's allocation of Bro Tathan Business Park.

Council Response

Comments are noted and support is welcomed**.**

5187 - Welsh Government Housing and Regeneration Directorate (Carney Sweeney) - Comment

Given the Welsh Government's objectives for the site to cater for general employment demands (including specialised/niche employers, operators requiring air-side facilities and inward investors seeking a very large single site opportunity), we consider the policy should refer to "Bro Tathan Business Park" rather than "Bro Tathan Aerospace and Business Park

Suggested Change

Refer to "Bro Tathan Business Park" rather than "Bro Tathan Aerospace and Business Park

Council Response

The following proposals put forward is accepted, and the reference to Bro Tathan Aerospace and Business Park within Policy SP14.3 along with other references to the Bro Tathan

Aerospace and Business Park will be amended. This would accord with the changing role of the Enterprise Zone as detailed in the evidence base.

Proposed Change

Amend references to “Bro Tathan Aerospace and Business Park” to read “Bro Tathan Business Park” in Policy SP14 and the supporting text in Paragraph 6.267, as well as EMP3.3.

6668 - Natural Resources Wales (NRW)

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.

Council Response

The comments in relation to Bro Tathan are noted. It is recognised that the area has been subject to a number of applications since its designation in the adopted LDP. Where appropriate, the Council has required appropriate ecological surveys to be submitted and where mitigation has been necessary through the planning process, the Council has had regard to what has been secured on other sites to ensure the mitigation is consistent and complementary.

For completeness and consistency with other employment sites, NRW’s comments will be included in Appendix 2 of the RLDP as a key site constraint.

Proposed Change

Reference the following in Appendix 2:

The site is located within an important area for GCN and dormice. Full ecological surveys including protected species surveys will be required at planning application stage.

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.

7005- Dwr Cymru Welsh Water

- Water Supply - 90mm diameter watermain crosses the site.
- Sewerage - 150mm & 300mm diameter foul sewers, and 100mm & 125mm pressurised rising main sewers crossing the site.
- Wastewater Treatment Works (WwTW) - The site is between Llantwit Major & West Aberthaw WwTW catchments.

Council Response

The comments are noted. The requirements will be added to site infrastructure requirements in Appendix 2.

Proposed Change

Reference the following in Appendix 2:

- Water Supply - 90mm diameter watermain crosses the site.
- Sewerage - 150mm & 300mm diameter foul sewers, and 100mm & 125mm pressurised rising main sewers crossing the site.
- Wastewater Treatment Works (WwTW) - The site is between Llantwit Major & West Aberthaw WwTW catchments.

INDIVIDUAL RESPONSES

5705 – Entwistle - Support

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first, the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Council Response

Support is welcomed. In respect of existing road infrastructure development at Bro Tathan has been supported by the provision of the Northern Access Road which directly serves Bro Tathan. The RLDP safeguards land for the provision of a new transport interchange at St Athan to improve public transport connectivity to St Athan and Bro Tathan. It also identifies junction improvements at the Gileston Road crossroads in St Athan.

6353 - Adamson - Object

Proposed 1400 homes East Camp St Athan air base - site now VOG owned. Object strongly as many locals do demolition of 1) First Class condition - 400 seats purpose-built cinema 2) 400 seat purpose-built cinema Olympic size X standard pool 3) 2 sports hall X track of Olympic standard first class order. 4) 2 medical centre purpose built first condition.

Council Response

East Camp St Athan is owned by the Welsh Government and forms part of the Enterprise Zone. Any decisions to demolish existing buildings with the parameter of East Camp as part of the Bro Tathan employment allocation would be a matter for the Welsh Government and is therefore outside the scope of the RLDP.

SP14.4 LAND TO THE SOUTH OF JUNCTION 34 OF THE M4, HENSOL

A total of 5 Representations (2 support, 3 comments) were received in respect of employment allocation SP14.4 Land to the South of Junction 34 of the M4, Hensol.

Representations raising objections to Employment Allocation SP14-4 Renishaw were made in respect of raised concerns regarding the capacity of local infrastructure—particularly roads, schools, healthcare, and utilities, and that further development would worsen congestion, pollution, and safety without clear evidence of adequate upgrades.

Whilst representations in support of the allocation, also stressed the need to ensure that improvement to transport infrastructure first to avoid deterring investment. Whilst Renishaw Plc strongly support the allocation, emphasising the strategic value of the site as a well-connected, high-quality employment location, noting existing development progress and significant future job creation potential.

STATUTORY CONSULTEE RESPONSES

6669 - Natural Resources Wales (NRW)

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.

Council Response

An application was approved in December 2025 to vary condition 2 of 2014/00228/EAO (outline planning permission with all matters reserved except for access, for development comprising class B1, B2 and B8 uses; a hotel/residential training centre (class C1/C2); and ancillary uses within class A1, A2, A3; associated engineering and ground modelling works and infrastructure, car parking, drainage and access for all uses; provision of infrastructure (including energy centre(s)); landscaping and all ancillary enabling works) to extend the period of time for submission of reserved matters by a further five years from the date of the new permission at Renishaw Plc, Miskin Business Park, Miskin.

The officer's report for the planning application gives a comprehensive assessment of the ecological constraints on the site and concluded that the proposal is in line with the adopted LDP policies as well as national policy.

With regards to flood risk, the planning application was supported by a Flood Consequences Assessment. NRW were consulted on the planning application and concluded that the FCA demonstrated that the risks and consequences of flooding could be managed to an acceptable level.

In the event that the planning permission expires, the introductory section of Appendix 2 of the RLDP sets out the planning application requirements that are likely to be necessary to support an application.

7006 - Dwr Cymru Welsh Water

- Water Supply - 450mm diameter watermain crossing the site.
- Sewerage - 750mm diameter foul sewer crossing the site.
- Wastewater Treatment Works (WwTW) - The site is in Coslech WwTW catchment.

Council Response

The comments are noted. DCWW were consulted on the recently approved planning application for the site and raised no objection.

INDIVIDUAL RESPONSES

6564 - Renishaw Plc - Support

Renishaw Plc supports the retention of the Junction 34 (Hensol) allocation under Policy SP14.4, noting the rarity of well connected, high-quality industrial sites. Phase 1 of the site has outline planning permission for up to 151,060.99 sqm of industrial space, a hotel/residential training centre, ancillary uses, and extensive infrastructure, with the first phase completed providing 400,000 sqft of space occupied by Renishaw. The site remains deliverable. Future phases (Areas B, C, and D) are expected to provide over 1,000,000 sq ft of employment space, potentially creating 2,000 operational and 1,000 construction jobs, contributing significantly to regional sustainable growth.

Council Response

Comments are noted and support is welcome.

5076 - Entwistle - Support

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first, the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Council Response

Support is welcomed. In respect of existing road infrastructure development, the site is located in close proximity to the M4 and therefore offers highly accessible road connectivity. It is also noted that the site is the subject of an extant planning permission (2019/01421/RES) and matters relating to highway infrastructure and employee transport management was examined by the Council in the determination of the planning permission.

5033 - Elward - Comment

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

Council Response

Land South of Junction 34 of the M4 is an existing employment site. Additional land to the north and east, allocated in the adopted LDP and rolled forward into the RLDP, has the benefit of outline planning permission and therefore the principle of development has been established. The Council's highways department was consulted and raised no objections to the proposal.

SP14.5 ATLANTIC TRADING ESTATE, BARRY

STATUTORY CONSULTEE RESPONSE

7007 - Dwr Cymru Welsh Water – Comment

- Water Supply - No watermains crossing the site.
- Sewerage - North parcel – 375mm, 1050mm diameter foul sewers, and Combined Sewer Overflow and 825mm diameter outfall pipe crossing the site. South parcel – 150mm diameter foul sewer crossing the site.
- Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

Council Response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- Sewerage - North parcel – 375mm, 1050mm diameter foul sewers, and Combined Sewer Overflow and 825mm diameter outfall pipe crossing the site. South parcel – 150mm diameter foul sewer crossing the site.

SP14.6 WINDMILL PARK, HAYES ROAD, BARRY

A total of 2 representations were submitted in respect of Windmill Park, Hayes Road with statutory consultees submitting comments around the development of these sites. The comments and the council's response can be seen below.

STATUTORY CONSULTEE RESPONSES

6671 - Natural Resources Wales (NRW) – Comment

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.

Council Response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- 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.

7008 – Welsh Water – Comment

Water Supply - No watermains crossing the site.

Sewerage - 225mm diameter foul sewer crossing the site. Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

Council response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

Water Supply - No watermains crossing the site.

Sewerage - 225mm diameter foul sewer crossing the site. Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

SP14.7 VALE BUSINESS PARK, LLANDOW

STATUTORY CONSULTEE RESPONSES

6672 - Natural Resource Wales (NRW) – Comment

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.

Council Response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- 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.

7009 - Dwr Cymru Welsh Water: Developer Services – Comment

Water Supply - No watermains crossing the site. Sewerage - There are no public sewers close to this site. Wastewater Treatment Works (WwTW) - N/a.

Council response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

Water Supply - No watermains crossing the site.

Sewerage - There are no public sewers close to this site. Wastewater Treatment Works (WwTW) - N/a.

SP14.8 LAND AT LLANDOW TRADING ESTATE

STATUTORY CONSULTEE RESPONSES

6673 - Natural Resource Wales (NRW) – Comment

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.

Council Response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- 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.

7009 - Dwr Cymru Welsh Water : Developer Services – Comment

Water Supply - 160mm diameter watermain crossing the site. Sewerage - There are no public sewers close to this site. Wastewater Treatment Works (WwTW) - N/a.

Council response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

Water Supply - 160mm diameter watermain crossing the site

Sewerage - There are no public sewers close to this site. Wastewater Treatment Works (WwTW) - N/a.

EMP1.1 FORMER ABERTHAW POWER STATION

A total of 8 representations (2 support, 3 comments, 3 objections) were received in respect of Policy EMP1 Allocation - Former Aberthaw Power Station

Representations on Policy EMP1 Former Aberthaw Station, raised concerns in respect of infrastructure provision particularly in respect of highways capacity and transport modelling, environmental constraints, and lack of supporting detail in terms of future uses and investment.

STATUTORY CONSULTEE RESPONSES

6648 - Natural Resources Wales (NRW)

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.

Council Response

The supporting text for Policy EMP1 recognises the ecological importance of parts of the site. The site boundary reflects land within the control of the site owner, CCR Energy, allowing flexibility for any future proposals.

It is acknowledged that the boundary includes the East Aberthaw Coast SSSI/Aberthaw Nature Reserve. However, there are no proposals for built development within this area, and the supporting text for the policy makes clear that it should be safeguarded, supported, or, where possible, enhanced. The RLDP also states that an appropriate buffer should be maintained between built development and the SSSI.

Given the potential for biodiversity net benefits through the inclusion of the SSSI within the buffer, this approach is considered appropriate.

The supporting text to the policy also highlights the need for remediation, which will be informed by land contamination investigations.

7011 - Dwr Cymru Welsh Water

- Water Supply - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.
- Sewerage - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.

- Wastewater Treatment Works (WwTW) - The site is between East Aberthaw & West Aberthaw WwTW catchments.

Council Response

Comments noted. These points will be added to the Infrastructure Plan and Appendix 2 of the RLDP.

Proposed Change

Include a section in the Infrastructure Plan and Appendix 2 for Employment Allocations. Also include the following points under the key infrastructure requirements section in the Infrastructure Plan and Appendix 2 of the RLDP:

- Water Supply - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.
- Sewerage - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.
- Wastewater Treatment Works (WwTW) - The site is between East Aberthaw & West Aberthaw WwTW catchments.

INDIVIDUAL RESPONSES

6823 – National Grid Electricity Transmission (Planning Enquiries) - Object

A significant number of NGET assets – including substations – fall within Employment Opportunity Area 1.

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

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

references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

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

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

Suggested Change

We propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

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

Council Response

The proposed change is accepted. This will be included in Appendix 2.

Proposed Change

Include the following as a constraint in Appendix 2:

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

5708 - Cardiff Capital Region Energy - Support

CCR Energy strongly supports Policy EMP1 and the designation of the former Aberthaw Power Station as a Green Energy, Employment and Innovation Park. The redevelopment will create a regionally significant hub for renewable and low-carbon energy, zero-carbon manufacturing, and innovation, delivering high-quality skilled jobs, training, and education opportunities. The proposals integrate sustainable land use, biodiversity enhancements, green infrastructure, flood risk mitigation, and support the circular economy. Phased development, masterplanning, and stakeholder engagement ensure a comprehensive approach, safeguarding adjacent communities and the East Aberthaw Coast SSSI, while

maximising sustainable transport connections and contributing significantly to decarbonisation and the Vale's green economy.

Council Response

Support is noted.

5785 - Mrs Gail Kirkham – Support

Much needed. An eyesore at the moment.

Council Response

Support is noted.

5394 – Reed - Object

Lack of detail of traffic implications when combined with other committed and proposed developments in the area. A full proper impact assessment is needed as of 2025 not done in 2022 as outdated by COVID.

Suggested Change

More detail is needed on the transport implications of this large employment site. The likely traffic generation needs to be added to other developments in the area including land at Readers Way and Weycock Cross.

Council Response

Plans for the redevelopment at the former Aberthaw power station is in its earliest stages and as such the number of future jobs anticipated are yest to be determined. Given the present situation, it was considered that including Aberthaw within the strategic transport assessment would be inappropriate. However, a transport assessment would be required to support any future planning proposals, and this would be required to provide necessary mitigation measures to address any impacts on the strategic highway network alongside sustainable transport contributions.

The methodology adopted within the strategic transport assessment utilises the South East Wales Transport Model (SEWTM), which is owned by the Welsh Government and managed, maintained and updated by Transport for Wales. The model, covers the whole Cardiff Capital region area, has been designed specifically to assist local authorities to identify the cumulative impacts of development on specific junctions on the strategic highway network.

5437 - Evans

There is insufficient detail of the impact of this proposal on the local SSI and highway network which is already overburdened in the area.

Council Response

Plans for the redevelopment at the former Aberthaw power station is in its earliest stages and as such the number of future jobs anticipated are yest to be determined. Given the present situation, it was considered that including Aberthaw within the strategic transport assessment would be inappropriate. However, a transport assessment would be required to support any future planning proposals, and this would be required to provide necessary mitigation measures to address any impacts on the strategic highway network alongside sustainable transport contributions.

It is acknowledged that the boundary includes the East Aberthaw Coast SSSI/Aberthaw Nature Reserve. However, there are no proposals for built development within this area, and the supporting text for the policy makes clear that it should be safeguarded, supported, or, where possible, enhanced. The RLDP also states that an appropriate buffer should be maintained between built development and the SSSI.

6004 - Councillor Samantha Campbell

Clarification needs to be sourced on the future of this development as to key players in the future investment, and stakeholders as it is now visible currently**.**

Council Response

Plans for the redevelopment at the former Aberthaw power station is in its earliest stages and as such the number of future jobs anticipated are yet to be determined. The Capital City Region has indicated that the redevelopment will be phased linked to the demolition and reclamation of land, and detailed masterplans will be undertaken. The RLDP provides a strategic overview of the CCRs proposals for the land and the plan sets out the requirements for its future development.

EMP1.2 LAND AT THE PORT OF BARRY

A total of 5 representations (1 support, 2 comments, 2 objections) were received in respect of Policy EMP1.2 Allocation Land at the Port of Barry.

The representations raise a range of planning, environmental, infrastructure, and transport concerns regarding the proposed development at the Port of Barry site. The issues raised centre on flood risk, environmental protection, transport impacts, infrastructure capacity, and the need to align the proposal with strategic economic and sustainability objectives. Representations in support of the proposal highlight the appropriateness of the site, whilst ABP propose revised policy wording to reflect evolving masterplanning and a focus on low-carbon economic uses.

STATUTORY CONSULTEE RESPONSES

7012 - Dwr Cymru Welsh Water: Developer Services – Comment

Water Supply - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.

Sewerage - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.

Wastewater Treatment Works (WwTW) -The site is in Cog Moors WwTW catchment

Council Response

The comments are noted and will be included in an update to the Infrastructure Plan.

Proposed Change

Update the Infrastructure Plan to include the following:

Water Supply - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.

Sewerage - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.

Wastewater Treatment Works (WwTW) -The site is in Cog Moors WwTW catchment

INDIVIDUAL RESPONSES

SUPPORT

5786 - Mrs Gail Kirkham

Excellent proposal.

Council Response

Support is noted.

COMMENTS/OBJECTIONS

6234 – Associated British Ports - Comment

ABP fully supports this policy and looks forward to working constructively alongside VoGC and other key stakeholders to realise the opportunities that the Port of Barry can deliver for the town, the Vale of Glamorgan and the Wales economies. In order to reflect the current circumstances, it is proposed that paragraph 6.283 is amended to read as follows:

6.283 The plans for the Port of Barry represent the next stage in the regeneration of Barry Docks and focusses on enhancing the docks' future economic role. The identification of the area as an Employment Regeneration Opportunity Area reflects the vision and aspirations of ABP contained within its emerging long-term strategy. This will set out the employment areas and operational port land at the Port and focus on developing the port around low and zero carbon sectors alongside traditional marine related industrial uses**.**

Suggested change

That paragraph 6.283 is amended to read as follows:

6.283 The plans for the Port of Barry represent the next stage in the regeneration of Barry Docks and focusses on enhancing the docks' future economic role. The identification of the area as an Employment Regeneration Opportunity Area reflects the vision and aspirations of ABP contained within its emerging long-term strategy. This will set out the employment areas and operational port land at the Port and focus on developing the port around low and zero carbon sectors alongside traditional marine related industrial uses.

Council Response

Comments are noted. The Council will update para 6.283 as a factual change to the plan.

Proposed Change

Paragraph 6.283 will be amended as worded below:

The plans for the Port of Barry represent the next stage in the regeneration of Barry Docks and focus~~ses~~ on enhancing the docks' future economic role. The identification of the area as an Employment Regeneration Opportunity Area reflects the vision and aspirations of ABP contained within its **emerging** long-term strategy ~~Future Ports: Barry~~. This **will** set ~~sets~~ out the employment areas and operational port land at ~~No2 Dock to 2035~~ the Port and focus~~es~~ on developing the port around low and zero carbon sectors alongside traditional marine related industrial uses.

5551 - Mr Corrado Ruta - Object

I object to the proposed development of the area east of Sully Moors because it goes against the Objective 1 – Mitigating and Adapting to Climate Change as the area is in a flood plain and regularly gets flooded during/after heavy rainfalls.

It also goes against Objective 5 – Protecting and Enhancing the Natural Environment and Objective 2 - Improving Mental and Physical Health and Well-being because the area is part of Sully heritage rural setting and crossed by a public right of way for local walkers.

Council Response

Comments are noted. The site is identified as an existing employment site and the Council propose to protect the site for employment uses. Any future development would be required to assess potential flood risk.

5880 - Mrs Elizabeth Rudman - Object

Will increase congestion along port road

Council Response

Comments are noted. The site is identified as an existing employment site and the Council propose to protect the site for employment uses. Any future development that proposals that would lead to increase highway traffic would need to undertake a highway assessment as provide appropriate mitigation if deemed necessary.

EMP2 - MOD ST ATHAN

3 representations (1 support, 2 comments) were received in respect of Policy EMP2 MOD St Athan

Representations raise a range of issues primarily relating to operational safety, and safeguarding requirements. the Ministry of Defence in their representations note that development must not compromise the operational capability of the MOD technical site at St Athan and seek additional policy clarification in respect of tall structures, wind turbines, and solar installations that may interfere with aviation safety. Whilst South Wales Police emphasise the need for early and ongoing engagement with Designing Out Crime Officers and Counter Terrorism advisors to ensure that development incorporates Secured by Design principles.

Representation in support of the policy recognise the economic benefits associated with MOD St Athan and the need to balancing redevelopment and economic use of the site with defence safeguarding.

STATUTORY CONSULTEE RESPONES

6684 - South Wales Police – Secured by Design Officer

Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.

Council Response

Comments are noted. South Wales Police Design Out Crime Officer is a statutory consultee and is consulted on major planning applications.

6700 - Ministry of Defence

The MOD notes and welcomes the intentions of Policy EMP2: MOD ST ATHAN. However, it is recommended that additional wording is added to make clear that this policy relates to the safeguarded MOD technical site.

Tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.

Suggested Change

It is recommended that wording is updated as follows: “New development within or adjoining MOD St Athan and the safeguarded MOD technical site that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. Proposals for non-military or non-defence related development within or in the areas around MOD St Athan, or the

safeguarded MOD technical site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site."

Council Response

The comments are noted. The amended wording put forward is accepted.

Proposed Change

Paragraph 6.286 should be amended as follows:

~~Policy EMP2 supports development within MOD St Athan where it is required for operational purposes, as defined on the Policies Map. Similarly, proposals within or on land immediately adjacent to MOD St Athan will only be permitted where these proposals would not adversely affect or prejudice the use of the area for its operational purposes.~~

New development within or adjoining MOD St Athan and the safeguarded MOD technical site that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. Proposals for non-military or non-defence related development within or in the areas around MOD St Athan, or the safeguarded MOD technical site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.

Paragraph 6.288 should also be amended to include additional text:

Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example where proposals include a wind turbine or roof mounted solar PV system. **In addition, tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.**

INDIVIDUAL RESPONSES

Mrs Gail Kirkham - Support

MOD St Athan is the obvious place for further development in this area. So much brown field land to develop and provide much needed employment in the area. I support.

Council Response

Support is noted.

EMP3 - PROTECTION OF EXISTING EMPLOYMENT SITES AND PREMISES (POLICY WORDING AND EXCLUDED SITES)

3 representations (2 objection, 1 comment) were received in respect of Policy EMP3 Protection of Existing Employment Sites and Premises.

5191 - Welsh Government (Economy, Treasury and Constitution Group - Property Infrastructure) (Carney Sweeney)

We write to comment and seek amendments to Policy EMP3 'PROTECTION OF EXISTING EMPLOYMENT SITES AND PREMISES'.

We note that while the title of Policy EMP3 refers to 'existing employment sites and premises', it is clear from the text of the policy that it also applies to 'Major Employment Sites'. The Proposals Map identifies 'existing employment' and 'major employment' sites separately and with different boundaries, such that 'major employment' sites include land which is not an existing employment location (eg land at Bro Tathan North as well as land at Cardiff Airport).

Suggested Change

In order to avoid any confusion regarding the application of Policy EMP3, we believe it should be re-named 'PROTECTION OF ALLOCATED AND EXISTING EMPLOYMENT SITES AND PREMISES'.

Finally, given the Welsh Government's objectives for the site to cater for general employment demands (including specialised/niche employers, operators requiring air-side facilities and inward investors seeking a very large single site opportunity), we consider the policy should refer to “Bro Tathan Business Park” rather than “Bro Tathan Aerospace and Business Park”

Council Response

The comments are noted. It is recognised that the Bro Tathan boundary encompasses land that is allocated for employment as well as existing employment land. This is due to the extensive size of the site which covers both areas of existing employment and allocated land (undeveloped or suitable for redevelopment). Bro Tathan is identified as a new employment allocation under Policy SP14, with the policy identifying that the site is suitable for B1, B2 and B8 uses and complimentary ancillary non-B uses where these would provide supporting services for existing and future businesses and employees. Policy EMP3 relates to the elements of the site that are currently in B1, B2 and B8 use, protecting them for development that would compromise their role and function. As there is a clear distinction across allocated and existing employment sites, it is not considered that it is necessary to reference allocated sites under Policy EMP3.

The Council accepts the proposed change of the site name.

Proposed Change

Amend the site name of Bro Tathan in Policy EMP3 from 'Bro Tathan Aerospace Business Park' to 'Bro Tathan Business Park.'

7181 - Cadoc Castle Land Developments Ltd (Geraint John Planning) – Object

In light of the candidate site submission made by the site promoter, it is considered that the site should be considered acceptable and appropriate as an employment site allocation.

It is considered that the site should be re-allocated as an employment site, given that the previous concerns regarding deliverability have been overcome (as evidenced in the candidate site submission). As a result, it is considered that the site should be identified within the Policy EMP3.

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). This is contrary to the provisions of the Development Plans Manual. 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.

Council Response

The LDP allocation at Ffordd Y Mileniwm was reviewed as part of the evidence base for the RLDP, as detailed in BP12 Employment Land Study (ELS). The ELS references that 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.

The study notes that, at the time of its preparation, there was interest in a commercial development that would provide a new access point, enabling the remainder of the site to be opened up for B-Class uses. Whilst such access would increase the likelihood of the remainder of the site being developed for B-Class uses, it would still require a degree of external support to attract occupiers and bring the site forward for development. The report concludes that:
"*it is recommended that Land at Ffordd y Mileniwm not be allocated in the Replacement LDP, for B-Class uses, unless a clear delivery plan can be agreed between public and private partners agreeing responsibility and finance for site marketing, further infrastructure investment and development*."

Two candidate site submissions relating to the site were made as part of the second Call for Sites: one for residential development (Site 4070) and one for a mixed-use residential and commercial

development (Site 2804). These sites have been assessed, and BP18A Candidate Site Assessments at Deposit Stage sets out the conclusions of those assessments:

"*Whilst the site is a brownfield site located within the strategic growth area, it is subject to a covenant which restricts the use of the land to employment related developments. Following extensive discussion between the interested parties it was found that the covenant constraints would not enable the uses proposed by the landowner to be realised. Accordingly, it is not possible to consider the site further through the RLDP process for a mix of uses that includes housing as such a use is not considered to be deliverable*."

The latest submission seeks the re-allocation of the site for employment use, with the site promoter stating that the previous concerns regarding deliverability have now been addressed.

The site submission (6111) is supported by letters from two existing businesses that have expressed an interest in occupying the site for employment purposes. The site promoter confirms that B1, B2 and B8 uses would be permitted under the terms of the existing covenant and that the use of the site for such purposes is not constrained in this respect. The submission is also supported by a viability appraisal relating to one of the interested businesses. However, this appraisal relates only to part of the site, with viability dependent upon the majority of the site being brought forward as speculative development. The second business that expressed an interest has provided only limited information. Whilst these expressions of interest are noted, they are not considered sufficient to justify a significant change in position regarding the allocation of the site.

The representation also refers to the Employment Supplementary Paper (BP25A), which states that, whilst the site has not been allocated, it has been retained as white land within the settlement, thereby providing an opportunity for it to be redeveloped for employment purposes in the future. The representation notes that, despite this reference, the site has not been included within the settlement boundary.

It should be noted that the approach taken in the adopted LDP, and carried forward into the RLDP, is to deliberately exclude existing employment sites and new employment allocations from settlement boundaries where they are located outside defined residential areas. This is because such sites are afforded protection through the relevant employment policies. The Operational Port, Barry Docks and the adjoining Chemical Complex are all protected under Policy EMP3 but lie outside the settlement boundary. The RLDP makes clear that allocated or protected areas located outside settlement boundaries are not regarded as countryside.

The de-allocation of Ffordd y Mileniwm means that the site is neither allocated nor included within the settlement boundary. Under a strict interpretation of Policy SP3, the site would therefore be considered countryside. As a consequence, Policy EMP6 (Employment Uses in the Countryside) would apply rather than Policy EMP5 (New Employment Proposals within Settlements).

However, it is not the intention of the RLDP to prevent or unduly restrict the redevelopment of this site for appropriate employment uses. The site comprises previously developed land in a

sustainable location and there may be employment uses that would be appropriate, subject to the resolution of deliverability concerns and compliance with the covenant restrictions. It is therefore considered appropriate to extend the settlement boundary to include the site.

Notwithstanding this amendment, it remains the Council's position that the site should not be allocated for employment development.

Proposed Change

Extend the settlement boundary to include Land at Ffordd y Mileniwm.

7242 – Woodwise Ltd (Geraint John Planning) – Object

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.

Suggested Change

The Crossways Estate, Cowbridge site should be identified within the Policy EMP3.

Council response

The site was submitted as a new site at Deposit Stage. As detailed in Annex 10, the proposal relates to the redevelopment of an existing timber yard and expansion into an adjoining field for small scale industrial units. The site is in a rural location some distance from the nearest settlement (Cowbridge). The location is not considered to a sustainable location for the type of employment proposed.

EMP3 - PROTECTION OF EXISTING EMPLOYMENT SITES AND PREMISES: INDIVIDUAL SITES

The following representations were made on individual sites identified within Policy EMP3.

EMP3.1 OPERATIONAL PORT, BARRY

6236 - Associated British Ports - Support

ABP fully supports this policy and looks forward to working constructively alongside VoGC and other key stakeholders to realise the opportunities that the Port of Barry can deliver for the town, the Vale of Glamorgan and the Wales economies.

Council Response

The support is noted.

EMP3.2 THE CHEMICAL COMPLEX, BARRY

5709 – Entwistle - Object

This site is very large and I think it unrealistic to expect the whole site to be filled in the future by business usage. Some of this site could be put forward as a housing development site to avoid housing developments being built on Greenfield land.

Suggested Change

I think protecting this site purely for business use is unrealistic and not the most efficient use of brownfield sites. It is a large site and rather than potentially sitting empty for years to come should be put forward as a brownfield site for potential housing development alleviating more pressing housing problems.

Council Response

The continued protection of this site for employment uses is in line with the recommendations of the Employment Land Study (BP12). Whilst it is recognised that there are parts of the site that are under-utilised, it is not considered that this would be an appropriate locations for future housing development due to potential conflict with the adjoining industrial uses.

EMP3.3 CARDIFF AIRPORT BUSINESS PARK

5916 – Reed – Object

Development at Readers Way will likely be affected from flooding and airport noise already occurring in the Rhoose area. Development of the readers way site could curtail the development of the airport as there will be more houses to object to operations on the airport site due to noise and no control over BAMC opening their doors and testing engines. Likely increased flooding too from the airport runways.

Council Response

Comments are noted. The concerns about the proximity of the housing allocation at Readers Way to the airport have also been raised and responded to in the key site response. The Council wishes to highlight that the proposed key housing allocation at Readers Way is not in close proximity to the Airport Business Park. The housing site is located to the west of the runway, whilst the business park is located to east of the airport.

EMP3.4 BRO TATHAN AEROSPACE PARK

5258 - Llantwit Major Town Council – Support

We also note that Site ID 424 sits partially within the Llantwit Major boundary and is appropriate for employment.

Council Response

The support and comments are noted.

EMP3.6 RENISHAW, JUNCTION 34, M4

6566 - Renishaw - Support

Renishaw Plc support the continued allocation of the current Renishaw premises as an existing Major Employment Site under Policy EMP3.6 – Renishaw, Junction 34, M4. The allocation of the Renishaw site recognises the importance of the established employment site for the local economy. Renishaw continue to represent an important local employer, who provide high quality, skilled and specialist employment opportunities for the local population. The continued safeguarding of the site for B1, B2 and B8 uses is therefore supported.

Council Response

The support is noted.

EMP 3.7 ATLANTIC TRADING ESTATE, BARRY

6670 – Natural Resources Wales

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.

Council Response

The comments are noted.

For completeness and consistency with other employment sites, NRW's comments will be included in Appendix 2 of the RLDP as a key site constraint.

Proposed Change

Add the following to Appendix 2 of the RLDP:

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.

EMP4 - NON-EMPLOYMENT PROPOSALS ON EXISTING EMPLOYMENT AREAS AND PREMISES

4 representations (2 Objections, 1 comment, 1 Support) were received in respect of Policy EMP4 Non-Employment Proposals on Existing Employment Areas and Premises

The representations to Policy EMP4 raised concerns in relation to the lack of clarity, flexibility, internal consistency, arguing that the policy is too narrowly defined around traditional employment use classes (B1, B2, B8), including sui generis uses, renewable energy, and emerging sectors, seeking changes to the policy to widen the definition of "employment uses". Representations also seek clarification as to whether the policy would apply to existing employment sites only or also major employment allocations.

4692 - Tetra Tech Cardiff - Object

Clarify the definition of "non-employment proposals" so that non-B1/B2/B8 uses capable of generating employment are properly treated as "employment uses". Remove - duplicated criteria already controlled via other policies

Modification- Supporting Text

Update the supporting text to acknowledge that employment allocations within the Enterprise Zone should support a flexible mix of economic uses reflecting the national policy position in PPW, TAN 23 and Future Wales

Proposed Suggested Change

Clarify the definition of "non-employment proposals" so that non-B1/B2/B8 uses capable of generating employment are properly treated as "employment uses". Remove -duplicated criteria already controlled via other policies

Update the supporting text to acknowledge that employment allocations within the Enterprise Zone should support a flexible mix of economic uses reflecting the national policy position in PPW, TAN 23 and Future Wales.

Council Response

The Council is of the view that for existing employment sites and premises, the wording of Policy EMP4 satisfactorily distinguishes between employment and non-employment uses, with non-employment uses being those which fall outside of uses classes B1, B2 and B8 as specified within the policy. The policy does explain that whilst non-B class uses will be resisted there are limited ancillary uses that would be acceptable. Examples of appropriate ancillary uses are provided with the written justification at paragraph 6.296. This is consistent with the recommendations of the Council's Employment Land Review (Background Paper 12) which states at Paragraph 9.17 that:

“the highest policy protections be given to the six identified Major Employment Sites. Non - B Class uses should not normally be allowed in Major Employment Sites. However, it is recognised that the two parts of the Enterprise Zone, which are isolated from the Vale’s main settlements, there is a need for some ancillary services to serve the large populations which are, and will be, working from here and increase the market attractiveness of these locations. However, such uses should still be avoided where they conflict with strategic industrial and logistics operations and where substantial trade could be drawn away from the Vale’s existing retail centres.”

5192 - Welsh Government (Economy, Treasury and Constitution Group - Property Infrastructure) (Carney Sweeney) - Comment

We write to comment and seek amendments to Policy EMP4 'NON-EMPLOYMENT PROPOSALS ON EXISTING EMPLOYMENT AREAS AND PREMISES'

We note that while the title of Policy EMP4 refers to 'existing employment areas and premises', it is clear from the text of the policy that it also applies to 'Major Employment Sites'. The Proposals Map identifies 'existing employment' and 'major employment' sites separately and with different boundaries, such that 'major employment' sites include land which is not an existing employment location (eg land at Bro Tathan North as well as land at Cardiff Airport).

In order to avoid any confusion regarding the application of Policy EMP3, we believe it should be re-named 'NON EMPLOYMENT PROPOSALS ON ALLOCATED AND EXISTING EMPLOYMENT AREAS AND PREMISES'.

Furthermore, the opening paragraph of text to Policy EMP4 cross refers to Policy EMP2: 'Development proposals on existing employment sites and premises identified in Policy EMP2 will be subject to the following restrictions:...' Policy EMP2 relates to MOD St Athan. We believe this cross reference should be to Policy EMP3

Suggested Change

Reword Policy EMP4-'NON EMPLOYMENT PROPOSALS ON ALLOCATED AND EXISTING EMPLOYMENT AREAS AND PREMISES'.

Opening paragraph of text to Policy EMP4 cross refers to Policy EMP2 MOD St Athan, this should refer to Policy MP3.

Council Response

It is considered that Policy SP14 is already clear that proposals on allocated employment sites should be for B1, B2 or B8, although on major employment allocations, complementary ancillary non-B1 uses may be permissible. The inclusion of allocated sites in the title of Policy EMP4 would result in policy duplication.

Proposed Change

Amend incorrect policy cross references from Policy EMP2 to Policy EMP3

6239 - Associated British Ports - Object

ABP objects to this policy. It is overly restrictive in respect of the Use Classes set out (B1, B2 and B8).

With regards to Port land, and other employment land, many of the proposed and promoted uses within the RLDP are associated with a suis generis use, including renewable energy and sustainable development opportunities. These do not necessarily fit neatly into the stated use classes, and the text of this policy, as drafted, suggests that those uses would not be compliant. This is an unintended consequence of an effort to limit other types of uses within employment land (eg. retail).

Proposed Suggested Change

It is suggested that the text is amended as suggested

Non B1, B2 and B8 and suis generis uses will be restricted to ancillary services or facilities associated with an existing or proposed employment use that would serve employees on the wider employment site where:

Council Response

In respect of acceptable uses with the Operational Port of Barry, the Deposit RLDP contains two policies that are relevant to future uses within the Port. Firstly, Policy EMP 4 which ascertains that on major employment sites (which include the Port of Barry), the primary employment uses will be B1, B2 and B8, with ancillary use being permitted where this would not undermine the role and function of the employment use. This is consistent with the recommendations of the Council's Employment Land Review (Background Paper 12) which states at Paragraph 9.17 that:

"*The highest policy protections be given to the six identified Major Employment Sites. Non - B Class uses should not normally be allowed in Major Employment Sites*"

In addition, Policy EMP1 identifies the operational port as one of two regeneration employment areas, where for B1, B2 and B8 and Low and Zero Carbon related employment and infrastructure proposals will be supported. The supporting justification to this policy at paragraph 6.284 provides further clarification in respect of the port:

"The Port of Barry Employment Regeneration Opportunity Area will comprise B1, B2, B8 uses, renewable energy generation and emerging clean growth infrastructure. Potential uses on the Port may include chemical manufacturing, green energy production, carbon capture facilities, hydrogen production, PV generation and on Port wind turbines. To adapt to climate change, new development in the port will also need to incorporate the necessary measures to address flood risk."

On the basis of the above, the Council considers that there is appropriate flexibility with the Deposit RLDP to facilitate a range of employment uses within the operational port of Barry without the need for additional wording to Policy EMP4 as suggested.

6565 - Renishaw Plc - Comment

General support is given to Policy EMP4 which seeks to restrict the development of non-B1, B2 and B8 uses to ancillary services and facilities associated with an existing or proposed employment use.

However, the Policy should provide greater flexibility to allow for appropriate employment generating proposals which complement the existing uses and which may not clearly fall within the B1, B2 and B8 use class. This flexibility is essential in order to allow the sites to respond to changing market demand and emerging markets

Suggested Changes

Policy should provide greater flexibility to allow for appropriate employment generating proposals which complement the existing uses, and which may not clearly fall within the B1, B2 and B8 use class.

Council Response

Policy EMP 4 states that on major employment sites (which includes the Renishaw site allocated under Policy SP14.4 (Land to the South of Junction 34 of the M4, Hensol) primary employment uses will be B1, B2 and B8, with ancillary use being permitted where this would not undermine the role and function of the employment use. This is consistent with the recommendations of the Council's Employment Land Review (Background Paper 12) which states at Paragraph 9.17 that:

"The highest policy protections be given to the six identified Major Employment Sites. Non - B Class uses should not normally be allowed in Major Employment Sites."

It is also noted that a planning application has been approved for Land to the South of Junction 34 of the M4, Hensol (ref 2021/00899/EAO) for the provision of for B1, B2 and B8 uses alongside a hotel/residential training centre (C1/C2) and ancillary A1, A2, A3 uses. This illustrates that the approach of Policy EMP4 provides sufficient flexibility to enable officers to determine what is considered a suitable level of ancillary uses on allocated and existing employment sites, and in in respect of site SP14.4 this matter has been considered in the approval of the current planning application. Accordingly, the Council is of the view that the policy provides sufficient flexibility for the provision of non-employment ancillary uses on employment sites, whilst ensuring that their role as important sources of employment is protected from incremental changes.

EMP6 - NEW RURAL DIVERSIFICATION AND EMPLOYMENT USES IN THE COUNTRYSIDE

3 representations (2 Objections, 1 comment) were received in respect of Policy EMP6 New Rural Diversification and Employment Uses in the Countryside.

The representations raise concern that Policy EMP6 sufficiently recognise the economic, strategic, and employment role of food production and rural diversification within the Vale of Glamorgan, seeking amendments to EMP6 to reference and support to horticulture and farm diversification employment. The policy should also reference the re-use and adaption of existing commercial premises.

6154 - Taylor - Object

SF&G welcome the Council's recognition of supporting a vibrant countryside, including local employment, farming, and rural businesses, as outlined in policy EMP3. We suggest emphasising the importance of Wales' self-sufficiency through land-based food production in Wales. Policies SP5 and EMP6 should promote farm diversification aligned with the Sustainable Farming Scheme, encouraging smaller-scale farms that produce high food and employment yields. Given the decline in UK sheep farming, horticulture should be acknowledged as a significant rural employer, with diversification and innovative farming methods central to this policy.

Suggested Change

Reference to horticulture and farm diversification employment is needed.

Council Response

It is considered that Policy EMP6 would not exclude proposals for horticulture. There is a reference to farm diversification bullet point 1 of Policy EMP6.

6724 - Cardiff and Vale University Health Board - Comment

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Suggested Change

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses.

Council Response

It is considered that Policy EMP6 would not exclude proposals for local food production or other models of food production referred to in the representation

7241 – Woodwise Limited (Geraint John Planning) – Object

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 additional wording is added into Policy EMP6 outlined below.

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”.

Suggested Change

Policy EMP6 outlined should be amended to include the following additional text in brackets:

"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 building[**s**] 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**]"

Council response

The policy allows for the reuse of existing rural buildings in association with rural enterprise or farm diversification. The term 'rural buildings' would encompass existing commercial premises in rural locations where these are for rural enterprises. It is therefore considered unnecessary to include the first section of text.

Similarly, the policy already allows for small scale employment uses that are well related to rural settlements or existing farm complexes. Any proposals must be considered against Criterion 1 of EMP6, which states that proposals will only be permitted where there is a proven need for the development in a rural location. The inclusion of the suggested text would imply that any extensions to existing employment sites would be acceptable when this would not necessarily be the case as each would need to be considered on their own merits. The suggested amendment is not therefore considered necessary.

SP15 - SUSTAINABLE TOURISM

2 representations (1 support, 1 comment) were received in respect of Policy SP15 Sustainable Tourism.

Representations comments on the need to improve water quality in the area, whilst South Wales Police highlighted the importance in engaging with SWP in the planning of tourism events.

Support

5864 – Smith - Support

Need to rapidly improve water quality in the area as this is having an impact of events.

Council Response

The comments are noted.

6685 - South Wales Police – Secured by Design Officer - Comment

Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.

Council Response

The comments are noted. The Council works closely with South Wales Police in the planning of its major tourism events.

SP16 CLIMATE CHANGE MITIGATION AND ADAPTATION

A total of 12 duly made representations were received in respect of Policy SP16 Climate Change Mitigation and Adaptation (4 support, 2 comments, 5 objections). The key issues raised include how food production is considered in the policy, whether a site-specific modal shift target should be set, the applicability of the policy to all development proposals and the robustness of the evidence base behind the policy.

STATUTORY CONSULTEE RESPONSES

6733 – Cardiff and Vale University Health Board – Comment

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food production, short supply chains or sustainable farming practices.

Council response

The Council acknowledges the important role that food systems and agricultural practices can play in reducing emissions and contributing to wider sustainability objectives.

However, Policy SP16 is a strategic policy that establishes the overarching framework for climate change mitigation and adaptation across the Local Development Plan. Its purpose is to provide a high-level policy context rather than address every sector or activity that may contribute to climate change objectives. The policy is intentionally broad to ensure it applies across all forms of development and can support a wide range of measures that reduce emissions and improve resilience to climate change.

The benefits associated with local food production, shorter supply chains and sustainable farming practices are noted. However, these matters are primarily associated with agricultural land management, food production and rural economic activity, rather than the land-use planning considerations that the strategic climate change policy is intended to address.

It is therefore considered that the current wording of Policy SP16 provides an appropriate strategic framework for climate change mitigation and adaptation and that the addition of specific references to food systems, local food production and sustainable farming practices is not necessary to make the Plan sound**.**

6941 – Penarth Town Council – Support

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16.

Council response

Support is noted.

6969 – Dwr Cymru Welsh Water – Support

We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources. We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.

Council response

Support is noted.

INDIVIDUAL RESPONSES

SUPPORT

5710 – Cardiff Capital Region Energy

CCR Energy welcomes the emphasis within SP16 on climate change mitigation and adaptation, including consideration of flood risk at the former Aberthaw Power Station. The proposed redevelopment of the site as the Cardiff Capital Region Aberthaw Green Energy Park will incorporate comprehensive Flood Consequence Assessments and appropriate mitigation measures to ensure safe, resilient development. By integrating sustainable drainage systems, green infrastructure, and regenerative design principles, the proposals will address tidal and fluvial flood risk, support climate resilience, and contribute to the Vale of Glamorgan's broader zero-carbon and environmental objectives, demonstrating exemplar practice in sustainable redevelopment of previously developed land.

Council response

The support and comments are noted.

5873 – Davies

I fully support the ambition of VoGC to address, mitigate and adapt to anthropogenic climate change.

Council response

The support is noted.

7198 – H Jones, L Sungar and P John (Herbert R Thomas)

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

Council response

The support is noted.

COMMENTS/OBJECTIONS

5399 – Reed – Object

This Policy should set a target for reducing the need to travel as well as a modal split target for every development site. At the moment the plan has words and lots of unsustainable development which will add to the global energy crisis.

Suggested Change

Transport Modal split targets for new developments.

Protecting land from development where crops have been grown. This would include 1 2 and 3 a b and c.

Council response

The recommendation to include modal split targets for every development site is not supported. Whilst the Council recognises the importance of promoting sustainable travel and reducing reliance on the private car, it would not be appropriate or practical to set site-specific modal split targets for every development allocation within the Plan. Travel behaviour is influenced by a wide range of factors, including the location, size, mix of uses, accessibility to services, availability of public transport, and wider transport infrastructure, many of which extend beyond the control of individual developments.

The Plan already contains a policy framework that seeks to reduce the need to travel, prioritise development in sustainable locations, and promote walking, cycling and public transport. Detailed transport assessments, travel plans and mitigation measures will be required where appropriate at planning application stage. These mechanisms provide a more proportionate and evidence-based approach to assessing the transport impacts of individual proposals and identifying measures to encourage sustainable travel.

Furthermore, the establishment and monitoring of modal split targets for every site would require detailed baseline data that may not be available or proportionate, particularly for smaller allocations.

The Council's approach to the consideration of the Best and Most Versatile (BMV) agricultural land is set out in the Best and Most Versatile Agricultural Land Background Paper (BP23A), where it is explained how the plan has sought to avoid BMV land wherever

possible. It should be noted that national planning policy defines the Best and Most Agricultural Land as Grade 1, 2 and 3a. Land designated as Grade 3b, 4 or 5 is not protected by national planning policy.

5711 – Entwistle – Comment

I support his in principle but feel many areas within the proposed LDP do not align with this policy. Many new housing developments proposed are on Greenfield sites in poor locations and will place heavy reliance on private vehicle use and associated contributions to climate change.

Council response

The support for the principle is noted. Whilst the RLDP has sought to allocate previously developed land in line with the search sequence set out in Planning Policy Wales, it has been necessary to allocate some greenfield land due to the lack of deliverable brownfield sites in sustainable locations within the Vale. The sites allocated are located within or adjacent to settlements that are considered sustainable due to the range of services and facilities available, which helps to reduce the need to travel and supports the use of sustainable transport options.

6044 – Barratt Redrow Homes (Lichfields) - Object
6079 - Barratt Redrow Homes (Lichfields) - Object
It is observed that the wording of Policy SP16 states that “all development proposals” should address the causes of climate change to demonstrate policy compliance. However it is considered that it would not be feasible or even possible to provide all of the information required by Policy SP16 at the outline planning application stage and that some of the information requirements of Policy SP16 can only be expected to be provided at detailed (reserved matters/full) planning application stage. Furthermore, care needs to be taken to ensure that any additional decarbonisation policy aspirations, especially for affordable housing-led schemes, are carefully considered in terms of overall viability. It is clear that there are some requirements in Policy SP16 that will be unachievable in many new residential developments, for example, requirements 7 relating to the optimisation of energy supply and distribution options, including provision of district heat networks.

Suggested change

The wording of Policy SP16 must therefore be amended to acknowledge that the above list will apply to “All development proposals, where possible...”

The term “maximising” should also be removed entirely from Policy SP16 as the term is imprecise. Proposals should be encouraged to be efficient but to require demonstration of maximisation could also lead to viability issues.

The proposed amendments will ensure that Policy SP16 will meet the third test of soundness (Will the Plan deliver?).

Council response

Policy SP16 is a strategic policy that establishes the overarching requirement for development to address climate change mitigation and adaptation. In light of the declared climate emergency, it is considered that it is appropriate for this policy to apply to all types of development as even minor developments can be designed in a way that can mitigates its impact, whether this be through siting, design or materials used, or through the enhancement of green infrastructure. It is

The Council does not consider that the wording creates a requirement for all information relating to every criterion to be submitted at the outline planning application stage. The level of information expected will be proportionate to the nature, scale and stage of the application and will be assessed having regard to the details reasonably available at that point in the development process. Matters requiring more detailed technical assessment can be addressed through subsequent reserved matters or detailed applications where appropriate. This flexibility is inherent within the development management process and does not require qualification within the policy wording.

The Council also does not support the insertion of the phrase 'where possible' as this would introduce ambiguity and weaken the effectiveness of the policy by creating uncertainty regarding the extent to which applicants are expected to address climate change considerations. The current wording provides a clear policy framework while allowing decision-makers to exercise planning judgement on a case-by-case basis.

The Council also does not agree that the term 'maximising' should be removed as its removal will weaken the policy objectives. The term is commonly used in planning policy and reflects the need to secure the greatest reasonable contribution towards climate change mitigation and adaptation objectives. It does not imply an absolute requirement regardless of site-specific constraints, viability considerations, or technical feasibility. Rather, it requires applicants to demonstrate that opportunities have been appropriately explored and incorporated into the design and development of proposals.

With regards to criterion 7 on the optimisation of energy supply and distribution options, including the provision of district heat networks, the policy does not require such infrastructure to be delivered in every development. Instead, applicants are expected to consider and demonstrate how opportunities for low-carbon and efficient energy solutions have been assessed in the context of the specific proposal.

The Council is satisfied that Policy SP16 strikes an appropriate balance between ambition and deliverability and provides a robust framework to support the Plan's climate change objectives. The suggested amendments would reduce the effectiveness and certainty of the policy and are not considered necessary to ensure the Plan is sound.

6162 – Taylor – Object

The Vale has already recognised there's a climate crisis. The plan gives mitigation and adaption as the 2 elements, though perhaps the draft plan feels like it focusses more on mitigation with adaption being more secondary.

For SP16 we suggest more on community-scale climate action that help with food security, carbon sequestration, biodiversity gains, social cohesion, and cooling e.g. community gardens and orchards local food growing shared green spaces local repair and reuse hubs tree planting (but not just for green design with the aesthetic/landscaping but trees for biodiversity, shading, food)

No. 2 Circular Economy, the statement focuses on buildings and materials. The circular economy also applies to biological nutrients and waste. Community gardens are hubs for the circular economy—composting local green waste and recycling nutrients back into the soil. Suggest adding "community-scale resource recovery" to the circular economy principles

No. 5 & 8 Green infrastructure, the 2 statements identify only carbon sequestration and urban shading & cooling. Green infrastructure should have multifunctional roles i.e. not just be "trees to look at". For GI there should be measurable standards. Welsh Government and NRW have spent considerable resources developing Green Infrastructure toolkits and these should be used better within the LDP. Suggestion: that "Green Infrastructure" specifically includes Community Managed Green Space. These spaces provide higher biodiversity value and better social outcomes than "standard" landscaping PLUS food especially if orchards are planted.

No. 10 Nature-Based Solutions The policy links nature-based solutions primarily to water/flooding. Nature-based solutions can also address social heat stress and mental health during extreme weather. Suggestion: add community gardens, community allotments and orchards, which provide cooling and permeable surfaces while simultaneously tackling the "nature deficit" in urban areas.

Suggested change

Encouragement for community focussed initiatives that mitigate and help adapt to climate change.

Council response

The RLDP should be read as a whole and does not rely on a single policy to address climate change. The matters raised are already addressed through other policies within the Plan. For example, Policy SP16 should be considered alongside Policy SP19 (Green Infrastructure), which already recognises the multifunctional role of green infrastructure and supports the provision of community growing spaces. The supporting text to Policy SP19 also references the wider benefits of green infrastructure from a mental health perspective.

The circular economy is also addressed through Policy SP17 (Sustainable Waste Management), where the reuse and recovery of waste materials are central policy

considerations. It is understood that, from a circular economy perspective, biological nutrients refer to the recovery and reuse of unavoidable organic waste arising from agricultural and food production processes, including the generation of bioenergy as a substitute for fossil fuels. However, the management and reuse of waste products arising from agricultural and food production processes generally falls outside the remit of the RLDP and is not a matter that can be effectively controlled through planning policy. This differs from construction and demolition waste, which can be directly linked to specific development proposals requiring planning permission and can therefore be influenced through the planning system.

In light of the above, the matters raised are either already addressed elsewhere in the Plan or fall outside the scope of the RLDP. It is therefore not considered necessary or appropriate to include additional policy criteria in response to this representation.

7227 – Squires – Object

I am concerned that, as drafted, the Plan does not provide enough evidence or practical measures to ensure new development is sustainable and climate resilient. The RLDP is not fully justified, effective, or consistent with national policy on climate change and sustainability. Key gaps include alignment with carbon reduction targets, enforceable delivery of low carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure. Without clear policies and enforceable commitments on low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure, the Plan risks harming both the environment and the wellbeing of communities. I am worried that the Plan relies too much on people walking, cycling, or using public transport without clear plans to make this happen. There is also little information on whether new homes will be energy-efficient or if systems to manage rainfall and reduce flooding (like sustainable drainage) will be properly installed and maintained. I want to see clear, practical measures to make low-carbon travel, energy-efficient homes, and safe drainage a reality. The Plan does not clearly show how new developments or existing infrastructure will be designed to cope with the risks of extreme weather events. I would like to have assurance that any buildings, roads, drainage, and community facilities will be climate-resilient and protect people's health and safety.

Council response

The Council considers that the Plan has been prepared in accordance with national planning policy and which demonstrates that the strategy and policies will contribute towards sustainable development, climate change mitigation and adaptation objectives.

The RLDP contains a comprehensive framework of strategic and development management policies that seek to reduce carbon emissions, promote sustainable patterns of development, support active travel and public transport, protect and enhance green infrastructure, manage flood risk, and increase biodiversity. The Plan's spatial strategy

focuses growth within sustainable settlements where residents have access to services, facilities, employment opportunities and sustainable transport options, thereby reducing the need to travel and supporting modal shift away from private car use.

The Plan is supported by an extensive evidence base. This includes BP33 and BP33A, which set out the policy basis and technical evidence for Policy CC1 Residential Operational Net Zero Carbon Development, requiring new dwellings to be net zero in operation. It includes the Local Area Energy Plan (BP39), a Strategic Flood Consequences Assessment (BP21) and Flooding Background Paper (BP21A) and a Strategic Transport Assessment (BP14/BP14A).

The RLDP should be read as a whole and does not rely on a single policy to address climate change. A range of policies require development proposals to incorporate sustainable design principles, support active travel, provide appropriate green and blue infrastructure, manage surface water through sustainable drainage systems (SuDS), and avoid areas at unacceptable risk of flooding. In addition, all development proposals will be required to comply with relevant national legislation and statutory requirements relating to matters such as sustainable drainage.

The Council acknowledges the importance of ensuring that new development is resilient to the impacts of climate change, including increased temperatures, changing rainfall patterns and more frequent extreme weather events. The Plan includes policies relating to placemaking, green infrastructure, biodiversity, flood risk and sustainable drainage that collectively seek to ensure that new development is designed to respond appropriately to these challenges. The detailed design, construction standards and technical requirements for individual developments will be considered through the planning application process and other regulatory regimes.

POLICY CC1 – RESIDENTIAL OPERATIONAL NET ZERO CARBON DEVELOPMENT

A total of 22 comments were made in respect of Policy CC1 – Residential Operational Net Zero Carbon Development.

This is a new policy which requires new dwellings to meet operational net zero standards. These standards will exceed current and proposed building regulations in response to the Vale of Glamorgan's declared climate emergency. The policy has received a mixed response for individual respondents, with some support but also some comments on its enforceability and the value the policy has when considered against other factors. The individual comments are dealt with in the first part of the report.

Comments have also been made by the housebuilding industry. Whilst some developers were supportive of the principle, developers generally objected to the detailed requirements of the policy. As many developers raised similar concerns, this has been addressed as a composite response. The key concerns of the development industry were around the necessity of the policy, costs and viability, and how the policy would be implemented in practice.

INDIVIDUAL COMMENTS

SUPPORT

5874 - Davies

I fully support the ambition of VoGC to address, mitigate and adapt to anthropogenic climate change by applying demand-based metrics to reduce carbon emissions from the built environment. Monmouthshire County Council are advancing similar proposals to Inspection this summer and multiple LAs in England have successfully introduced similar targets, defining space heating demand (SHD) and energy use intensity (EUI) targets as scientifically robust metrics that align with best practice for achieving Net Zero emissions. It has been exhaustively demonstrated that better performing buildings, those with improved (reduced) SHD and EUI, more economically achieve operational Net Zero than those delivered to business as usual (BAU) and deliver considerable lifecycle cost savings for occupants. The Building Regulations methodology through the standard assessment procedure (SAP) is deeply flawed and inconsistent with efficiently or effectively achieving Net Zero (as the 2021 report for the Department for Business, Energy and Industrial Strategy "Making SAP and RdSAP 11 fit for Net Zero" concluded) and the replacement Home Energy Model (HEM) has not been demonstrated to be any better aligned. In the context of the declared Climate Emergency, action by the Senedd and Westminster is not moving fast enough to deliver our legal commitments to decarbonise.

Council Response

Support is noted.

5712 - Entwistle

I support this policy but do question why such a long period for the initial space heating demand requirements and energy use requirements. The council should be pushing for the higher efficiency standards immediately rather than up until 2030. It feels like the council is deliberately giving housing developers an opportunity to increase profits and build cheaper less efficient housing by having these dates knowing the vast majority of new housing within the plan is likely to be delivered before 2030.

Council Response

Support is noted. It should be noted that the policy proposes a higher standard of energy performance from adoption of the plan than is currently required by Building Regulations, and a second step up in requirements by 2030. The phased approach is in recognition that there are potential cost implications associated with the policy initiative, which are likely to reduce over time as technologies become more mainstream. The phasing also reflects the need to upskill the labour force in the standard of workmanship required to meet more stringent targets.

7214 - Penarth Town Council

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

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

Council Response

Support is noted.

7075 - Barratt Redrow Homes (Highlight Planning)

Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development.

Council Response

Support for the wider objective of the policy is welcomed.

COMMENTS/OBJECTIONS

4623 - Barton - comment

Traditional Architecture has the greatest ability to combat the Climate Crisis through embodied carbon.

Council response

The comment is noted. The policy is not prescriptive as to what architecture styles should be used, provided the net zero standards can be achieved.

4625 - Barton - comment

Fine but must harness TA with appropriate retrofitting done discreetly.

Council response

The comment is noted. The policy relates to new development rather than retrofitting existing properties.

6600 - Barton – comment

Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt Traditional Architecture principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.

Council response

The comment is noted. The policy is not prescriptive as to what architecture styles should be used, provided the net zero standards can be achieved.

5400 - Reed - objection

Policy is pointless if the developments are located in the wrong areas as the need to travel will far outweigh any net zero houses.

Suggested change

Developments need to be located in the main settlements so that the need to travel is reduced for everyday activities such as going to comprehensive school.

Council response

The Council does not agree that the net zero policy for residential is rendered ineffective by the location of development. Firstly, the purpose of the net zero policy is to ensure that all new residential development minimises operational carbon emissions and contributes positively towards decarbonisation. This includes energy efficiency, renewable energy generation, and low-carbon design. These measures will deliver significant, measurable reductions in emissions over the lifetime of development, irrespective of location.

The RLDP must be read as a whole. The spatial strategy and site allocations have been informed by a sustainable development approach which seeks to direct growth to the most appropriate and accessible locations. Therefore, issues relating to the location of development and travel demand are addressed through the spatial strategy, settlement hierarchy, and transport policies, rather than the net zero policy itself.

It is not accurate to suggest that transport emissions would necessarily outweigh building-related emissions. Both sources of emissions are significant and must be addressed in parallel. National planning policy (including Future Wales and Planning Policy Wales) is clear that decarbonisation requires a multi-faceted approach, including both reducing emissions from buildings and reducing emissions from transport. As such, the net zero policy forms an essential component of this wider decarbonisation strategy.

5762 - Vincent – comment

Net zero building techniques would be a wonderful thing, but have Planning had anything but "vague promises" from Building firms? Are there statutory teeth to deal with defaulting behavior? From everything I have read recently about t such firms in the UK, compared to Europe, there can be a deep reluctance to engage in net zero building techniques. It is seen to eat into their profits. I am sure promises might be made but (as in the recent Barry waterfront developments) unfulfilled promises (and contracts) from such firms often limp along into long expensive legal cases.

Council response

Policy CC1 states that compliance with the requirements of the policy will need to be demonstrated through the submission of an Energy Report, which will be a condition of the planning permission. The Energy Report will be scrutinised to establish that the required standards have been achieved. In the event of an Energy Report not being submitted, or the Energy Report failing to demonstrate that the required standards have been met, the development may be subject to enforcement action.

COMPOSITE RESPONSE

Concerns raised by development industry

Representation ID	Respondent Name	Representation Type
5963	HBF (Mr Mark Harris) [538]	Object
6044	Barratt Redrow Homes [2669]	Object
6047/6080	Barratt Redrow Homes [2669]	Object
6079	Barratt Redrow Homes [2669]	Object
6080	Barratt Redrow Homes [2669]	Object
6712	Persimmon Homes (East Wales) [1068] (Asbri Planning)	Object
6748	Hallam Land Management [854] (Savills)	Object
6788	Persimmon Homes (East Wales) [1068] (Boyer Planning)	Object
6852	Taylor Wimpey [386] (Savills)	Object
6921	Barratt Redrow Homes [2669] (Boyer Planning)	Object
7076/7077	Barratt Redrow Homes [2669] (Highlight Planning)	Object
7115/7116	Barratt Redrow Homes [2669] (Turley)	Object
7199	H Jones, L Sungur and P John [3741] (Herbert R Thomas)	Comment

Issue - Duplication and consistency with other standards

- The policy duplicates matters already addressed through Welsh Government Building Regulations.
- Energy performance standards should be controlled through Building Control, not planning policy.
- The policy is premature, given future changes to requirements.
- A Written Ministerial Statement by then Housing and Planning Minister made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations.
- The creation of local standards would create inconsistency between local authorities and undermine a nationally consistent regulatory framework.
- Other recently adopted LDPs (Bridgend and Merthyr Tydfil) did not include such policies.
- The proposed shift in standards from April 2030 represents a substantial and abrupt escalation in expectations.

Council response

The Vale of Glamorgan Council declared a Climate Emergency in 2019, and mitigating and adapting to climate change is a strategic objective for the RLDP and a central component of the vision, strategy and policy framework. Responding to the declared Climate Emergency is also a fundamental part of national planning policy. In order to respond to both the national and local policy ambitions, it is necessary for there to be a step change in local policy to reduce carbon emissions from new dwellings.

As detailed in BP33A Net Zero Buildings Background Paper, Welsh Government launched a consultation on Changes to Part L (conservation of fuel and power), Part O (overheating) and Part F (ventilation) of the Building Regulations for dwellings and non-domestic buildings. The consultation presented two options which sought to uplift the energy efficiency standard and require low carbon heating systems as standard. Option 1 as presented in the consultation represents a substantial improvement on 2022 standards but would be below the requirements of Policy CC1. Consultation Option 2 was more stringent and would be broadly equivalent to the standards required under Policy CC1 in the first part of the plan period to 2030.

The consultation closed on 17th November 2025 and at the time that the RLDP was placed on Deposit, the outcome of the consultation was unknown. However, on 6th April 2026, the Welsh Government published an updated Approved Document L (Conservation of fuel and power and the minimisation of greenhouse gas emissions) and Approved Document F (Ventilation). The updated Part L was based on Option 1 of the consultation i.e. the less stringent option of the two that were consulted on. The reasons given for the Welsh Government favouring Option 1 rather than Option 2 were that it would be an appropriate next step up in energy efficiency standards, balancing capital cost with good performance.

As detailed in the Summary of Responses document for the consultation, those that supported Option 1 did so as it improved flexibility, would result in a lower cost to achieve and may require less PV. Those who supported Option 2 did so because it is more ambitious, accords with the fabric first approach, would deal more effectively with fuel poverty and the climate emergency and would avoid the need for future retrofitting. Option 1 would reduce CO2 by 78%, whereas Option 2 would reduce it by 94%.

It should be noted that Option 2 has been included in a secondary notional specification within AD: L (Wales) 2026 (Appendix E). Inclusion of MVHR and improved air permeability is used here to allow developers to leverage worse fabric u-values, offering potential capital expenditure savings. These fabric u-values could still be used to deliver housing typologies compliant with Policy CC1.

The new approved documents will apply to individual buildings that have not commenced by 4th March 2027. It is acknowledged that the updates to Building Regulations will be a significant improvement compared to the 2022 Building Regulations. However, in light of the policy context, including the declared climate emergency, it is considered that the RLDP should remain ambitious in this regard and should seek to maximise the standards that can be achieved, particularly when the evidence base demonstrates that higher standards are both feasible and viable.

It should be noted that the establishment of a threshold for the maximum space heating demand of a dwelling cannot be said to duplicate the provisions of Building Regulations as they do not apply this metric nor any absolute target but rely on relativistic assessment against benchmarks. Rather, space heating demand targets define a straightforward method for assessing and implementing the Energy Hierarchy for Planning described in PPW12.

It is recognised that defining a target for on-site renewable energy generation now duplicates the Building etc (Amendment) (Wales) Regulations 2026 captured in Approved Document L: Volume 1 (Wales) 2026, which requires on-site renewable energy generation for all new housing. Policy CC1 was developed 2 years prior to the publication of the amendment and requires estimated use to be balanced by on-site renewable generation potential to achieve Net Zero without waiting for the complete decarbonisation of the electrical grid.

Nowhere in the primary legislation or AD L: V1 Dwellings (Wales) 2026 does it state new homes must be fossil-fuel free or avoid connections to the gas grid. While use of these fuels may be discouraged by other instruments applied by the AD - minimum efficiencies established in Section 5; use of an air source heat pump (ASHP) in 'Appendix E Elemental specification for the TPER/TER/TEUI' - there is no explicit proscription on the use of fossil fuels or connection to the gas grid. Policy CC1 does not therefore duplicate a requirement in the legislative regimes in this matter, rather it aligns market housing with Welsh Development Quality Requirements 2021 to unify mechanical specifications across mixed tenure sites and respond appropriately to the climate emergency.

Reducing the assessment of operational performance to a post-planning matter limits the opportunities for cost-effective design optimisation. Decisions made during design and fixed by planning approvals - building form, amount and articulation of fenestration, provision of

passive solar strategies, etc. - significantly impact the potential operational performance of buildings and cannot be cost-effectively rectified. It is imperative this is given consideration through the design stage, as required by the Energy Hierarchy for Planning in PPW12.

While accepted the duplication of requirements is generally to be avoided, circumstances require urgent action is taken to adequately address the climate emergency.

PPW 12 paragraph 5.8.5 states:

"Planning authorities should assess strategic sites to identify opportunities to require higher sustainable building standards, including zero carbon, in their development plan. In bringing forward standards higher than the national minimum, which is set out in Building Regulations, planning authorities should ensure the proposed approach is based on robust evidence and has taken into account the economic viability of the scheme."

This paragraph requires local authorities to consider how higher sustainable building standards could be required in their development plan. While 5.8.5 makes reference to undertaking the assessment on strategic sites, nothing within the wording limits the application beyond this scope: the requirements are only that the proposed approach is based on robust evidence with no negative impact on economic viability.

The phased introduction of the policy will allow the industry sufficient time to prepare; it would not, therefore, represent an 'abrupt' step change.

The Council does not agree that the policy and case law specific to England, including the Written Ministerial Statement relating to the Future Homes Standard, is relevant to this policy direction. Planning and building regulation frameworks in Wales are devolved, and the policy approach taken by the Welsh Government is distinct. As such, the English Written Ministerial Statement and associated judicial decisions do not apply in Wales.

The Council acknowledges concerns about the potential for differing policy approaches across authorities. However, the Vale of Glamorgan is not the only local authority promoting a net zero dwellings policy. Monmouthshire County Council is also seeking to progress a similar policy, informed by an evidence base prepared by Spring Design, the same consultants that prepared the Vale's evidence base. It should be noted that the RLDP is a locally specific policy document, and there are a number of policy areas where local authority requirements differ. This is entirely appropriate.

It is also recognised that many national housebuilders operate beyond Wales and will therefore have experience of delivering homes to the required standards in specific English authorities where net zero carbon dwellings are already a requirement.

It is also not considered that the absence of equivalent policies in two recently adopted RLDPs in South East Wales undermines the soundness of Policy CC1. Each LDP is prepared based on its own evidence base and local context. The fact that other authorities have taken a different approach does not, in itself, render this Plan unsound. National policy does not require uniformity of approach across all authorities. Instead, it expects plans to be justified by proportionate evidence and aligned with overarching Welsh Government objectives.

The policy landscape relating to climate change and net zero development is evolving rapidly, and more recent plans are increasingly reflecting greater ambition in response to the climate emergency declaration and national decarbonisation commitments. The approach taken in this Plan reflects this.

Issue – Deliverability, Viability and Development Costs

- The policy would increase construction costs and would affect viability.
- Actual costs could be £15,000–£20,000 per dwelling, considerably higher than the Council's assumptions.
- There is a timing gap in the evidence as the cost assessments are for 2024, but the first completions are not forecast until 2028 or 2029. This creates unacceptable uncertainty.
- Viability evidence relied on a limited range of housing typologies.
- Insufficient evidence that the standards could be delivered consistently across mainstream housing developments.
- The policy does not reference development viability.
- Concerns that stringent requirements could delay or reduce housing delivery over the plan period.
- The policy could compromise the RLDP's ability to meet housing needs.

Council response

It is accepted that there may be additional costs associated with such the CC1 policy approach; however, assumptions reflecting these costs have already been factored into the viability modelling, as detailed in the Background Papers on Viability (BP42) and Net Zero Buildings (BP33/BP33A). It is therefore considered that there is a robust evidence base to support this policy approach.

The cost per unit cited by the developer of £15,000 to £20,000 to achieve net zero is noted. However, no evidence has been submitted on how this cost was calculated, the location or characteristics of the site that this applies to or what the baseline position was. It is also not clear if this cost has been offset against cost savings, for example, the savings from not requiring a gas boiler to be installed. BP42 Viability Assessment evidences the cost assumptions used in the modelling. BP42 also explains that, whilst a lower point in a wide range of costs is used, no account has been taken of any premium associated with buying a net zero home and the cost savings that would apply in running it.

A per dwelling assumption for the cost of net zero has been factored into both the high level and site-specific viability work equating to an uplift of £9,000 per dwelling, having regard to the costs in BP33. This high-level figure for testing was discussed with the development industry through two workshops on net zero and overall plan viability, as detailed in BP42 Viability Assessment. Representatives from the development industry did raise concerns

about the costs of the net zero policy at the workshop, but these were not substantiated with evidence. Whilst uplifts for England were cited, it was noted that different standards apply so a direct comparison cannot be made.

Notwithstanding this, it should be noted that sensitivity testing has been undertaken as part of the viability work to account for potential variations in build costs, values and other inputs. Furthermore, there remains an element of 'headroom' in the viability. This provides a reasonable and proportionate level of flexibility should costs ultimately be higher than anticipated.

As explained in BP42, the figure of £9,000 per dwelling for the highest standard post April 2030 is the lowest point in the range of costs, but this is balanced against the fact that no uplift has been applied to account for the increased value that net zero status could potentially put on new dwellings. BP42 references the cost of achieving net zero equates to just 3% of the average house price in the Vale, but there is evidence that it could result in a consequential increase in house prices by 10-20%.

The net zero carbon buildings feasibility study (BP33) has considered three common dwelling types in order to demonstrate the feasibility of the policy approach. This included a four bedroom detached dwelling, a pair of two bedroom semi-detached houses and a block of 9 one-bed two person flats. The flat represents the highest density type of dwelling likely to be delivered in the Vale, whereas the detached dwelling is at the other end of the spectrum in terms of commonly built house types, particularly in the context of the minimum densities required in Policy PDG2. BP33 demonstrates that it will be harder to achieve net zero in detached houses as these properties have the worst form factor (i.e. the walls, roof and floor are all exposed and therefore the potential for heat loss is greater and there is a greater heating demand), but it was still feasible. The study not only tested the worst-case scenario for property type, but also the least favourable orientation for solar gains (east-west). By testing the most challenging property, it follows that any less challenging property types in terms of form factor or orientation would be feasible and therefore it was not necessary to test a wider range of property types. The approach is also broadly consistent with the modelling undertaken by Welsh Government as part of the consultation on changes to Building Regulations, as this only considered four standard dwelling types rather than a full range of potential unit designs.

The Council does not consider that the time lag between the cost baseline and scheme delivery gives rise to 'unacceptable uncertainty.' Viability and cost assumptions are based on the best available evidence at a fixed point in time to ensure consistency and transparency across the plan. This approach accords with national policy and guidance, which recognises that development plans operate over long timeframes and cannot reflect continually fluctuating market conditions in real time.

The upcoming changes to Building Regulations will require as standard certain elements that are not standard requirements of the 2022 Building Regulations, including Air Source Heat Pumps (AHSP) and solar photovoltaics (PV). There is evidence that costs for new technologies, such as those associated with net zero, often decrease over time rather than increase as they become more widely available. This is due to economies of scale, increased efficiency, innovation and supply chain maturation and competition.

Aggregation of demand is vital to give supply chains the confidence to invest in, develop and retain the skills, knowledge, experiences and behaviours (SKEBs) to cost-effectively deliver the higher operational standards required by Policy CC1. If application were limited to strategic sites then it would risk incurring higher costs on those developments - where the relevant SKEBs might be perceived as 'specialist' and therefore charged at a premium - without providing a pipeline of developments to keep appropriately skilled, knowledgeable and experienced professionals working in the Vale. Similarly, without a visible pipeline of projects applying these standards, there is no incentive for local developers or contractors to invest in themselves or their employees to develop the relevant SKEBs.

Tai ar y Cyd offers a vehicle to further support Policy CC1. A collaboration between 27 social housing providers - including the Vale of Glamorgan Council - it offers a pattern book of house types and timber construction details to deliver high quality social housing. At its core, it applies the same critical metrics as Policy CC1 to enshrine affordable warmth for tenants within new build social housing. Extensive engagement with Welsh timber frame manufacturers and other supply chain members has informed the outcomes while facilitating an assessment of extant supply chain SKEBs. The collaboration also supplies a visible pipeline of projects applying these standards to Welsh supply chain members so they have the confidence to invest in developing/ expanding the relevant SKEBs within their businesses.

Considered together with VoGC's proposed Policy SP8 Affordable Housing Requirements, which aims for 30-50% of housing on new development sites to be social, the majority of new developments should be collaborations with social housing providers requiring their input and application of Policy CC1-aligned, Tai ar y Cyd standards. SKEBs developed through the delivery of Tai ar y Cyd housing will therefore be immediately transferable to market housing on mixed tenure developments and therefore support the broader housing supply.

By focusing specifically on cost-effectively reducing energy demand - the highest priority in the Energy Hierarchy for Planning in PPW12 - Policy CC1 should, as the commentary contained within the evidence, reduce the required provision of photovoltaic panels to offset regulated energy use and reduce the sizes of heat pumps and related infrastructure across all assessed typologies. This provides capital expenditure benefits to developers and can further assist with viability.

With regards to overall scheme viability, the policy deliberately does not specifically include a criterion that would allow a developer to avoid meeting the requirements if the scheme is demonstrated to be unviable. However, it must be remembered that the plan must be read as a whole. A development would need to adhere to Policy SP8 on Affordable Housing Requirements and Policy SP15 on Community Infrastructure and Planning Obligations, both of which reference development viability as a consideration when determining requirements. The costs of net zero buildings will be considered as part of the wider assessment of viability where necessary.

Given the level of background evidence and viability testing that underpins the policy and wider plan, the Council does not consider that the policy requirement would affect the delivery of housing.

Issue - Clarity and Implementation

- Clarity required on whether the policy applies to regulated energy only or includes unregulated energy use.
- The energy use intensity element of the policy should be removed.
- Clarification needed on how contributions to the Council's Project Zero Fund would be calculated.
- Query whether compliance can realistically be demonstrated at outline application stage.
- Need to greater flexibility where on-site generation cannot be achieved.
- The level of detail required in energy reports is unclear.
- What would happen if future changes to Building Regulations exceed current requirements.
- Policy requirements should be linked to the date planning permission is granted, rather than the RLDP adoption date.
- Query how Section 73 and non-material amendments would be addressed.

Council response

One of the key metrics set out in the policy is Energy Use Intensity (EUI). Whilst a high level definition is provided in the supporting text for the policy, it is explained within the Net Zero Buildings evidence base (BP33/BP33A) that the measure includes both regulated energy (heating, hot water, cooling, ventilation, and lighting) and unregulated energy (plug loads and equipment e.g. kitchen white goods, ICT/AV equipment). It does not include charging of electric vehicles. The energy use intensity target is a key element of the policy initiative and should be retained alongside a target for space heating demand.

Policy CC1 states that compliance with the requirements of the policy will need to be demonstrated through the submission of an Energy Report, which will be a condition of the

planning permission. The Energy Report will be scrutinised to establish that the required standards have been achieved. In the event of an Energy Report not being submitted, or the Energy Report failing to demonstrate that the required standards have been met, the development may be subject to enforcement action.

In addition, Supplementary Planning Guidance (SPG) will be prepared to provide further details on the implementation of Policy CC1. This will clarify the level of detail required at outline and detailed application stage. It will also provide further details on the circumstances where the Council's Project Zero Fund will be utilised for offsetting and how this will be calculated.

With regards to the timescales for implementation, it is considered that this policy should be implemented in the same way as other policies in the plan and apply from the adoption of the plan. Housebuilders should be aware of the emerging policy when considering layouts and building orientation, albeit this should already be a key consideration as the Planning Policy Wales national sustainable placemaking outcomes include resilience to climate change.

Non material amendment applications would not be required to meet the CC1 standards, but potentially Section 73 applications, in respect of changes to conditions, would be required to meet them as these applications are considered to be new applications.

In the event that future Building Regulation requirements exceed the requirements of Policy CC1, then the most recent national policy will take precedence. This has been the case in other policy areas where new more stringent national policy is published after an adoption of a plan, for example Chapter 6 of PPW on biodiversity.

If Policy CC1 is adopted as currently proposed, homes complying with the policy might only start to be completed in early 2029. This provides the Council sufficient time following adoption to prepare an SPG detailing the routes to compliance for developers.

The additional burden of proof and criminal liability for misrepresentation now imposed upon developers and the other statutory dutyholders through Building etc (Amendment) (Wales) Regulations 2026 affords protections previously unavailable to homeowners/ occupiers. Though changes were only applied on 1 July 2026 and therefore full implementation is untested in the Welsh context, this regulatory reform was designed to close the performance gap throughout the construction industry: on this basis, "as-built performance surveys" could include Building Regulations Wales Part L (BRWL) as-built compliance reports.

Additionally, acceptable alternative evidence could be certification to standards applying strict evidencing criteria such as the AECB CarbonLite New Build Standard, Passivhaus Classic/ Premium/ Plus and the UK Net Zero Carbon Building Standard.

Returning to the subject of Tai ar y Cyd: the collaboration is intended to deliver social housing to either the AECB CarbonLite New Build or Passivhaus standards. On the basis of the above proposals for acceptable alternative evidencing, the required and relevant energy modelling and evidence collection for certification would be in place as part of the delivery of new build social housing.

POLICY CC2 – PRESUMPTION AGAINST DEMOLITION

A total of 11 representations were made in respect of Policy CC2 – Presumption Against Demolition.

Whilst there has been some support for the principle of the policy, concerns have been raised that the policy does not go far enough and that pre-1950 buildings should be protected from demolition. Conversely, some developers have concerns that the policy is overly onerous and would have a negative impact on timescales and windfall delivery.

INDIVIDUAL COMMENTS

SUPPORT

7085 - Barratt Redrow Homes (Highlight Planning)

Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and repurposing 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.

Council Response

Support is noted.

7214 - Penarth Town Council

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

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

Council Response

Support is welcomed.

COMMENTS/OBJECTIONS

4624 - Barton - objection

Avoidable decline by demolishers should be compiled into a watchlist seeking to exploit house building targets for profit when they disregard restoring a building and repurposing it to show off to their social groups.

Suggested change

As above with protections for listed, non-designated heritage assets and unclassified buildings alike altogether.

Council response

The comment is noted. The policy intent is to protect all buildings from demolition and will only allow replacements in specific circumstances where strict criteria are adhered to.

5946 - HBF - objection

This policy should be removed, as it is likely to lead to lower-density development and reduce the level of windfalls achieved.

Council response

The policy does not prohibit demolition, nor does it presume against it in all circumstances. Rather, it seeks to ensure that decisions are based on a balanced assessment of the environmental, social and economic implications of retaining, adapting or demolishing existing buildings. Where clear evidence demonstrates that demolition and redevelopment would deliver a more sustainable whole-life outcome than retention or reuse, the policy provides an appropriate framework for such proposals to come forward.

The policy allows for demolition and redevelopment where there are significant public benefits. The supporting text for Policy CC2 provides an example that significant public benefits could include a scenario where the demolition of a small disused building could allow for large scale regeneration or affordable housing development. These types of development will still be allowed, provided that they can be demonstrated that the re-use of a building could not deliver the same benefits.

The argument that this would reduce density and reduce the number of windfalls is unsubstantiated. There are many examples across the Vale where existing underutilised buildings such as pubs have been converted successfully into flats, often at a high density. This policy would encourage this type of redevelopment in the first instance.

Many of the applications received in the Vale are for the replacement of a single dwelling with another often more modern larger dwelling on the same plot. There will be greater controls on this type of application, but as this type of application does not result in a net gain in dwellings, there will be no impact on windfall allowance.

6048/6081 - Barratt Redrow Homes (Lichfields) - objection

As drafted, Policy CC2 sets a presumption against demolition. This could have serious impacts on delivery timescales for residential sites with, for example, unused or derelict farm buildings or where a dwelling needs to be demolished for access purposes. This could have implications on the housing delivery trajectory as set out in the Council's Housing Land Supply and Housing Trajectory Evidence Paper.

Council response

The policy does not prohibit demolition, nor does it presume against it in all circumstances. Rather, it seeks to ensure that decisions are based on a balanced assessment of the environmental, social and economic implications of retaining, adapting or demolishing existing buildings. Where clear evidence demonstrates that demolition and redevelopment would deliver a more sustainable whole-life outcome than retention or reuse, the policy provides an appropriate framework for such proposals to come forward.

The policy allows for demolition and redevelopment where there are significant public benefits. The supporting text for Policy CC2 provides an example that significant public benefits could include a scenario where the demolition of a small disused building could allow for large scale regeneration or affordable housing development. These types of development will still be allowed, provided that they can be demonstrated that the re-use of a building could not deliver the same benefits.

6599 - Barton - objection

Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of the Council's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.

Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.

Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.

Council response

The comments are noted. However, it is considered that there needs to be a degree of flexibility in the policy rather than setting a blanket restriction that all pre-1950 buildings should not be demolished. The policy ensures that decisions are based on a balanced assessment of the environmental, social and economic implications of retaining, adapting or demolishing existing buildings. Where clear evidence demonstrates that demolition and redevelopment would deliver a more sustainable whole-life outcome than retention or reuse, the policy provides an appropriate framework for such proposals to come forward.

6927 - Barratt Redrow Homes (Boyer Planning) - objection

Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.

Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.

An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.

Council response

The Council disagrees that Policy CC2 is overly restrictive. The policy has been drafted to ensure that proposals involving demolition are supported by robust evidence demonstrating that all reasonable alternatives have been explored and that demolition represents the most sustainable outcome. This approach reflects national policy objectives relating to the sustainable use of resources, decarbonisation and the principles of the circular economy.

The policy does not prohibit demolition, nor does it presume against it in all circumstances. Rather, it seeks to ensure that decisions are based on a balanced assessment of the environmental, social and economic implications of retaining, adapting or demolishing existing buildings. Where clear evidence demonstrates that demolition and redevelopment would deliver a more sustainable whole-life outcome than retention or reuse, the policy provides an appropriate framework for such proposals to come forward.

The Council considers that requiring applicants to justify demolition is proportionate given the embodied carbon and resource implications associated with the loss of existing buildings. The policy is therefore intended to promote informed decision-making and sustainable development, rather than to constrain deliverability. The Council does not consider that the approach would impact on delivery timescales, as this policy alone does not require buildings to be marketed for a time period, although this is a requirement through other policies (e.g Policy CI4 or EMP4) where buildings have an extant community or commercial use.

The policy already allows for demolition and redevelopment where there are significant public benefits. The supporting text for Policy CC2 provides an example that significant public benefits could include a scenario where the demolition of a small disused building could allow for large scale regeneration or affordable housing development. This issue identified by the additional criterion suggested is therefore already encompassed within the practical application of criterion 2.

7086 - Barratt Redrow Homes (Highlight Planning)

Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The overall wording leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.

Council response

The Council disagrees that Policy CC2 is overly onerous. The policy has been drafted to ensure that proposals involving demolition are supported by robust evidence demonstrating that all reasonable alternatives have been explored and that demolition represents the most sustainable outcome. This approach reflects national policy objectives relating to the sustainable use of resources, decarbonisation and the principles of the circular economy.

The policy does not prohibit demolition, nor does it presume against it in all circumstances. Rather, it seeks to ensure that decisions are based on a balanced assessment of the environmental, social and economic implications of retaining, adapting or demolishing existing buildings. Where clear evidence demonstrates that demolition and redevelopment would deliver a more sustainable whole-life outcome than retention or reuse, the policy provides an appropriate framework for such proposals to come forward.

The Council considers that requiring applicants to justify demolition is proportionate given the embodied carbon and resource implications associated with the loss of existing buildings. The policy is therefore intended to promote informed decision-making and sustainable development, rather than to constrain deliverability.

7087 - Barratt Redrow Homes (Highlight Planning)

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.

Council response

Policy CC2 is intended to promote the retention, adaptation and re-use of existing buildings in recognition of the significant environmental benefits associated with conserving embodied carbon, reducing waste and supporting circular economy principles. The policy aligns with national policy objectives relating to decarbonisation and the sustainable management of resources.

Whilst the policy prioritises the retention and re-use of existing buildings where practicable, it does not preclude demolition in all circumstances. The policy allows for demolition where it can be satisfactorily demonstrated that retention and re-use would not be feasible or would not represent the most sustainable outcome. In this respect, the policy already provides sufficient flexibility to consider site-specific circumstances and evidence.

The Council is concerned that the suggested wording would dilute the policy's objective by placing greater emphasis on redevelopment outcomes rather than first requiring proper consideration of the opportunities for retention and reuse. Factors such as design quality, viability, land efficiency and deliverability are important planning considerations and can be assessed through the development management process. However, these factors should be balanced against the environmental benefits of retaining existing structures and reducing embodied carbon emissions.

The Council therefore considers that Policy CC2 strikes an appropriate balance between supporting the re-use of existing buildings and allowing demolition where justified by robust evidence. As such, no amendment is considered necessary.

7216 - Penarth Town Council – Comment

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

Council response

The comment is noted. The policy does allow for the replacement of a building where on a whole life cycle basis, a demolition and replacement would result in a lower net carbon than if the building were to remain. The availability of funding for retrofit is outside of the remit of the RLDP.

POLICY CC3 – RENEWABLE ENERGY LOCAL SEARCH AREAS

A total of 7 representations were made in respect of Policy CC3 – Renewable Energy Search Areas. This included 1 representation of support, 5 comments and 1 objection.

The key issues raised were about the policy wording and consultations on applications. Concerns were also raised about the suitability of specific search areas to accommodate solar farms due to area specific constraints.

STATUTORY CONSULTEE RESPONSES

5173 – Welsh Government (Planning Division) – Comment

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.

Council response

It is recognised that peatlands are considered to be an irreplaceable habitat. However, only the northern part of the North East of Ystradowen wind search area overlaps with the area identified as peatland, with a significant part of the area lying outside this constraint area.

With regards to the SINC designation, it is noted that there is again some overlap between the SINC and the search area, although there is a part of the search area that is neither affected by the SINC nor the peat designation.

Policy CC3 is clear that proposals for renewable energy generation must also comply with the criterion set out in Policy CC5 on Renewable, Low and Zero Carbon Energy Generation. Criterion 4 requires there to be no unacceptable impacts on nature conversation and also on soil conservation. Should a planning application be received for wind generation in this area, development should be directed towards to part of the site that is free from constraints.

The Welsh Government queries whether the search areas in CC3 should already be acceptable in terms of the criteria set out in Policy CC4. The criteria for defining the search areas is set out in BP15 Renewable Energy Assessment. As part of this a number of constraints were considered, including heritage and nature conservation, best and most versatile agricultural land, historic environment, transport infrastructure, topography,

proximity to existing dwellings and aviation and radar constraints. Search areas have been drawn to exclude statutory designated sites, but non-statutory wildlife sites were not excluded at the assessment stage.

This is in line with PPW paragraph 6.4.1b which states that proposals in statutory designated sites are, as a matter of principle, unacceptable and therefore must be excluded from site searches undertaken by developers.

The Renewable Energy Assessment is high level, and consequently detailed ecological surveys would be a requirement of a planning application. This may identify other habitats or species of nature conservation value that are additional constraints. It is therefore necessary to consider policy CC3 alongside the other policy requirements in Policy CC4.

6621 – South Wales Police – Secured by Design Officer – Comment

Consultation should take place with the Designing out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.

Council response

South Wales Police is a statutory consultee and will be consulted on relevant planning applications.

6649 – Natural Resources Wales – Comment

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.

Council response

The comments are noted. The search areas are large areas and, if proposals for renewable energy schemes are submitted, these will need to be supported by further ecological information. The supporting text for Policy CC3 is clear that any proposals will also need to comply with the requirements of other policies. This will include Policy SP20.

6702 – Ministry of Defence – Comment

The MOD needs to be consulted on all proposals to develop wind turbines that are 11m or greater in height to blade tip or, that have a rotor diameter of 2m or greater. This is

necessary to safeguard defence radar coverage across the UK used to manage MOD ranges, provide air traffic control and maintain UK air defence.

The MOD notes that Draft Policy CC3 assigns the renewable energy local search areas that have been defined in the deposit plan. This supports the generation of non-domestic renewable, low and zero carbon energy. The Renewable Energy assessment from 2023 identifies potential opportunity areas for renewable energy and provides a high-level assessment of wind and solar energy resource within the Vale of Glamorgan and identifies several sites, known as 'search areas' where the potential for development is greatest, and identification of 20 of the largest sites for both wind and solar.

In principle, the MOD has no objection to any renewable energy development occurring in the renewable energy local search areas that have been defined, subject to confirming that that it will be compatible with defence safeguarding requirements.

Council response

The comments are noted. The MOD is a statutory consultee on any applications within the safeguarding area that involve development exceeding the identified height thresholds. Due to aviation safeguarding constraints, relating not only to MOD St Athan/Bro Tathan but also to Cardiff Airport, it is anticipated that the majority of renewable energy schemes will comprise solar farms rather than wind farms.

7232 - Penarth Town Council - Support

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Council response

The support is noted.

INDIVIDUAL COMMENTS

4798 – Thomas - Object

Solar locations stated as East of Colwinston, North of Llysworney, North West of Llysworney

- Industrialisation of The Countryside
- Impact on Visual Amenities
- Impact on Food Security

- Impact on Colwinston and Llysworney Landscape and infrastructure
- Visual impact
- Impact on sites of importance for nature conservation being Ty Draw South of Colwinston Policy SP20 SINC id 147
- Impact of Site Special Landscape area (2) Upper and Lower Thaw Valley policies DNP1 (2)
- No DNO apparatus or Supply
- No National Grid connection or availability
- Impact on Landscape with additional poles, pylons and electrical facilities along with associated roads, fencing, security and monitoring units
- Removal and withdrawn use of BMV Agricultural land under ALC predictive map Wales grades
- Loss of Valuable Agricultural land
- Loss of Rural Character

The RLDP is therefore unsound with these proposals for this area and we urge the Inspector to re exam and reconsider these fully.

Council response

The criteria for defining the search areas is set out in BP15 Renewable Energy Assessment. As part of this a number of constraints were considered, including heritage and nature conservation, best and most versatile agricultural land, historic environment, transport infrastructure, topography, proximity to existing dwellings and aviation and radar constraints.

In respect of the specific search areas referenced in the Colwinston and Llysworney area, these do not include BMV land and SINC 147 Ty Draw is not located within the areas.

The Council acknowledges that two of the search areas include part of the Upper and Lower Thaw Special Landscape Area. While the concerns regarding the site's location within the SLA are noted, the Council would advise that the SLA are not intended to prevent development. Rather, and as set out within paragraph 6.414 of the Deposit Plan, they are intended "*to ensure that where development is acceptable careful consideration is given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected*." Paragraph 6.415 of the plan then sets out that any such development within SLAs will be required to fully consider the impact of the proposal on the SLA through the submission of a Landscape and Visual Impact Assessment (LVIA).

Many of the issues raised are detailed matters that will be addressed at planning application stage.

6336 – Leach – Comment

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.

Council response

The Solar Search Area mapping identifies a potential area for future solar development to the north of Llanmaes. The village of Llanmaes is a known flood risk area, with run-off from the surrounding fields overwhelming the local watercourse and drainage network, flooding both the public highway and properties under more extreme rainfall. The potential solar development area is located within the contributing catchment above the village, encompassing the head of a sunken track that acts as a watercourse during wetter periods and a key flow path when flooding does occur. A flood alleviation scheme was developed for the community by the Vale of Glamorgan Council, elements of which would fall within the potential solar zone, obtaining planning consent in January 2022. Unfortunately the scheme has subsequently been determined as economically unviable due to high construction costs relative to the flood damages that would potentially be avoided over the life of the scheme, and is no longer being progressed. Solar development proposals within this area must be supported by a Flood Consequence Assessment where they have the potential to alter the hydrological response in close proximity to a known flood risk area. Any such FCA should demonstrate that the proposal will not exacerbate existing flood risk to people, property, infrastructure or the environment downstream. Depending on the size and form of development the need for SAB approval may also be triggered, also requiring proper consideration of any potential offsite flood risk impacts.

POLICY CC4 – RENEWABLE, LOW AND ZERO CARBON ENERGY GENERATION

A total of 5 representations were made in respect of Policy CC4 – Renewable, Low and Zero Carbon Energy Generation. This included 1 representation of support, 3 comments and 1 objection.

The key issues raised where updated terminology on Strategic Infrastructure Projects, consultations with statutory consultees including the Police and MOD, and the landscape impact of renewable energy schemes.

STATUTORY CONSULTEE RESPONSES

5174 – Welsh Government (Planning Division) – Comment

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.

Council response

The comments are noted. The Plan will be amended to reflect the updated terminology.

Proposed change

Replace references to Developments of National Significance (DNS) with Strategic Infrastructure Projects (SIP) in paragraphs 6.344 and 6.346.

6679 – South Wales Police – Secured by Design Officer – Comment

Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.

Council response

The comments are noted. South Wales Police is a statutory consultee and will be consulted on relevant planning applications.

6703 – Ministry of Defence – Comment

Draft policy CC4 defines requirements that any development will need to demonstrate compatibility with. It is noted that specific reference to aviation safeguarding is included. However, the MOD considers it necessary that this is expanded to include specific reference

to those technical assets which facilitate aviation safety such as navigational aids. In addition, the MOD also considers it necessary that specific mention of the need to account for defence radar coverage in relation to wind energy development is specifically identified.

Some renewable energy generation infrastructure, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon the effective operation of safeguarded defence technical installations. Solar farm developments located in proximity to safeguarded navigational aids, or other types of technical sites, can impact upon their effective operation by introducing substantial areas of metallic types of surfaces that may affect transmissions.

Where turbines are erected in line of sight to defence radars, the rotating motion of their blades can degrade and cause interference to their effective operation.

Suggested Change

The MOD recommend that any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.

Council response

Policy CC4 already references aviation safeguarding as a consideration and the MOD will be a statutory consultee on relevant planning applications that fall within the aviation safeguarding zones. Whilst the matter raised by the respondent are valid considerations, it is considered that it would be overly prescriptive to include this within the policy or supporting text. As part of the consultation response on specific applications, the MOD can identify any site-specific constraints and recommendations, including whether permitted development rights would need to be removed.

7233 - Penarth Town Council - Support

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Council response

The support is noted.

INDIVIDUAL COMMENTS

COMMENTS/OBJECTIONS

5716 – Entwistle – Object

This policy is good in the main but greater weighting should be given to visual aspects as well. Many of the new solar farms within the vale are too visible from major roads and are negatively impacting on the visual aesthetics of the area. residents and visitors well being is negatively affected when whilst travelling around they vale they feel as if they are living within a giant power generation scheme.

Suggested change

The policy needs to consider visual aspects more greatly and developers of solar farms need to be held to higher standards in terms of vegetation to shield the sites from view. The sites should also be more carefully considered and be required to use topographical relief to shield the sites from public view to a greater extent.

Council response

The concern raised by the respondent is acknowledged. As detailed in paragraph 6.348, a Landscape and Visual Impact Assessment would be required to support applications where there may be landscape impacts.

POLICY CC5 – PROMOTING HEAT NETWORKS

A total of 3 representations were made in respect of Policy CC5 – Promoting Heat Networks. This included 1 representation of support and 2 comments.

The representations sought clarification on progress on a District Heat Network in Barry and consultation on heat pump placements.

STATUTORY CONSULTEE RESPONSE

5171 – Welsh Government (Planning Division) – Comment

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?

Council response

Since the Renewable Energy Assessment report (BP15A) was completed, there has been a change in circumstances as Barry Biomass plant has been decommissioned and cannot therefore form part of a district heat network.

The Council is considering other options for clean heat at the individual, shared and district level as part of the Local Area Energy Plan (LAEP). A clean heat planning tool is currently being developed by Nesta, in partnership with the Council, which will map opportunity areas and identify potential projects. As part of this project, Nesta are engaging with key stakeholders across the energy, housing, public sector and community sectors to share knowledge, explore opportunities and challenges and ensure that planned investments, network constraints, housing priorities and community perspectives and reflected in how the tool is applied in the Vale.

In addition, the Welsh Government Energy Service have conducted a feasibility study on the potential for a low-carbon heat network around Barry Hospital which would include a cluster of public sector buildings including a primary school and two secondary schools.

Work is also being carried out at the regional level by Cardiff Capital Region Local Area Energy Plan team to consider more strategic opportunities.

6620 – South Wales Police – Secured by Design Officer – Comment

Advice should be sought from the Designing out Crime Officer to ensure the safe placement of heat pump devices.

Council response

Policy CC5 relates to heat networks rather than individual heat pumps. It should be noted that as of 1st June 2026, the Welsh Government updated permitted development rights for the installation of domestic heat pumps (air source, ground source and water source) and therefore the requirement to submit a planning application for installation will only apply in specific circumstances.

7234 - Penarth Town Council - Support

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Council response

The support is noted.

POLICY CC6 – COASTAL DEFENCES AND SHORELINE MANAGEMENT

One representation of support was made in respect of Policy CC6 – Coastal Defences and Shoreline Management.

7235 - Penarth Town Council - Support

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Council response

The support is noted.

SP17 - SUSTAINABLE WASTE MANAGEMENT

A total of 3 duly made representations (1 support, 2 comments) were received in respect of Policy SP17- Sustainable Waste Management

Representations support the inclusion of non-operational mineral sites for waste management but propose that Wenvoe Quarry be specifically identified as site suited to recycling residual construction and demolition waste. Comments were provided by South Wales Police in respect of the application of Secured by Design principles and pre application consultation.

STATUTORY CONSULTEE RESPONSES

6677 - South Wales Police – Secured by Design Officer - Comment

Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.

Council Response

Comments are noted. South Wales Police is a statutory consultee and is consulted on such matters in respect of major developments.

INDIVIDUAL RESPONSES

SUPPORT

6805 - Mineral Products Association

SP17 - Sustainable Waste Management: Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.

Council Response

The support is noted.

COMMENTS/OBJECTIONS

5165 - Breedon Trading Limited - Comment

I support adding non-operational minerals sites for sustainable waste management but believe Wenvoe Quarry should be designated for handling residues from recycled Construction and Demolition Waste or imported non-recyclable materials like clays. This

would replace the closed Whitehall site in the Vale, which is no longer operational, and I note that no similar facilities remain in the Cardiff area, with the nearest, Hendy Quarry, approaching closure.

Suggested Change

Wenvoe Quarry should be designated for handling residues from recycled Construction and Demolition Waste or imported non-recyclable materials.

Council Response

The Council is of the opinion that the proposed allocation of Wenvoe Quarry as a location for recycling Construction and Demolition waste would not improve the soundness of the plan. Deposit RLDP Policy SP17 Sustainable Waste Management makes provision for the recycling of waste material with both operational and non-operational mineral working sites, whilst Policy SP18 Sustainable Provision of Minerals advocates for the use of secondary and alternative mineral resources.

WA1 - ASSESSMENT OF WASTE MANAGEMENT PROPOSALS

1 duly made representation was made in respect of Policy WA1- Assessment of Waste Management Proposals.

This representation sought additional policy wording criteria to allow consideration of waste facilities where this would result in a significant uplift in biodiversity.

5168 - Breedon Trading Limited - Comment

The Company believes a fifth category should be added, where a facility will result in a significant uplift in biodiversity that would be unlikely to be achieved by other means**.**

Council Response

The council is of the opinion that the suggested additional criteria to Policy WA1 would not improve the soundness of the plan, since the issue of biodiversity enhancement is considered elsewhere within the Deposit RLDP. Namely Policy SP20 Biodiversity and Ecosystem Resistance, which places a requirement for all new development to demonstrate how they will contribute to the maintenance and enhancement of biodiversity and the resilience and connectivity of ecosystems.

SP18 – SUSTAINABLE PROVISION OF MINERALS

10 representation was submitted in respect of SP18 – Sustainable Provision of Minerals. The representations are summarised below and full Council response to the issues is set out.

It is noted that background documents for Minerals have been made available as part of the consultation and, where relevant, the Council's response to representation makes reference to this evidence.

The key issues raised in respect of Policy SP18 are concerns regarding reliance on a 2016 base date to determine landbank reserves and aggregate provision, perceived inaccurate policy alignment with PPW regarding recycled materials and minerals infrastructure, and the lack of new allocations for mineral extraction in the Vale of Glamorgan.

SUPPORT

7117 – Seth Hill & Son Ltd (Highlight Planning)

Seth Hill & Son Ltd supports the general objective of maintaining an adequate minerals supply and managing mineral resources through a plan-led framework.

Council Response

The support is noted.

7125 – Tom Prichard (Holdings) Ltd (Highlight Planning)

The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation.

Council Response

The support is noted.

COMMENTS/OBJECTIONS

4631 – David Barton – Comment

- Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950.
- Provide reserves for authentic TA such as quarry stone for raw materials to drive down costs effectively for better style construction in-keeping with the are rather than contemporary quickly dating globalist schematics that have arisen from generic CAD Models.

Council Response

Regarding the demolition of buildings, policy CC2 of the RLDP poses a general presumption against the demolition of buildings unless certain criteria can be demonstrated. There is, however, nothing specifically for buildings constructed prior to 1950. A blanket ban on demolishing such buildings would not be appropriate and could restrict necessary regeneration. Many post-1950 buildings have high architectural or historic merit, while some pre-1950 structures hold minimal heritage value and may be completely unviable to repair or repurpose.

The Vale of Glamorgan has a surplus of mineral resources, as demonstrated in the Regional Technical Statement 2nd Review (RTS2). No new allocations for mineral extraction have therefore been proposed in the RLDP. However, this does not restrict additional mineral development in the Vale of Glamorgan.

Should proposals for new extraction or extensions come forward during the plan period, they will be assessed on their technical and environmental merits against the criteria-based mineral policies set out in the Plan, ensuring appropriate flexibility while protecting local amenity and the environment.

6807 – Mineral Products Association - Object

Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text. Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and recycled materials. It is not clear what is meant by "alternative resources". This should be replaced. Secondly, PPW "promotes the use" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW.

Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.

The Policy should be amended to read –

"2 ~~Favouring proposals which~~ Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. ~~alternative resources~~."

"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.

Council Response

To clarify, the term 'secondary and alternative resources' in Policy SP18 refers to secondary and alternative aggregates, such as industrial and mining by-products, and recycled aggregated from construction and demolition waste. The RLDP promotes these as sustainable substitutes for newly mined materials.

PPW (section 5.11) actively encourages principles of the circular economy, including in the use of aggregates. For example, paragraph 5.11.4 states "*Promoting the most appropriate material available should prevent the depletion of non-renewable resources and prevent waste arising. This will involve encouraging the use of renewable resources or those with low embodied energy and promoting the use of recycled and secondary materials where they are suitable and available. The use of locally sourced materials can lead to emissions reductions from transport and will also support aspirations to protect and enhance local distinctiveness. Whichever material is chosen it should be used to best effect by encouraging efficiency of use, where this means both using fewer resources in the first place and preventing the creation of waste which cannot be effectively reused*".

Policy SP18 uses the term "favouring proposals" rather than "promoting proposals" as this is considered to give stronger wording and a clear hierarchy for decision-making in favour of circular economy principles, recycled aggregates and sustainable resource efficiency.

The Council recognises that Planning Policy Wales (PPW paragraph 5.14.7) requires the safeguarding of both mineral resources and the broader minerals-related infrastructure necessary for their distribution and processing.

Policy SP18 provides the strategic framework for sustainable mineral supply across the authority. While detailed safeguarding of specific sites, facilities, and associated buffer zones is addressed through detailed development management policies, the Council agrees that broadening Criterion 4 to explicitly include minerals processing and handling infrastructure strengthens strategic alignment with national policy.

To ensure full consistency with PPW 5.14.7, Criterion 4 will be updated to explicitly reference minerals infrastructure alongside railheads and wharves.

Proposed Change

Amend Criterion 4 of Policy SP18 as follows:

Safeguarding **existing and planned infrastructure, including** railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, **together with wider minerals processing infrastructure.**

6808 – Mineral Products Association - Comment

Paragraph 6.373:

While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.

Add additional sentence to reflect RTS3.

Council Response

The Regional Technical Statement (RTS) is subject to a statutory five-year review cycle under national policy (MTAN 1). Consequently, over the full RLDP plan period (2021–2036), the RLDP will cover future reviews, including RTS3, RTS4, and potentially RTS5. Attempting to reference specific ongoing review schedules within the RLDP text is considered unnecessary and would make the text prematurely dated.

As mentioned in Paragraph 4.19 of Background Paper 25 (Minerals), the Statement of Sub-Regional Collaboration (SSRC) will allow for adaptability to future reviews of the RTS. "*Once agreed, an SSRC will remain in place until it becomes superseded by the requirements of future reviews of the RTS, or new information comes forward which justifies a change*".

6809 – Mineral Products Association - Comment

We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that "There is an existing landbank of 18.73 million tonnes of crushed rock" is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.

Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.

In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use. It is not clear if this tonnage is included in the 18.73mt referred too. Greater clarity and analysis is required.

Council Response

The landbank and reserve figures quoted in Strategic Policy SP18 and Background Paper 25 are directly derived from the Regional Technical Statement 2nd Review (RTS2). The RTS2 was produced by the South Wales Regional Aggregates Working Party (SWRAWP) and formally endorsed by Welsh Ministers, establishing a uniform base date of 31st December 2016 across all local planning authorities in the region.

The Minerals Background Paper (BP25) recognises the annual SWRAWP reports, specifically the 2022 report published on 3rd September 2024. Paragraph 5.9 of BP25 references this report when discussing the Vale of Glamorgan's crushed rock landbank in years.

However, the policy and supporting text of Policy SP18 in the RLDP continues to use the 2016 base date and information provided from RTS2 as this allows for allows for better statistical alignment and policy consistency. While annual SWRAWP monitoring tracks ongoing extraction, site status, and landbanks, these annual fluctuations do not alter the findings of RTS2.

The RLDP Monitoring Framework includes an indicator to monitor the aggregate landbank for the Vale of Glamorgan in years, with the target of maintaining a 10-year landbank of permitted aggregate reserves during every year of the RLDP plan period.

6810 – Mineral Products Association - Comment

Paragraph 6.374:

The slight surplus referred to was the position at 31st December 2016. The reserve figure needs to be updated.

Update the reserve figures to allow an accurate landbank to be determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

Council Response

The mineral surplus referenced in the Deposit RLDP and its supporting evidence base (Background Paper 25) is a direct quotation of the findings established in the Regional Technical Statement for Aggregates 2nd Review (RTS2). The RTS2 was prepared by the South Wales Regional Aggregates Working Party (SWRAWP) and formally endorsed by Welsh Ministers, setting a consistent baseline date of 31st December 2016 across all participating local planning authorities. The RLDP uses the 2016 baseline figures to ensure direct alignment and consistency with the endorsed RTS2 requirements.

6811 – Mineral Products Association - Comment

Paragraph 6.375:

Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that "The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process." This has not been done and as such the SSRC process adopted is fundamentally flawed.

As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

Council Response

The Minerals policies of the Deposit RLDP have been prepared using the currently endorsed regional policy framework and data available at the time of plan publication. The Council cannot prematurely base statutory policy on draft or unadopted regional targets, but continues to actively monitor the progress of emerging evidence, including the draft Regional Technical Statement 3rd Review (RTS3).

At the time of writing RTS3 has not been finalised and the RTS2 SSRC position statement is therefore the most up to date. The Council recognises the need for the evidence base to remain as up-to-date as possible and if RTS3 is finalised in advance of the Examination, an update will be provided. The SSRC Position Statement and associated minerals background papers will be reviewed and updated as necessary, incorporating the latest published RTS3 findings, updated sub-regional agreements, and relevant examination precedents from across Wales.

The Council will continue to engage with sub-regional partners and the RAWP to update the SSRC Position Statement and minerals evidence base ahead of the Submission stage to reflect the emerging RTS3 position.

7118 – Seth Hill & Son Ltd (Highlight Planning)

Objection is taken to the extent that the Deposit RLDP relies too narrowly on the RTS2 conclusion that no further allocations are specifically required.

Council Response

No new allocations for mineral extraction have been proposed in the RLDP, recognising the Regional Technical Statement's (2nd Review) (RTS2) requirements for the Vale of Glamorgan. However, the absence of new specific site allocations does not restrict mineral development in the Vale of Glamorgan.

Should proposals for new extraction or extensions come forward during the plan period, they will be assessed on their technical and environmental merits against the criteria-based mineral policies set out in the Plan, ensuring appropriate flexibility while protecting local amenity and the environment.

7126 – Tom Prichard (Holdings) Ltd (Highlight Planning)

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.

Council Response

Policy SP18 is a high-level policy addressing sustainable mineral provision and is therefore considered not to be an appropriate policy to explicitly reference Argoed Isha.

Policy MIN3 – Dormant Mineral Sites addresses the dormant reserves at Argoed Isha as "having potential to be reworked in the future" and is therefore not included to be served a Prohibition Order. Furthermore, paragraph 6.386 explicitly states that "it is considered that the reserves at Argoed Isha Quarry, Llansannor, could be reworked in the future subject to the approval of a new scheme of workings".

Table 6 of Background Paper (BP25) Minerals recognises that Argoed Isha holds limestone resources. Paragraph 5.51 continues "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required… 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".

The current wording and background evidence in Policy MIN3 is therefore considered appropriately clear in recognising that the site remains a realistic future source of limestone, subject to a new scheme of workings.

MIN 1 – DEVELOPMENT IN MINERALS SAFEGUARDING AREAS

4 duly made representations were submitted in respect of MIN (1) – Development in Minerals Safeguarding Areas. The representations are summarised below and full Council response to the issues is set out.

It is noted that background documents for Minerals have been made available as part of the consultation and, where relevant, the Council's response to representation makes reference to this evidence.

The key issues raised in respect of Policy MIN1 are requests to include policy wording on prior mineral extraction and to remove the Swn Y Coed site from the Category 1 Limestone safeguarding area due to development constraints.

SUPPORT

7121 – Seth Hill & Son Ltd (Highlight Planning)

Support is given to the safeguarding of limestone resources from unnecessary sterilisation.

Council Response

Support for the policy is noted.

7127 – Tom Prichard (Holdings) Ltd (Highlight Planning)

This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.

Council Response

Support for the policy is noted.

COMMENTS/OBJECTIONS

Rep 6812 – Mineral Products Association – Comment

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

Add a further subsection to address the principle of prior extraction.

Council Response

It is considered that the quote from PPW has been taken out of context. The quote presented implies that the extraction of mineral resources prior to development should be considered.

The full quote from PPW 5.14.7 explains the *definition and purpose of safeguarding*. It clarifies that designating a mineral safeguarding area simply means the presence and quality of the resource, along with associated environmental constraints of extraction or prior-extraction, have been considered when mapping the safeguarding areas. It is not a policy requirement in PPW that prior extraction is mandated or encouraged before non-mineral development occurs.

"S*afeguarding does not indicate an acceptance of mineral working, but that the location and quality of the mineral is known and that the environmental constraints associated with extraction, including the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered*" (PPW edition 12, paragraph 5.14.7).

The Council therefore considers there to be no reason to amend the policy as a result of this representation.

6923 – Barratt Redrow Homes (Boyer Planning) - Object

Barratt Redrow understand the need for a sustainable provision of minerals however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. The presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.

Council Response

Mineral Safeguarding Area boundaries set out on the Proposals Map are designated using the British Geological Survey (BGS) Aggregate Safeguarding Maps for Wales. These maps provide a strong indication of where high-quality mineral resources (such as Category 1 Limestone) are geologically present.

As established in Planning Policy Wales (PPW paragraph 5.14.7), the inclusion of land within a safeguarding area does not mean a presumption in favour of mineral extraction, nor does it preclude non-mineral development. Its purpose is to ensure that the presence of the mineral resource is formally acknowledged and considered in planning decisions to avoid unnecessary sterilisation.

It is therefore not considered necessary to amend the Mineral Safeguarding Areas on the basis of a candidate site being present within one. The Mineral Safeguarding Area boundaries properly reflect the national geological evidence base in accordance with Planning Policy Wales.

MIN 2 – QUARRY BUFFER ZONES

4 duly made representations were submitted in respect of MIN (2) – Quarry Buffer Zones. The representations are summarised below and full Council response to the issues is set out.

It is noted that background documents for Minerals have been made available as part of the consultation and, where relevant, the Council's response to representation makes reference to this evidence.

The key issues raised in respect of Policy MIN2 are objections to the impacts of Longlands Quarry and a request to delete criterion 2 of the policy.

SUPPORT

7122 – Seth Hill & Son Ltd (Highlight Planning)

The principle of retaining quarry buffer zones is supported because it protects existing and future quarrying operations from encroachment by incompatible development.

Council Response

The support is noted.

7128 – Tom Prichard (Holdings) Ltd (Agent: Highlight Planning)

The principle of protecting mineral operations from encroachment by incompatible development is supported.

Council Response

The support is noted.

COMMENTS/OBJECTIONS

4821 – Mr Rob G Thomas - Object

Longlands Quarry
Quarry site and quarry buffer zone
Intrusion into open countryside
Impact on visual amenities
Impact on traffic and highways
Increased noise
Increase dust
Impact on local properties
Loss of good agricultural land under ALC Wales Predictive Map and BMV land loss

Industrialisation of the countryside

Council Response

Longlands Quarry is an established, active mineral operation with an existing planning permission. The RLDP does not propose or allocate any expansion, new site boundaries, or intensification of mineral operations at Longlands Quarry. Issues such as dust, noise, traffic, and environmental amenity associated with the day-to-day operations of the site are covered by the conditions attached to its existing planning permission. The inclusion of the Buffer Zone policy does not result in the loss of agricultural land.

The designation of the Quarry Buffer Zone accords with national guidance in Planning Policy Wales and Minerals Technical Advice Note (MTAN) 1: Aggregates.

The purpose of the Quarry Buffer Zone is to prevent sensitive developments (such as new residential housing) from encroaching within close proximity (200 metres) to an existing active quarry. This protects the amenity of future occupiers while also protecting the established mineral operation from incompatible development.

6813 – Mineral Products Association – Object

Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted. Delete Subsection 2

"Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:

1 The proposal would not constrain the operations of the mineral site; or"

~~2 The proposal is located within an existing built up area which already encroaches into the buffer zone.~~"

Council Response

PPW (5.14.44) explicitly states that "*within the buffer zone there should be no new mineral extraction or new sensitive development, except where the site of the new development in relation to the mineral operation would be in a location remote from the active mineral site* ***or on the far side of an existing built up area which already encroaches into the buffer zone***".

Criterion 2 directly reflects this national policy exception. Deleting Criterion 2 would result in an overly restrictive policy that fails to accord with PPW by preventing appropriate infill or re-development opportunities within established settlement boundaries where existing development already encroaches into the buffer zone.

The Council therefore does not consider that the proposed change to the policy is necessary.

MIN 3 – DORMANT MINERAL SITES

3 duly made representations were submitted in respect of MIN (3) – Dormant Mineral Sites. The reps are summarised below and full Council response to the issues is set out.

It is noted that background documents for Minerals have been made available as part of the consultation and, where relevant, the Council's response to representation makes reference to this evidence.

The key issues raised in respect of Policy MIN3 are objections to the impacts of Longlands Quarry and concerns that the policy text does not sufficiently protect Argoed Isha's potential as a future limestone source.

SUPPORT

7129 – Tom Prichard (Holdings) Ltd (Highlight Planning)

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.

Council Response

The support is noted.

COMMENTS/OBJECTIONS

4822 – Mr Rob G Thomas - Object

Longlands Quarry
Quarry site and quarry buffer zone
Intrusion into open countryside
Impact on visual amenities
Impact on traffic and highways
Increased noise
Increase dust
Impact on local properties
Loss of good agricultural land under ALC Wales Predictive Map and BMV land loss
Industrialisation of the countryside

Council Response

Longlands Quarry is an established, active mineral operation with an existing planning permission. The RLDP does not propose or allocate any expansion, new site boundaries, or intensification of mineral operations at Longlands Quarry. Issues such as dust, noise, traffic,

and environmental amenity associated with the day-to-day operations of the site are governed by the conditions attached to its existing planning permission. The inclusion of the Dormant Mineral Sites policy does not result in the loss of agricultural land.

The purpose of the policy is to prevent further extraction at dormant mineral sites. Longlands Quarry is not a dormant mineral site and is therefore not listed in the policy as a site where further mineral extraction will be prevented.

7130 – Tom Prichard (Holdings) Ltd (Highlight Planning) – Object

Objection is taken to the absence of stronger wording recognising that the site [Argoed Isha] remains a realistic future source of limestone.

Council Response

Policy MIN3 – Dormant Mineral Sites addresses the dormant reserves at Argoed Isha as "having potential to be reworked in the future", and is therefore not included to be served a Prohibition Order. Furthermore, paragraph 6.386 explicitly states that "it is considered that the reserves at Argoed Isha Quarry, Llansannor, could be reworked in the future subject to the approval of a new scheme of workings".

Table 6 of Background Paper (BP25) Minerals recognises that Argoed Isha holds limestone resources. Paragraph 5.51 continues "*While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required… 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*".

The current wording and background evidence is therefore considered appropriately clear in recognising that the site remains a realistic future source of limestone, subject to a new scheme of workings.

MIN4 – SUSTAINABLE MINERAL WORKING

5 duly made representations were submitted in respect of MIN (4) – Sustainable Mineral Working. The representations are summarised below and full Council response to the issues is set out.

It is noted that background documents for Minerals have been made available as part of the consultation and, where relevant, the Council's response to representation makes reference to this evidence.

The key issues raised in respect of Policy MIN4 are concern that the wording on secondary and recycled aggregates has misinterpreted national planning policy, and reliance on a 2016 base date to determine landbank reserves and aggregate provision.

SUPPORT

7123 – Seth Hill & Son Ltd (Highlight Planning)

Support is given to the policy framework for new workings, extensions and continued mineral extraction subject to environmental safeguards, amenity protection and restoration.

Council Response

The support is noted.

7131 – Tom Prichard (Holdings) Ltd (Highlight Planning)

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.

Council Response

The support is noted.

COMMENTS/OBJECTIONS

6814 – Mineral Products Association - Object

This policy wording does not reflect PPW (5.11) which seeks to "promote" and not "prioritise" the use of recycled material and secondary aggregates. Further the word "only" is superfluous and should be deleted.

Reword the policy:

"Proposals which PROMOTE ~~prioritise~~ the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO ~~before new sources of~~ primary materials ~~are developed~~ will be

SUPPORTED ~~favoured~~ where this does not have an unacceptable effect on amenity or the environment. Proposals for the extraction of new primary minerals will ~~only~~ be permitted where there is a proven national, regional or local need for the mineral, and where:"

Council Response

The policy's use of the term 'prioritise' is considered to be a clear and effective reflection of the sustainable minerals hierarchy. The policy aims to encourage developers to utilise secondary and recycled aggregates in preference to primary resources as a first principle. By contrast, using the term *"promote"* (as suggested in the representation) is aspirational and passive, making it difficult to enforce as a development management test.

The policy's use of the term 'only' establishes a necessary presumption against the extraction of new primary minerals unless it is occurs where a proven national, regional or local need exists, and that it meets the listed criteria.

Furthermore, the policy's use of **"**Before new sources of" sets out a clear sequential test and hierarchy of decision-making, in line with the wording to 'prioritise' rather than 'promote'.

Policy MIN4 uses the term "favoured" rather than "supported" as this is considered to give stronger wording and a clear hierarchy for decision-making in favour of circular economy principles, recycled aggregates and sustainable resource efficiency.

6815 – Mineral Products Association - Comment

Paragraph 6.388: As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined. Update the evidence as required.

Council Response

Mineral apportionments, landbank calculations, and aggregate supply requirements for all Welsh LPAs are directed by national planning policy set out in Planning Policy Wales (PPW) and Minerals Technical Advice Note (MTAN) 1: Aggregates.

Planning Policy Wales (PPW) and Minerals Technical Advice Note (MTAN) 1: Aggregates set out the framework for LPAs in Wales regarding mineral apportionments, landbank calculations, and aggregate supply requirements. These requirements are formally established at a strategic level via the Regional Technical Statement (RTS) for Aggregates (2nd Review), produced by the South Wales Regional Aggregates Working Party (SWRAWP) and endorsed by Welsh Ministers.

The RTS 2nd Review (RTS2) sets a base date of 31st December 2016 for the national aggregate survey data. Background Paper 25 (BP25: Minerals) uses the 2016 baseline figures to ensure direct alignment and consistency with the endorsed RTS2 requirements. The data in many of the tables in BP25 is directly derived from RTS2.

The evidence base presented in BP25 is considered to appropriately reflect RTS2 and provide a sound basis for the Replacement LDP mineral policies.

6816 – Mineral Products Association - Comment

Paragraph 6.389: As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of "overprovision". Further this is a misquote of MTAN1 Paragraph 34.

Amend the text accordingly. Reword the text:

"Proposals which ~~prioritise~~ PROMOTE the use of recycled material and secondary aggregates ~~before new sources of~~ AS AN ALTERNATIVE TO primary materials ~~are developed~~ will be SUPPORTED ~~favoured~~. ~~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~~, The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified ~~(MTAN1 Paragraph 34)~~.

Council Response

It is noted that the representation appears to reference paragraph 6.389, when it should be referring to paragraph 6.390.

The evidence regarding primary mineral provision and landbank requirements is clearly established in the Regional Technical Statement (RTS 2nd Review), which forms part of the LDP evidence base (BP25: Minerals). The RTS 2nd Review (RTS2) demonstrates that the Vale of Glamorgan currently possesses sufficient permitted crushed rock reserves to satisfy its sub-regional apportionment requirement over the plan period, alongside the required statutory landbank buffer. Consequently, there is no identified need for an allocation for mineral extraction in the Vale of Glamorgan. The Vale of Glamorgan is in a position where it provides more minerals than it currently needs for the lifespan of the RLDP and permitting additional primary extraction without a proven need would represent strategic overprovision.

The assertion that the RLDP has misquoted MTAN 1 Paragraph 34 is not accepted. Paragraph 6.390 does not provide a direct quote of MTAN 1 Paragraph 34. Rather, it provides a summary of the core principles set out in the national guidance to explain the reasoned justification for the Council's policy approach. It is therefore considered appropriate to leave the supporting paragraph 6.390 unchanged.

ANNEX 8 - DISTINCTIVE AND NATURAL PLACES

This section addresses the representations made on the Distinctive and Natural Places policies in the Plan:

- SP19 Green Infrastructure
- SP20 Biodiversity and Ecosystem Resilience
- DNP1 Special Landscape Areas
- DNP2 Green Wedges
- DNP3 Glamorgan Heritage Coast
- DNP4 Historic Environment
- DNP5 Environmental Protection
- DNP6 Quiet Areas
- DNP7 Dark Skies
- DNP8 Severn Estuary Recreational Pressure

SP19 – GREEN INFRASTRUCTURE

A total of 11 duly made representations were submitted in respect of SP19 – Green Infrastructure. This includes 4 representations of support, 3 comments and 4 objections. The reps are summarised below and full Council response to the issues is set out below.

It is noted that background documents for Green Infrastructure have been made available as part of the consultation and, where relevant, the Council's response to representation makes reference to this evidence.

The key issues raised involve strengthening Policy SP19 by aligning it with national guidance and the Green Infrastructure Strategy, resolving potential conflicts between multi-functional spaces and net biodiversity benefit, integrating community food growing and flood assessments, and ensuring green infrastructure requirements remain viable for development.

STATUTORY CONSULTEE RESPONSES

5177 – Welsh Government (Planning Division)

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.

Council Response

Whilst the Council fully supports the requirement for planning applications to be accompanied by Green Infrastructure Statements, it is not considered necessary to make specific reference to this within Policy SP19, as this is already a requirement of paragraph 6.2.12 of Planning Policy Wales. Paragraph 3.11 of the Development Plans Manual explicitly states that "an LDP should not repeat national policy" and the inclusion of such a requirement within the policy would duplicate the provisions of Planning Policy Wales.

The point regarding the protection and enhancement of all Green Infrastructure assets, rather than only those deemed to be high quality, is acknowledged. The Council is therefore content to amend the wording by removing the reference to "high quality".

Proposed change

Amend the policy wording of SP19 as follows:

Development proposals will incorporate measures that protect and enhance ~~high quality~~ multi-functional green infrastructure provision.

6970 – Dwr Cymru Welsh Water

In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.

Council Response

The Council notes the support for the policy.

7031 – Natural Resources Wales

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.

Council Response

The RLDP should be read as a whole and specifically Policy SP19 on Green Infrastructure should be read alongside Policy SP20 on Biodiversity and Ecosystem Resilience and SP4 on Placemaking.

With regards to the suggested changes, it is agreed that the proposed addition to criterion 2 would be beneficial to strengthen the policy. However, as national policy does not distinguish between relative ecological value it is considered that the suggested wording, which refers to “high ecological value” should be amended to only state “ecological value”. This point has been discussed in respect of representations on SP20.

The Council supports the inclusion of the additional bullet point on the Green Infrastructure Strategy.

With regards to the suggested change to 6.397, whilst the Council is happy to include the additional text, it is not considered necessary to also be repeated under the supporting text for Policy SP4 Placemaking, as the plan should be read as a whole.

Proposed change

Amend criterion 2 of SP19:

2 Protect and enhance connectivity between existing green infrastructure assets **and be planned wherever possible to positively support areas of ecological value.**

Add an additional criterion to Policy SP19:

X Have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessments (and the assets listed therein) and the Green Infrastructure Action Plan

Add an additional sentence into paragraph 6.397:

However, multi-functional uses of space must be considered carefully so that they are not detrimental to the natural environment or the policy requirement to achieve net benefit for biodiversity

6732 – Cardiff and Vale University Health Board

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: "Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing."

Council Response

The Council recognises the contribution that community food growing spaces make toward enhancing local Green Infrastructure networks, supporting nature-based solutions and community cohesion.

Criterion 9 of Policy SP19 already establishes that development proposals must "*Support the provision of community growing spaces including allotments and community orchards*".

No changes to Policy SP19 are considered necessary in this regard, as the existing wording already addresses community food growing opportunities.

INDIVIDUAL RESPONSES

<u>SUPPORT</u>

6789 – Persimmon Homes (Boyer Planning) – Support

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

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to

remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

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

Council Response

The Council notes the support for the policy.

However, as this representation relates specifically to the suitability of Land North of Dinas Powys for housing allocation, the detailed response to this representation has been considered in the responses for HG1 KS2.

6922 - Barratt Redrow Homes (Boyer Planning) – Support

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

For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.

Council Response

The Council notes the support for the policy.

However, as this representation relates specifically to Candidate Site 437's suitability for housing allocation, the detailed response to this representation has been considered in the responses for East Vale Candidate Sites.

7200 – H Jones, L Sungur and P John (Herbert R Thomas) – Support

Provision of Green Infrastructure in residential, and all developments is supported.

Council Response

The Council notes the support for the policy.

COMMENTS/OBJECTIONS

5401 – Reed – Object

This Policy is laudable but it must be backed by proper flooding assessments of all areas before they are any more developments which could impact on existing dwellings.

Council Response

The RLDP policies and allocations are informed by a Strategic Flood Consequences Assessment (SFCA) (BP21) which was prepared by JBA Consulting in collaboration with the other South East Wales local planning authorities. This strategic assessment evaluates flood risk across the plan area in accordance with national planning guidance (TAN 15) and Natural Resources Wales (NRW) Flood Map for Planning data.

The Council has also published Background Paper BP21A: Flooding which applies site-specific flood risk evaluations to proposed allocations. Following the assessment of sites against the candidate site methodology the Council identified those sites which it considered are complimentary to RLDP Strategy. For these sites where flood risk was identified, the Council undertook Stage 2 SFCA.

The paper has been informed directly by technical feedback and review from JBA Consulting to demonstrate how proposed site allocations align with Planning Policy Wales and TAN 15.

Flooding assessments have therefore been considered thoroughly in preparing the Deposit RLDP, as the Stage 1 SFCA (BP21) assesses flood risk across all areas of the Vale, meanwhile the Stage 2 (BP21A) assesses site-specific flood risk.

Where appropriate, individual planning applications will require detailed, site-specific Flood Consequences Assessments (FCAs) and mandatory Sustainable Drainage Systems (SuDS) approval via the SuDS Approval Body (SAB) to ensure surface water and off-site flood risks are safely managed prior to construction.

5718 - Mr David Entwistle – Object

This policy needs to be stronger and in more depth. The policy is too weak and does not go far enough into addressing the loss of biodiversity and natural habitats in the vale.

Council Response

Policy SP17 should be considered alongside Policy SP20 – Biodiversity and Ecosystem Resilience, which reinforces the RLDP's biodiversity requirements.

Paragraph 6.396 explicitly states that "*this policy (SP19) should be considered alongside SP20 on Biodiversity and Ecosystem Resilience, which requires developments to provide onsite net biodiversity benefit, the protection of existing features and increased site connectivity*".

The Council has proposed to revise Policy SP20 and also introduce a new policy SPXX Natural Environment to strengthen the RLDP's stance on protecting, conserving, and enhancing the Vale of Glamorgan's natural assets. This is detailed in the response to SP20.

6165 – Ms Lucie Taylor – Comment

SF&G [Social Farms & Gardens] suggests encouragement for community food growing uses such as community gardens, orchards, informal incredible edible style spaces and community allotments. there are many types of community food growing that can contribute positively to green infrastructure and its network improvements. These are nature based solutions that gain community 'buy in' and the potential for further improvements from the ground up.

Council Response

The Council recognises the contribution that community food growing spaces make toward enhancing local Green Infrastructure networks, supporting nature-based solutions and community cohesion.

Criterion 9 of Policy SP19 already establishes that development proposals must "*Support the provision of community growing spaces including allotments and community orchards*".

No changes to Policy SP19 are considered necessary in this regard, as the existing wording already addresses community food growing opportunities.

7201– H Jones, L Sungur and P John (Herbert R Thomas) – Comment

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation. The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

Council Response

Comments specifically regarding HG4 (4) have been considered in the appropriate section for HG4 (4) Land north of West Winds Business Park, Fferm Goch.

The Council acknowledges the importance of plan deliverability and the need to ensure that policy requirements, including Green Infrastructure provision, do not undermine the overall viability of allocated sites. The site is supported by a viability assessment which demonstrates that the site is viable. This is based on a masterplan that includes green

infrastructure within the site layout and seeks to retain key features such as hedgerows where possible. Whilst noting that the details around green infrastructure provision will need to be assessed in the future at planning application stage, it is not considered that this would significantly impact on viability.

SP20 – BIODIVERSITY AND ECOSYSTEM RESILIENCE

A total of 14 duly made representations (4 support, 4 comments, 6 objections) were received in respect of Policy SP20 – Biodiversity and Ecosystem Resilience.

Detailed representations were made by statutory consultees on the wording of the policy and the need for further clarity. It is also considered that an additional strategic policy on the natural environment is required. In light of representations received amendments are proposed to wording and supporting text of Policy SP20, in addition to a new policy on the natural environment. Further comments were raised by other stakeholders who considered that the policy was too weak and should provide more detail on building dependent species and growing spaces. There was also support for the flexibility in the policy and representors considered that the approach accorded with national planning policy.

STATUTORY CONSULTEE RESPONSES

6642 – Natural Resources Wales – Object

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.

Council response

The Council recognises NRWs remit in respect of statutory designated sites. The protection of statutory designated sites has been an integral part of the site assessment process and the formulation of the policies in the RLDP. As detailed in respect of the previous representation, the Council proposes a change to the Deposit Plan Appendix 2 Infrastructure Delivery Plan to include references to statutory designated sites, both in relation to housing and employment where relevant. Employment sites are not currently referenced in the Appendix 2, but there would be merit in included an extra section on employment sites, rather than updating the Employment Background Paper (BP12A).

Appendix 7 of the RLDP provides a list of Sites of Importance for Nature Conservation (SINCs), which are locally designated sites. It is however accepted that there is no separate Appendix setting out a list of international, national or local designated sites, although the extent of the international and national designations have been shown on the RLDP constraints map and the list is referred to in the evidence base, including the ISA scoping report. For completeness, it is proposed that Appendix 7 be expanded to also provide a full list of designations that are within the Vale of Glamorgan boundary as follows:

- International - Special Areas of Conservation (SACs), Ramsar and Special Protection Areas (SPAs).
- National – Sites of Special Scientific Interest (SSSIs)
- Local - Regionally Important Geological and Geomorphological Sites (RIGs), Local Nature Reserves.

The SAC designation for the Severn Estuary is the same extent as the SPA designation. The Ramsar designation covers the same area, but also includes Sully Island. In the Deposit version of the constraints map, only the SAC area is shown but this will be amended to also show the Ramsar and SPA boundaries as separate layers. The constraints map will also be amended to include Local Nature Reserves (LNRs).

There are no National Nature Reserves (NNR) or Marine Conservation Zones (MCZ) within the Vale of Glamorgan boundary. It is noted that the Kenfig SAC, which also encompasses the Merthyr Mawr Warren NNR within Bridgend County Borough is in close proximity to the Vale of Glamorgan boundary. However, there are no proposals for new development within this area where it would be necessary to make reference to the proximity to the SAC or NNR.

Proposed change

Where sites are in proximity to a statutorily designated site, reference this in Appendix 2 and in the key site policy, where appropriate.

Include a full list of statutorily designated sites in Appendix 7

Include the Severn Estuary Ramsar and SPA on the constraints map

6643 – Natural Resources Wales

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).

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.

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 sites 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.

Council response

A definition of areas of high ecological value is proposed to be included in the supporting text for SP20.

In addition, it is proposed that Policy SP20 be amended to improve clarity and avoid repetition. As it is proposed to be clarified through the inclusion of the definition that ‘areas of high ecological value’ includes statutorily protected sites, it is not considered necessary to include separate criterion on the protection of internationally/nationally protected sites, as this is covered by national policy, which the RLDP should not repeat.

NRW have suggested that there is a need for an overarching policy on the wider protection of the natural environment which would identify 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. They have indicated that this 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.

In response to this, the Council propose to include a new strategic policy on the Natural Environment to address the points raised by the NRW. This policy will make direct reference to the Sustainable Management of Natural Resources and will also reference water resources.

A Masterplan has been prepared for each of the key sites to demonstrate the key placemaking and design principles that would apply to each site. Each high-level plan is referenced as 'indicative,' rather than being a detailed site layout. However, it does set out key parameters including which parts of the site are likely to accommodate built development and which are open space and green infrastructure corridors, which will also include areas required to achieve net biodiversity benefit.

The Masterplans have been informed by Preliminary Ecological Appraisals. The RLDP recognises that there will be a need for more detailed survey work, including in respect of protected species, at planning application stage. Should this additional survey work identify constraints, then it will be necessary to respond to this within the detailed layout. As the layout is described as 'indicative,' it is considered that there is sufficient flexibility to respond to this.

The Council have consulted with NRW on the proposed amendments to Policy SP20 and the new strategic policy. They have advised the following:

"Overall having reviewed the amendments as proposed we are satisfied these address the relevant policy concerns as raised in our response letter. We confirm:

I. We have reviewed the revised wording for Policy SP20 (Biodiversity and Ecosystem Resilience) and new Strategic Policy for the Natural Environment. We welcome the changes made and the inclusion of a separate Natural Environment policy. This policy shows 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. The policy incorporates a wider Sustainable Management of Natural Resources approach through its consideration of biodiversity, landscapes, soils, air quality, water resources and ecological connectivity.

II. We also welcome that a definition of the term areas of high ecological value is supplied. We are satisfied with the definition provided in updated paragraph 6.405. The definition appropriately captures statutory nature conservation designations, irreplaceable habitats and areas supporting national rare or protected species. This addresses our previous concern regarding the lack of clarity over the meaning of the term."

Proposed change

Amend Policy SP20 to improve clarity and avoid repetition with national policy:

Biodiversity in the Vale of Glamorgan will be protected, maintained and enhanced. All development proposals must demonstrate how they will contribute to the maintenance and enhancement of biodiversity and the resilience and connectivity of ecosystems. Proposals for new development must:

1 Avoid areas of high ecological value.

2 ~~Be accompanied by~~ **Consider whether** an ecological survey **is required. Where surveys are necessary, these must be completed in full and submitted as part of the application.** ~~and assessment of the likely impacts of the proposal on the biodiversity and ecosystem resilience of the development site. The survey and assessment to be proportionate to the nature and scale of the ecological value of the site and the nature and scale of the proposed development.~~

3 Demonstrate ~~through~~ the application of the ~~S~~**s**tep-wise approach **where developments have firstly been designed to avoid all adverse impacts. Where impacts cannot be fully avoided, they should be minimised, with mitigation to offset unavoidable impacts considered as the next step. Compensation should be seen as a last resort.** ~~that there has been an~~ **Developments will need to demonstrate an** overall net benefit for biodiversity proportionate to the nature and scale of the development.

~~4 Ensure that International and UK protected species and habitats are protected in accordance with statutory requirements.~~ Protect the integrity of non-statutory ~~locally and regionally designated sites~~ **wildlife and geological sites** ensuring that they are appropriately protected and managed.

5 ~~Incorporate existing green infrastructure at the early stages of design, that protects and enhances existing site features and~~ **Ensure that development** improves the connectivity of the ecological network.

6 Be designed to avoid the introduction or spread of invasive non-native species~~. and where necessary, include proposals to eliminate, minimise, reduce and mitigate the impacts of invasive non-native species on biodiversity and ecosystems.~~

7 Incorporate nature-based solutions within the development to support biodiversity and build ecosystem resilience within the site and the wider area.

8 Make provision for the on-going maintenance and management of existing and newly created nature conservation interests proportionate to the nature and scale of the development.

9 **Protect trees, woodlands and hedgerows. Where losses are unavoidable, compensation will be required at the replacement levels set out in national planning policy.**

Where development is considered appropriate and the on-site delivery of nature-based solutions is not feasible or sufficient, planning obligations and/or conditions will be used to secure and maintain compensatory off-site habitats and measures. ~~that are functionally related to the assets within the site and contribute to the wider local nature recovery priorities.~~

6.403 Policy SP20 Biodiversity and Ecosystem Resilience recognises the importance of the Vale of Glamorgan's natural assets and seeks to ensure that they are protected, maintained and enhanced not only for their intrinsic nature conservation value, but also for the wider social, economic and community benefits that they provide.

6.404 The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) on public authorities in Wales. This duty requires that in the exercise of their functions, public authorities in Wales must seek to maintain and enhance biodiversity by ensuring development does not cause any significant loss of habitats or populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience.

6.405 **Areas of high ecological value can be defined as:**

1. **Statutorily Protected Sites - Within the Vale, this includes Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSIs).**
2. **Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed. Within the Vale this includes ancient woodland and veteran trees, ancient hedgerows, wet woodlands, peatland, species rich grassland, long undisturbed soils, salt marsh and lowland fen.**
3. **Areas with populations of nationally rare and/or declining species or protected species where mitigation and compensation measures are either difficult to achieve or where the likelihood of success is low.**

6.406 ~~Development~~ **Applications** will ~~therefore~~ be required to demonstrate that a net benefit for biodiversity can be achieved. A net benefit for biodiversity can be achieved through a range of actions ranging from habitat creation and/or long-term management arrangements that enhance existing degraded habitats ~~or semi-natural habitats~~ and improve the resilience of ecosystems. Benefits must be long term, measurable **and** demonstrable ~~and primarily on site~~. Biodiversity enhancements should be delivered **by** following the step-wise approach of firstly avoiding **any adverse impacts**, then minimising, ~~with mitigation~~ **then mitigating**, **with compensation being considered** as a last resort for any negative impact. Where it is not possible to achieve on-site ~~mitigation~~ **compensation** and enhancement, off-site ~~compensation~~ **provision** must be provided to ensure a biodiversity net benefit. **This policy applies to all development proposals, including on non-statutorily local and regional sites such as Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs) and Regionally Important Geodiversity Sites (RIGS).**

6.407 Networks of natural habitats and green infrastructure provide a valuable ecological resource. They connect sites of biodiversity importance and provide **habitats for wildlife,** and stepping stones for the migration, dispersal and genetic exchange of species within the wider environment. To avoid fragmentation and isolation of natural habitats, it is essential that such networks are protected from inappropriate development and, where possible, enhanced. The Council's Green Infrastructure Assessment ~~identifies the green infrastructure provision within the Vale of Glamorgan and~~ contains a vision, recommendations, and action plan of how green infrastructure within the Vale can be extended and enhanced.

6.408 Sensitive design and choice of location of new development can have a positive effect on the Vale's built and natural heritage. Similarly, new development will be required to minimise its impact on natural systems **and** landscapes~~, species and habitats and where appropriate provide opportunities for the creation of new habitats or the sensitive enhancement of existing habitats. Consideration should be given to the Vale Nature Partnership's Nature Recovery Action Plan (NRAP) and any opportunities that exist to support the actions identified~~. **Applicants are advised to review the Council's Supplementary Planning Guidance on Biodiversity and Development for further information.**

6.408 Where a management plan is required, this should set out the immediate and on-going management proposals for the site **as well as** the future monitoring **and remediation** arrangements ~~and~~ **including** the funding mechanisms available to ~~meet~~ **deliver** the management plan objectives. The plan should include details of the proposed timescale for securing a net benefit for biodiversity within as short a time scale as possible.

6.409 Invasive Non-Native Species (INNS) are alien animals, plants or other organisms that can spread and cause harm to the environment, the economy and health. Development proposals must be designed and implemented to avoid the spread or introduction of INNS. ~~and where INNS are known to exist or suspected to be present on a site, planning applications must include a survey and risk assessment undertaken by a competent professional that provides details of how the INNS will be controlled, eradicated or contained both during and after construction.~~ **In addition, where a Construction Environmental Management Plan (CEMP) is required as part of a planning permission, biosecurity measures must be included as part of this.**

6.410 **Trees, woodlands and hedgerows are important components of the Vale's green infrastructure network and provide a range of ecosystem services, including carbon sequestration, habitat provision, flood mitigation, air quality improvement and landscape enhancement. Existing trees, woodlands and hedgerows must be retained and integrated into development schemes. Applicants should also consider the requirements of the Council's Supplementary Planning Guidance on Trees, Woodlands and Hedgerows and Development and the Vale of Glamorgan Tree Strategy.**

6.411 Policy SP20 is supported by SP13 Community Infrastructure and Planning Obligations and SP19 Green Infrastructure. These require new development to provide new community infrastructure including Green Infrastructure and features that support net biodiversity benefit and to incorporate Green Infrastructure respectively.

6.412 Some areas in the east of the Vale of Glamorgan lie within 300m of the Severn Estuary SPA/Ramsar, the distance within which material visual and noise disturbance impacts to qualifying birds are likely to occur. As recommended by the RLDP Habitats Regulation Assessment **(HRA)**, to minimise the potential for visual and noise disturbance, any construction works on new sites within 300m of the Severn Estuary SPA/Ramsar should be undertaken in the summer months, when qualifying populations in the site will not be present. If this cannot be timed to avoid the non-breeding season, noise impact assessments will need to be undertaken to ensure that noise levels at sensitive receptors will remain non-disturbing. Appropriate screening will be required for construction works within 300m of any established high-tide roosts or key foraging areas within or outside the SPA/Ramsar. If the prevailing habitats are deemed suitable, non-breeding bird surveys of adjoining undeveloped land parcels should be undertaken to establish whether these are functionally linked to the SPA/Ramsar and if concluded to be the case, mitigation measures should also apply to these areas. **Development proposals that could potentially have an impact on the Severn Estuary European designations should be accompanied by an HRA. This will also need to consider run-off and air quality.**

Include a new policy on the Natural Environment as follows:

SPXX Natural Environment

To protect, conserve, restore and enhance the Vale of Glamorgan's natural environment and ensure the sustainable management of natural resources, all development proposals must demonstrate that they:

1 **Protect statutorily designated sites, non-statutorily wildlife and geology sites, protected habitats, protected species and species of principal importance as well as existing biodiversity assets, including trees, woodland and hedgerows, from adverse impacts.**
2 **Safeguard important landscapes, including Special Landscape Areas and the Glamorgan Heritage Coast.**
3 **Safeguard soil resources.**
4 **Protect and improve air quality.**
5 **Protect, maintain and enhance the quality and quantity of surface water and groundwater resources through the incorporation of sustainable drainage systems (SuDS), the use of nature-based solutions where appropriate, the protection of watercourses and riparian corridors, and the provision of suitable ecological buffer zones.**
6 **Maintain and strengthen ecological networks and green infrastructure connectivity across the Vale.**

The Vale of Glamorgan contains a diverse range of natural assets that contribute significantly to the area's environmental quality, biodiversity, landscape character, climate resilience and the health and well-being of communities. These assets include internationally, nationally and locally designated nature conservation sites, protected and priority habitats and species, woodlands, trees, hedgerows, rivers, coastal environments, agricultural land and valued landscapes. Protecting and enhancing these resources is essential to achieving sustainable development and supporting the sustainable management of natural resources.

Development proposals should avoid adverse impacts on biodiversity and ecological features wherever possible through appropriate site selection, design and layout. This policy should therefore be considered alongside Policy SP20 on biodiversity and ecosystem resilience.

Trees, woodlands and hedgerows are important components of the Vale's green infrastructure network and provide a range of ecosystem services, including carbon sequestration, habitat provision, flood mitigation, air quality improvement and landscape enhancement. Existing trees, woodlands and hedgerows should be retained and integrated into development schemes wherever possible. Particular regard should be given to the protection of ancient woodland, veteran trees and other irreplaceable habitats.

The Vale's landscapes make an important contribution to local distinctiveness, biodiversity, recreation and tourism. Development proposals should also consider the specific policies on Special Landscape Areas (DNP1) and the Glamorgan Heritage Coast (DNP3).

Soils are a finite and valuable natural resource that support food production, biodiversity, water management and carbon storage. Development should minimise the loss, degradation and sealing of soils and incorporate measures to conserve and appropriately manage soil resources during both construction and operation.

Poor air quality can have significant impacts on human health, biodiversity and environmental quality. Development proposals should minimise emissions, reduce exposure to air pollution and incorporate measures that contribute towards maintaining and improving air quality.

The protection and sustainable management of water resources is critical in responding to climate change and maintaining healthy ecosystems. Development proposals should protect surface water and groundwater resources from pollution and adverse impacts and should incorporate sustainable drainage systems (SuDS) and, where appropriate, nature-based solutions to manage water quantity and quality. The protection of watercourses, riparian corridors and associated habitats through appropriate buffer zones can help improve ecological resilience, reduce flood risk and enhance biodiversity.

The maintenance and enhancement of ecological networks and green infrastructure connectivity are essential for building ecosystem resilience and enabling species movement

in response to habitat fragmentation and climate change. This policy should be considered alongside policy SP19 on Green Infrastructure.

5178 - Welsh Government (Planning Division) – Object

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.

Council Response

As detailed in the response to NRW, Policy SP20 has been substantially redrafted. With regards to criterion 1, the proposed change to the policy includes a definition of high ecological value in the supporting text. These are the sites and habitats that are referred to in paragraph 6.4.15 of PPW as follows:

"*Proposals in statutory designated sites are, as a matter of principle, unacceptable and therefore must be excluded from site searches undertaken by developers. This principle also extends to those sites containing protected species and habitats which are irreplaceable and must be safeguarded*."

Policy SP20 is clear that development in these high ecological value areas should be avoided. For other sites, as detailed in Criterion 3, the step-wise approach should be considered which would first avoid all adverse impacts. This approach adheres to Figure 13 of PPW on how to consider designated sites and uses the same terminology.

6652 – Natural Resources Wales

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).

Council response

The comments are noted. There is already a requirement in national planning policy for applications to be supported by a Green Infrastructure Statement, which should be proportionate to the scale and nature of the development.

The key sites are supported by both masterplans, informed by ecological surveys, and green infrastructure assessments (see Background Paper 32A Green Infrastructure Assessment of Key Sites).

7034 – Natural Resources Wales

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.

Council response

As detailed in the response to representation 6643, Policy SP20 and its supporting text is proposed to be amended. The amended supported text includes a definition of what is meant by high ecological value. NRW have been consulted on the proposed amendments to the Policy and have confirmed that they are satisfied with the definition.

INDIVIDUAL RESPONSES

SUPPORT

5540 – May – Support

This is very important, developments must allow and improve connectivity for species across the wider landscape wildlife corridors etc. Avoiding sensitive sites by a good buffer margin to avoid disturbance by development.

Council response

Support is noted.

6049 – Barratt Redrow Homes (Lichfields) – Support
6082 - Barratt Redrow Homes (Lichfields) – Support

Policy SP20 states that "*Where development is considered appropriate and the on-site delivery of nature-based solutions is not feasible or sufficient, planning obligations and/or conditions will be used to secure and maintain compensatory off-site habitats and measures that are functionally related to the assets within the site and contribute to the wider local nature recovery priorities*."

The proportionate approach to biodiversity mitigation and compensation, that provides allowance for planning obligations towards off-site habitat improvement and maintenance is consistent with Chapter 6 of PPW and therefore meets the first test of soundness (Does the Plan fit?). It is essential that options are retained to provide biodiversity mitigation off site as well as on site.

Council response

The support is noted. The Policy reflects national policy, requiring the consideration of the step-wise approach, which does allow for off-site compensation but only as a last resort. It should be noted that it is proposed that Policy SP20 be amended. However, the reference to off-site compensation remains part of the Policy text.

7202 – H Jones, L Sungar and P John (Herbert R Thomas) – Support

The above Policy is in accordance with Chapter 6 PPW.

The approach is supported and dovetails with SP19.

Council response

The support is noted.

COMMENTS/OBJECTIONS

5723 – Entwistle – Object

I support this in principle but feel it is too vague and weak. The council should be pushing for protection of species beyond statutory requirements and hold itself to a higher standard. There are always ways that local/on site nature based solutions can be incorporated and the statement saying off site measures can be considered is too weak and gives developers too much scope to bypass their requirements.

Council response

Following the latest update to Planning Policy Wales (Edition 12) the requirements for biodiversity are now more stringent, with developments required to demonstrate a net biodiversity benefit and the consideration of the step-wise approach where developments have firstly been designed to avoid all adverse impacts. Where impacts cannot be fully avoided, they should be minimised, with mitigation to offset unavoidable impacts considered as the next step. Compensation should be seen as a last resort. The requirements are also reflected in the local policy framework, which gives significantly more ecological protection than was previously the case.

5941 – HBF – Object

The HBF suggests that the words 'functionally related' should be removed from the bold text at the end of the policy. Although the principle of this final paragraph is supported, the flexibility which it provides to developers is, in part, removed by the wording above. It is accepted planning practice that where something can not be provided on site, an offsite alternative can be acceptable, subject to the appropriate controls. However, limiting this to 'functionally relates' is onerous and unnecessary to achieve the aims of the policy.

Council response

As detailed in the response to NRW, Policy SP20 has been amended to address comments made by statutory consultees. As part of the amendments, the term ‘functionally related’ has been removed from this section of the Policy. However, the Policy still requires proposals for new development to improve the connectivity of the ecological network. Under the step-wise approach, off site contribution must be seen as a last resort and would need demonstrate that a net benefit to biodiversity can be achieved. It is recognised that in some cases it would not be possible to achieve this on functionally linked land and therefore the removal of this requirement may result in a better outcome from a biodiversity perspective.

6140 – Priaulx – Comment

The Green Infrastructure policies are welcome but overlook building-dependent species such as bats and red-listed endangered birds such as swifts, house sparrows and house martins.

Wales does not yet have planning guidance for these species but England has guidance based on British Standard BS 42021 for Integral Nest Boxes. Therefore, please implement the equivalent of England national planning policy guidance (NPPG) Natural Environment 2025 paragraph 017, with regard to at least one swift brick per dwelling on average for new developments as these are a universal nest brick for small bird species, not included in quantitative biodiversity calculations so a separate policy is needed.

Please add, as house martins are a significant species in the Vale of Glamorgan with good availability of vegetated and waterside areas for foraging: "Artificial nest cups for house martins may be specified as an alternative to swift bricks, where recommended by a suitably qualified ecologist."

Please also add the following, to ensure effective implementation: "Post-construction stage confirmation of installation is required through photographs or verification by a suitably qualified ecologist."

Existing nest sites in buildings should be protected and retained where possible, and equivalent mitigation provided where this is not possible.

Council response

The points raised are detailed matters that would need to be considered at planning application stage having regard to the site-specific context and type of application. The Council has existing Supplementary Planning Guidance on Biodiversity and Development which include a section on bird boxes. Following the adoption of the plan, this SPG will be updated having regard to the points made in respect of swift and house martin nesting opportunities.

6175 – Taylor – Object

SF&G believe that food growing initiatives have multifaceted benefits, including contributing to the biodiversity goals under the Environment Wales Act, supporting wellbeing and net zero targets by 2035. The Vale of Glamorgan's Biodiversity Forward Plan aims to meet obligations to enhance biodiversity and ecosystem resilience. SF&G has experienced poor biodiversity provision in new school and housing developments through collaboration with KWT LPFN package delivery. Policies should ensure spaces for nature are integrated into developments. Furthermore, communities should be encouraged to include food growing sites in their Place Plans to enhance biodiversity and help address food security amidst global challenges.

Council response

The comments are acknowledged. Growing spaces are also referenced in Policy SP19 on Green Infrastructure and, as the plan should be read as a whole, it is not considered necessary to also reference this under Policy SP20.

6790 – Persimmon Homes (Boyer Planning) - Comment

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

Council response

Policy SP20 is proposed to be amended to ensure greater conformity with PPW (Edition 12). The suggested wording is identified in response to NRW representation 6643 and has been agreed by NRW. The policy specifically references proportionality in respect if the nature and scale of development.

DNP1 – SPECIAL LANDSCAPE AREAS

One representation was made in respect of the wider DNP1 policy.

7203 – Jones, Sungur and John - Comment

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

Council Response

The use of non-statutory designations to protect areas of landscape, such as Special Landscape Areas (SLAs), has long been a policy tool within the UK planning system. Such designations have been used by local planning authorities as a means of protecting sensitive landscapes and in developing an understanding and awareness of those features and characteristics that give local areas a sense of place.

A background paper on Special Landscape Areas has been prepared to support the Deposit Plan evidence base. Through this process, the Council considered that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP). However, in addition to specific changes detailed in the paper, minor consequential changes have been made to several of the SLA boundaries following a review of the existing settlement boundaries. The review sought to ensure that the settlement boundaries remain up to date and robust and reflect the existing circumstances on the ground since they were previously last assessed through the Local Development Plan. The minor changes to the settlement boundaries and the subsequent changes to the SLAs have been made to align mapped designations. The review of the settlement boundaries undertaken as a part of the RLDP is available as a separate background paper (BP46 refers).

In addition to the changes detailed above, some settlements e.g. Fferm Goch, Graig Penllyn, are fully within and covered by the SLA. In such settlements, while there may have been amendments to the identified settlement boundary, this has not affected the SLA designation in these areas.

The Council would advise that the SLAs are not intended to prevent development. Rather, and as set out within paragraph 6.414 of the Deposit Plan, they are intended *"to ensure that where development is acceptable careful consideration is given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."* Paragraph 6.415 of the plan then sets out that any such development within SLAs will be required to fully consider the impact of the proposal on the SLA through the submission of a Landscape and Visual Impact Assessment (LVIA).

Therefore, while accepting the proposed site's location within the Upper and Lower Thaw Valley SLA, the Council considers that any adverse impacts arising from the proposed development on the SLA would be adequately addressed through this mechanism and that such matters would be fully considered through the planning application stage where such matters as the scale, layout and visual integration of development can be controlled through sensitive siting, structural landscaping and screening, ensuring that the proposal responds appropriately to its rural context.

DNP1 (5) – DYFFRYN BASIN & RIDGE SLOPES

One representation was made in respect of this Special Landscape Area allocation.

6924 – Barratt Redrow Homes - Object

Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.

As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).

Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.

However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.

A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.

However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.

When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.

Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.

Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed.

Council Response

A background paper on Special Landscape Areas has been prepared to support the Deposit Plan evidence base. Through this process, the Council considered that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP). However, in addition to specific changes detailed in the paper, minor consequential changes have been made to several of the SLA boundaries following a review of the existing settlement boundaries. The review sought to ensure that the settlement boundaries remain up to date and robust and reflect the existing circumstances on the ground since they were previously last assessed through the Local Development Plan. The minor changes to the settlement boundaries and the subsequent changes to the SLAs have been made to align mapped designations. The review of the settlement boundaries undertaken as a part of the RLDP is available as a separate background paper (BP46 refers).

In addition to the changes detailed above, some settlements e.g. Fferm Goch, Graig Penllyn, are fully within and covered by the SLA. In such settlements, while there may have been amendments to the identified settlement boundary, this has not affected the SLA designation in these areas.

While the comments made are noted, the Council would advise that the SLAs are not intended to prevent development. Rather, and as set out within paragraph 6.414 of the Deposit Plan, they are intended *"to ensure that where development is acceptable careful consideration is given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."* Paragraph 6.415 of the plan then sets out that any such development within SLAs will be required to fully consider the impact of the proposal on the SLA through the submission of a Landscape and Visual Impact Assessment (LVIA).

In respect of the site that this representation relates to, the Council notes that the candidate site (ref. 437) was originally submitted during the first Call for Candidate Sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy. The proposal is in a green wedge and could harm the integrity of the designation."

At Deposit Plan, the site remains unallocated for reasons identified at Preferred Strategy stage and will remain within the Green Wedge. Development at the site has therefore not been considered acceptable and does not require assessment of the SLA.

DNP1 (6) – CWRT-YR-ALA BASIN

One representation was made in respect of this Special Landscape Area allocation.

6791 – Persimmon Homes (East Wales) - Support

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1.

Council Response

Support is noted.

DNP2 – GREEN WEDGES

A total of four representations were made in respect of the wider DNP2 policy.

SUPPORT

5433 - Moreton

Support the proposal for green wedges.

Council Response

Support is noted.

COMMENTS AND OBJECTIONS

5725 - Entwistle - Objection

The protection and boundaries of these green wedges is currently too weak and open to change too easily such as the change proposed to accommodate housing at North West Barry site. The boundary at the North West Barry site has been changed simply to allow for easier development of housing. It seems the council is caving to panic around the need for new housing. There has been no other change to the environment or urban growth of the area. This is not an acceptable reason to change the boundaries.

Suggested Change

The green wedges need greater protection and movement of the boundaries should only be considered as an absolute last resort. The boundaries and green wedges should only be moved after considerable public consultation and other avenues for development have been tried.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. The green wedge review has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales, jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly. All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

Overall, the assessment concludes that the existing green wedge designation between Barry and Rhoose remains justified. The area comprises open arable land and continues to be subject to development pressure from the expansion of nearby settlements and the employment opportunities associated with Cardiff Airport and the Bro Tathan and Cardiff Airport Enterprise Zone. However, the assessment also recognises that the need to deliver housing across the Vale of Glamorgan cannot be ignored. Consequently, it is proposed that the area allocated as Key Site HG1 KS1 Land at North West Barry for 376 dwellings in the Deposit RLDP be removed from the green wedge designation.

Furthermore, BP27 outlines in its assessment of parcel BR3 that the northeastern boundary, where the proposed key site is located, is of poor quality as it is comprised of rear garden treatments along a substandard hedgerow. It could therefore be considered that Cwm-Ciddy Lane would provide a more distinct physical boundary between allocation HG1 KS1 and the Green Wedge than the existing northeastern boundary formed by adjacent rear gardens. It is also important to note that HG1 KS1 must provide a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to both the adjoining SINC at Mill Wood and the retained green wedge as a requirement of its allocation in the RLDP.

Specific comments and concerns relating to the proposed housing allocation in Barry have been addressed in the Council's responses to representations submitted in respect of HG1 KS1 Land at North West Barry.

6188 – Taylor - Comment

Green wedges are particular opportunities to encourage food production, and this should be mentioned under this policy. We can use green wedge land and land that has high agricultural value to more specifically safeguard land for food growing – perhaps to commensurate to the level of housing growth in a region, city, town or village. The levels of housing growth referred to in the RLDP requires land outside settlements – in green wedge and other countryside locations to be protected for food production which will happen alongside the growth. Our communities face challenges like poor health, climate change, and inequality, with a fragile food system vulnerable to shocks. The Welsh Government Community Food Strategy (2025) aims to develop diverse local food networks. Supportive policies are needed for small-scale horticultural farms to enable essential infrastructure, moving away from strict scrutiny and towards recognising genuinely necessary structures for agriculture, ensuring resilient and sustainable local food businesses.

Council Response

Comments are noted. Within the areas defined by the green wedges, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

PPW separately supports the protection of agricultural land, sustainable food systems and local food production as part of its broader placemaking, climate change and rural economy objectives. These objectives are reflected in RLDP Policy SP19: Green Infrastructure. Under this policy, development proposals must meet a series of criteria designed to protect, enhance and incorporate high-quality, multifunctional green infrastructure. The policy recognises that the delivery of multifunctional green infrastructure is fundamental to creating an integrated and resilient green infrastructure network. Such provision should create cohesive spaces that enhance local food production as well as a wide range of environmental, social and economic benefits.

Consultation on the Council's Draft Green Infrastructure (GI) Strategy was undertaken alongside the Deposit Plan. The Strategy identifies food production as a component of the green infrastructure network and includes specific references to its role in delivering the strategic objectives. In particular, it supports the delivery of Objective 1 through:

"Improving access to growing spaces to support the community growing initiatives and local food production and increasing the multifunctionality of green spaces to include spaces for growing food, including on new development sites."

Furthermore, it contributes to the delivery of Objective 3 by:

"Reducing emissions associated with food and farming by supporting local food production."

Food production is therefore recognised as an asset of multifunctional GI and does not require specific reference within the Green Wedge policy.

6945 – Penarth Town Council - Support

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

Council Response

Support is noted.

DNP2 (1) - BETWEEN DINAS POWYS, PENARTH AND LLANDOUGH

A total of 3 representations were made in respect of this Green Wedge allocation.

SUPPORT

6792 – Persimmon Homes (East Wales)

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1 KS2 North of Dinas Powys.

Council Response

Support is noted.

COMMENTS AND OBJECTIONS

4681 – Griffiths - Object

Keeping all green wedge land and sticking to the proposal and not moving the goalposts to suit.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their

protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly.

All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

7019 – Lidl GB Limited - Object

Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the northeastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.

The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.

The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed

against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.

Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.

The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.

In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.

As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

For the purposes of the assessment, Land at Penlan Road, Llandough forms part of Parcel 4 of the Green Wedge between Dinas Powys, Penarth and Llandough. Each parcel was assessed individually against the assessment criteria to determine their contribution to the Green Wedge Purposes. Parcel 4 was identified as making a strong contribution to Purpose 1, preventing the coalescence of urban areas, whilst providing a moderate buffer role. Having considered the performance of each parcel against the assessment criteria, the assessment concluded that the existing Green Wedge designation should be retained. The land defined by the green wedge makes a significant contribution to preventing urban sprawl and the coalescence of the settlements of Dinas Powys, Penarth and Llandough. Furthermore, the assessment concludes that the current designation comprises robust boundaries within which the appropriate land is protected from speculative development that would impact on the objectives and purposes of a green wedge. Therefore, no land is proposed for removal from the green wedge designation except the proposed housing allocation HG1 KS2 North of Dinas Powys, Cardiff Road for 250 dwellings.

It is proposed to enlarge the green wedge boundary to the south of Llandough Hospital to realign with the revised settlement boundary. This area was previously excluded from the green wedge in the adopted Local Development Plan 2011-2026 to enable the future expansion of the hospital and is no longer required.

The full Green Wedge Assessment, including the assessment of each parcel, is set out in Background Paper 27: Green Wedges.

The Council acknowledges that the site referenced in the representation was submitted as a candidate site for housing and was considered acceptable at Preferred Strategy Stage. The justification was as follows:

“The site is located within the Llandough Settlement Boundary, which is in the Strategic Growth Area, so this is a location where sustainable growth should be targeted. The site would form a natural extension to the Llandough Settlement Boundary. It would be an incursion into the landscape to the south of the Llandough Hospital and should only be allocated if required and if less sensitive sites cannot be delivered.”

It should be noted that this justification relates to the site's suitability for housing development and not for retail.

The position at Deposit Plan acknowledges the conclusion reached at Preferred Strategy stage that the site should only be allocated if required and where less sensitive sites cannot be delivered. However, since this time, a planning application has been approved for residential development on a brownfield site within settlement limits in Llandough (Vale Car Sales) and this is deemed more preferable to meet future housing needs in the area as the site is proposed for 100% affordable housing.

Background Paper BP13 Retail and Leisure Study, prepared by Nexus, identifies a quantitative capacity for additional convenience floorspace of up to 5,862 sq m net for the Vale of Glamorgan as a whole, as reflected in Policy SP12. It is important to note that the Nexus report does not disaggregate this capacity figure by zone so there is no specific capacity identified for Zone 5 - Penarth.

The report does refer to the potential need for a medium to large sized supermarket within Penarth town centre. Paragraph 12.25 recommends the Council considers if and how the identified convenience floorspace could be accommodated with the town centre. Importantly, it does not prescribe that if the need cannot be met in the town centre, then provision should be made elsewhere in the wider Penarth area and there is no reference to Llandough being a suitable alternative location if need cannot be met in Penarth town centre itself.

Policy SP12 allocates two sites for new retail stores at Llanmaes/Llantwit Major and St Athan.

Policy SP12 is clear that the remaining convenience floorspace should be delivered through opportunities within existing town and district centres, including regeneration schemes, in accordance with the town centre first policy. This allows for a degree of flexibility to respond to opportunities that may arise during the plan period.

The Nexus report states “*any inability to accommodate the identified floorspace within the above centres, does not automatically result in the need to allocate out-of centre sites. Such an approach is unlikely to address the qualitative shortcomings of these centres and would not ordinarily improve the vitality and viability of these centres*.”

The Council has noted the submission of a new out of centre site for a potential foodstore as part of the Deposit RLDP consultation process in the wider Zone 5 area. This was accompanied by limited supporting information and did not include evidence of a sequential test to consider the availability of alternative suitable sites in Penarth. In the context of Policy requirements, it is not considered appropriate to allocate this site for additional retail provision.

The site proposed by the respondent in the Zone 5 area is not proposed to be allocated and therefore, will remain within the Green Wedge.

DNP2 (2) – NORTH WEST OF SULLY

One representation was made in respect of this Green Wedge allocation.

SUPPORT

4683 – Griffiths

Keep all existing green wedge land as proposed and no moving the goalposts as and when to suit.

Council Response

Support is noted. There has been no amendment to the Green Wedge allocation compared to the boundary in the adopted LDP.

DNP2 (3) – NORTH OF WENVOE

Two representations were made in respect of this Green Wedge allocation.

COMMENTS AND OBJECTIONS

6688 – Powells - Object

Green Wedges are typically designated where there is demonstrable development pressure and where reliance solely on settlement boundaries would not be sufficient to maintain the desired urban form. Their purpose is therefore strategic rather than absolute: they are intended to guide the form and direction of development rather than impose a blanket prohibition on all development.

The Council's own Green Wedge Background Paper (BP27) assesses the land surrounding Culverhouse Cross as part of Green Wedge MG18 (3) – North of Wenvoe. The study divides the designation into a number of parcels (NW1, NW2 and NW3) and assesses their contribution against the five Green Wedge purposes.

Importantly, the assessment demonstrates that land immediately adjoining the urban edge of Culverhouse Cross does not perform a uniformly strong Green Wedge function.

For example, Parcel NW1 – which lies adjacent to the commercial and highway infrastructure associated with Culverhouse Cross – is identified as making only a weak contribution to the purpose of preventing settlement coalescence and a weak contribution to protecting the setting of the urban area, with an overall contribution rating of Moderate.

Similarly, Parcel NW2 – which also lies adjacent to the settlement edge – is assessed as making only a moderate contribution to preventing settlement coalescence and managing urban form, while again making only a weak contribution to protecting the setting of the settlement.

The study explicitly notes that some parcels around Culverhouse Cross do not lie within a gap where coalescence between settlements would occur and therefore make only a limited contribution to that purpose.

These findings are important because they demonstrate that the Green Wedge designation in this location performs a varied and nuanced role rather than representing land of uniformly high strategic importance.

Importantly, the Green Wedge assessment itself acknowledges that the area around Culverhouse Cross experiences development pressure due to its relatively sustainable location on the western edge of Cardiff and its strong highway accessibility.

In this context, it is necessary for the development plan to strike a balance between protecting the strategic purposes of the Green Wedge and responding to identified housing needs.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

For the purposes of the assessment, Land at Culverhouse Cross forms part of Parcel 2 of the Green Wedge North of Wenvoe. Each parcel was assessed individually against the assessment criteria to determine their contribution to the Green Wedge Purposes. Parcel 2 is identified as making a moderate contribution to preventing the coalescence of settlements, managing urban form through controlled expansion of urban areas and assisting in safeguarding the countryside from encroachment and it plays a moderate buffer role. Having considered the performance of each parcel against the assessment criteria, the assessment concluded that the existing Green Wedge designation should be retained as defined in the adopted LDP. While the LANDMAP assessment was prepared some time ago, its primary recommendation for the area was to reinforce the rural character and minimise the impact of new development. The retention of a green wedge maintains a high level of protection on the land to the south of Culverhouse Cross. No change to the identified boundary are suggested as the existing boundaries are considered to utilise robust and easily identifiable features in the landscape.

The purpose of RLDP Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur.

Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

In respect of the site that this representation relates to, the Council notes that the candidate site (ref. 387) was originally submitted during the first Call for Candidate Sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that:

"The Predictive ALC Maps indicates that site is Grade 2 and 3a Best and Most Versatile Land. Development of the site would lead to the loss of BMV land contrary to national policy. The proposal is in a green wedge, development would harm the integrity of the Green Wedge designation and would represent unacceptable intrusion in to the open countryside."

The site was subsequently resubmitted through the second Call for Candidate Sites, with an amendment of proposed use from housing to affordable housing led (ref. 3836). Notwithstanding this amendment, and reduction in the number of dwellings, the reasons why the site was previously discounted at Preferred Strategy still remain.

The site proposed by the respondent is not proposed to be allocated and therefore, will remain within the Green Wedge.

6925 – Barratt Redrow Homes (Boyer Planning) - Object

Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2.

Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.

From a landscape and visual perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

For the purposes of the assessment, Land at Culverhouse Cross forms part of Parcel 2 of the Green Wedge North of Wenvoe. Each parcel was assessed individually against the assessment criteria to determine their contribution to the Green Wedge Purposes. Parcel 2 is identified as making a moderate contribution to preventing the coalescence of settlements, managing urban form through controlled expansion of urban areas and assisting in safeguarding the countryside from encroachment and it plays a moderate buffer role. Having considered the performance of each parcel against the assessment criteria, the assessment concluded that the existing Green Wedge designation should be retained as defined in the adopted LDP. While the LANDMAP assessment was prepared some time ago, its primary recommendation for the area was to reinforce the rural character and minimise the impact of new development. The retention of a green wedge maintains a high level of protection on the land to the south of Culverhouse Cross. No change to the identified boundary are suggested as the existing boundaries are considered to utilise robust and easily identifiable features in the landscape.

The Green Wedge Assessment references the two candidate site submissions for residential development as part of its consideration of development pressure within Parcel 2. However, it notes that both sites were discounted through the Candidate Site Assessment process. A Green Wedge designation will only be adjusted where land is not considered necessary to keep open in the longer term or where sites have been identified suitable, available and achievable through the candidate site process, and allocated for development. Accordingly, the assessment of the site's suitability for development is more appropriately addressed within the Candidate Site Assessment paper rather than the Green Wedge Assessment.

In respect of the site that this representation relates to, the Council notes that the candidate site (ref. 437) was originally submitted during the first Call for Candidate Sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy. The proposal is in a green wedge and could harm the integrity of the designation."

At Deposit Plan, the site remains unallocated for reasons identified at Preferred Strategy stage and therefore, will remain within the Green Wedge.

DNP2 (4) – BETWEEN BARRY AND RHOOSE

A total of 8 representations were made in respect of this Green Wedge allocation.

SUPPORT

5808 – Hart

I strongly support the maintenance of the green wedge between Barry and Rhoose. This avoids urban coalescence and is crucial to the local biodiversity and identity of the two places.

Council Response

Support is noted.

COMMENTS AND OBJECTIONS

4682 – Griffiths Object

All green wedge land to be kept as proposed and no moving of goalposts as and when to suit.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly. All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

5402 – Reed - Object

Weycock Cross and land around Model Farm should be included in the Green Wedge to prevent coalition of the village of Rhoose and Barry.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised

methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly. All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

Overall, the assessment concludes that the existing green wedge designation between Barry and Rhoose remains justified. The area comprises open arable land and continues to be subject to development pressure from the expansion of nearby settlements and the employment opportunities associated with Cardiff Airport and the Bro Tathan and Cardiff Airport Enterprise Zone. However, the assessment also recognises that the need to deliver housing across the Vale of Glamorgan cannot be ignored. Consequently, it is proposed that the area allocated as Key Site HG1 KS1 Land at North West Barry for 376 dwellings in the Deposit RLDP be removed from the green wedge designation.

Furthermore, BP27 outlines in its assessment of parcel BR3 that the northeastern boundary, where the proposed key site is located, is of poor quality as it is comprised of rear garden treatments along a substandard hedgerow. It could therefore be considered that Cwm-Ciddy Lane would provide a more distinct physical boundary between allocation HG1 KS1 and the Green Wedge than the existing northeastern boundary formed by adjacent rear gardens. It is also important to note that HG1 KS1 must provide a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to both the adjoining SINC at Mill Wood and the retained green wedge as a requirement of its allocation in the RLDP.

Specific comments and concerns relating to the proposed housing allocation in Barry have been addressed in the Council's responses to representations submitted in respect of HG1 KS1 Land at North West Barry.

Land south of Port Road (Model Farm), Rhoose is allocated as a Major Employment Allocation under RLDP Policy SP14 *Employment Growth*. It is current subject to an appeal for non-determination of an outline planning application for a B1, B2, B8 use. If the appeal is allowed, the site is anticipated to deliver 1.7 million sq. ft of Class B1, B2 and B8 offices, light industrial and warehousing and distribution units, alongside car parking, landscaping, drainage infrastructure and biodiversity enhancement works which include land for expansion of Porthkerry Country Park to the south.

Although the Council notes that the outcome of the application remains unknown, the assessment of the green wedge between Barry and Rhoose does not consider that any additional land should be included within the designation as it comprises robust boundaries within which the appropriate land is protected from speculative development that would impact on the objectives and purposes of a green wedge. The Model Farm site was excluded from the Green Wedge through the adopted LDP process, and the current assessment confirms that the existing boundary remains appropriate, with the exception of the allocation at North West Barry.

5438 – Evans - Object

This should be maintained as is. It should not be infringed by development near Weycock cross or at Model Farm which is proposed on other parts of the plan.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly. All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

Overall, the assessment concludes that the existing green wedge designation between Barry and Rhoose remains justified. The area comprises open arable land and continues to be subject to development pressure from the expansion of nearby settlements and the

employment opportunities associated with Cardiff Airport and the Bro Tathan and Cardiff Airport Enterprise Zone. However, the assessment also recognises that the need to deliver housing across the Vale of Glamorgan cannot be ignored. Consequently, it is proposed that the area allocated as Key Site HG1 KS1 Land at North West Barry for 376 dwellings in the Deposit RLDP be removed from the green wedge designation.

Furthermore, BP27 outlines in its assessment of parcel BR3 that the northeastern boundary, where the proposed key site is located, is of poor quality as it is comprised of rear garden treatments along a substandard hedgerow. It could therefore be considered that Cwm-Ciddy Lane would provide a more distinct physical boundary between allocation HG1 KS1 and the Green Wedge than the existing northeastern boundary formed by adjacent rear gardens. It is also important to note that HG1 KS1 must provide a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to both the adjoining SINC at Mill Wood and the retained green wedge as a requirement of its allocation in the RLDP.

Specific comments and concerns relating to the proposed housing allocation in Barry have been addressed in the Council's responses to representations submitted in respect of HG1 KS1 *Land at North West Barry.*

Land south of Port Road (Model Farm), Rhoose is allocated as a Major Employment Allocation under RLDP Policy SP14 *Employment Growth*. It is current subject to an appeal for non-determination of an outline planning application for a B1, B2, B8 use. If the appeal is allowed, the site is anticipated to deliver 1.7 million sq. ft of Class B1, B2 and B8 offices, light industrial and warehousing and distribution units, alongside car parking, landscaping, drainage infrastructure and biodiversity enhancement works which include land for expansion of Porthkerry Country Park to the south.

Although the Council notes that the outcome of the application remains unknown, the assessment of the green wedge between Barry and Rhoose does not consider that any additional land should be included within the designation as it comprises robust boundaries within which the appropriate land is protected from speculative development that would impact on the objectives and purposes of a green wedge. The Model Farm site was excluded from the Green Wedge through the adopted LDP process, and the current assessment confirms that the existing boundary remains appropriate, with the exception of the allocation at North West Barry.

5727 – Entwistle - Object

The boundary of the green wedge has been changed here for this proposed LDP. It seems the council is caving to pressure and panic in order to develop new housing and altering boundaries and seeking to develop into green wedges as an easy solution. This is not acceptable. These boundaries such as surrounding the proposed North West Barry housing development site are being moved against the majority wishes of Vale residents.

Suggested change

Boundary and green wedge movements should only be an absolute last resort. Stronger protections should be in place for them and movement/development should only be

allowed to occur after all other avenues have been exhausted and considerable public consultation. Development of new housing cannot be at the expense of green wedges and green space. A clause preventing an ultimate growth at all costs policy should be in place.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include

only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly. All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

Overall, the assessment concludes that the existing green wedge designation between Barry and Rhoose remains justified. The area comprises open arable land and continues to be subject to development pressure from the expansion of nearby settlements and the employment opportunities associated with Cardiff Airport and the Bro Tathan and Cardiff Airport Enterprise Zone. However, the assessment also recognises that the need to deliver housing across the Vale of Glamorgan cannot be ignored. Consequently, it is proposed that the area allocated as Key Site HG1 KS1 Land at North West Barry for 376 dwellings in the Deposit RLDP be removed from the green wedge designation.

Furthermore, BP27 outlines in its assessment of parcel BR3 that the northeastern boundary, where the proposed key site is located, is of poor quality as it is comprised of rear garden treatments along a substandard hedgerow. It could therefore be considered that Cwm-Ciddy Lane would provide a more distinct physical boundary between allocation HG1 KS1 and the Green Wedge than the existing northeastern boundary formed by adjacent rear gardens. It is also important to note that HG1 KS1 must provide a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to both the adjoining SINC at Mill Wood and the retained green wedge as a requirement of its allocation in the RLDP.

Specific comments and concerns relating to the proposed housing allocation in Barry have been addressed in the Council's responses to representations submitted in respect of HG1 KS1 Land at North West Barry.

5937 – Hart - Object

There is already a green wedge but the council has decided to develop it, which means they are worthless.

Suggested change

Green Wedges should be permanent and all developments should be made around them.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed

regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly. All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

Overall, the assessment concludes that the existing green wedge designation between Barry and Rhoose remains justified. The area comprises open arable land and continues to be

subject to development pressure from the expansion of nearby settlements and the employment opportunities associated with Cardiff Airport and the Bro Tathan and Cardiff Airport Enterprise Zone. However, the assessment also recognises that the need to deliver housing across the Vale of Glamorgan cannot be ignored. Consequently, it is proposed that the area allocated as Key Site HG1 KS1 Land at North West Barry for 376 dwellings in the Deposit RLDP be removed from the green wedge designation.

Furthermore, BP27 outlines in its assessment of parcel BR3 that the northeastern boundary, where the proposed key site is located, is of poor quality as it is comprised of rear garden treatments along a substandard hedgerow. It could therefore be considered that Cwm-Ciddy Lane would provide a more distinct physical boundary between allocation HG1 KS1 and the Green Wedge than the existing northeastern boundary formed by adjacent rear gardens. It is also important to note that HG1 KS1 must provide a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to both the adjoining SINC at Mill Wood and the retained green wedge as a requirement of its allocation in the RLDP.

Specific comments and concerns relating to the proposed housing allocation in Barry have been addressed in the Council's responses to representations submitted in respect of HG1 KS1 Land at North West Barry.

6120 – Cooper - Object

The Technical Briefing Note misinterprets PPW by reducing green wedge policy to a distance test. The 2015 Inspector found this land integral to openness and separation. The site remains visually exposed, contributes to the rural setting of Barry and forms part of a continuous landscape corridor. The case for moving the GW boundary is weak and would set a damaging precedent.

Suggested change

The plan should be scrapped altogether.

Council Response

National Planning Policy set out in Planning Policy Wales (Edition 12) (February 2024) (PPW) contains no specific assessment methodology for identifying, defining or reviewing green wedge designations in Wales. PPW does however state that green wedge designations should be proposed and be subject to review as a part of the LDP process.

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly. All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

Overall, the assessment concludes that the existing green wedge designation between Barry and Rhoose remains justified. The area comprises open arable land and continues to be subject to development pressure from the expansion of nearby settlements and the employment opportunities associated with Cardiff Airport and the Bro Tathan and Cardiff Airport Enterprise Zone. However, the assessment also recognises that the need to deliver

housing across the Vale of Glamorgan cannot be ignored. Consequently, it is proposed that the area allocated as Key Site HG1 KS1 Land at North West Barry for 376 dwellings in the Deposit RLDP be removed from the green wedge designation.

Furthermore, BP27 outlines in its assessment of parcel BR3 that the northeastern boundary, where the proposed key site is located, is of poor quality as it is comprised of rear garden treatments along a substandard hedgerow. It could therefore be considered that Cwm-Ciddy Lane would provide a more distinct physical boundary between allocation HG1 KS1 and the Green Wedge than the existing northeastern boundary formed by adjacent rear gardens. It is also important to note that HG1 KS1 must provide a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to both the adjoining SINC at Mill Wood and the retained green wedge as a requirement of its allocation in the RLDP.

Specific comments and concerns relating to the proposed housing allocation in Barry have been addressed in the Council's responses to representations submitted in respect of HG1 KS1 Land at North West Barry.

6148 – Williams - Comment

The proposed development of the land to the South of Port Road West (Model Farm) reduces the 'green wedge' between Rhoose and Barry, in addition to reducing land available for wildlife and biodiversity. I note that, in document BP27, reference to 'amending the boundary', should it be required, when considering the proposed housing development in North West Barry and it remains to be seen how large or small the 'green wedge' will end up being and how, in effect, Barry will merge into Rhoose when more developments will be proposed in the future.

Suggested change

I think that Planning permission for the development of Model Farm should not be granted.

Council Response

In preparation of the Deposit RLDP, the Council has undertaken a comprehensive review of green wedge designations in the Vale of Glamorgan. Green Wedges are a locally derived designation created through the plan process and do not carry statutory protection in the same way green belts do. They are therefore plan specific and subject to review during the preparation of a replacement plan. This has been undertaken in accordance with the agreed regional methodology for the designation of green wedges and consulted appropriately as part of the Deposit Plan consultation. The proposed Green Wedge boundaries, including the suggested amendments, were published as part of the consultation and remain available for viewing on the Proposals Map.

In the absence of any defined guidance at a national level as to how Green Wedge assessments should be undertaken, a consortium of the ten local planning authorities within South East Wales jointly commissioned LUC consultants to develop a standardised methodology for the identification and justification of Green Wedges in future Local Development Plans (LDPs) within the region.

The methodology is broken down into four stages, each with one or more steps. Working through the steps, the process seeks to identify those areas that justify the protection provided by a green wedge designation. The four stages of the green wedge assessment are:

- A – Assessment of openness.
- B – Assessment of development pressure.
- C – Assessment of performance in relation to green wedge purposes; and
- D – Conclusion of the need and definition of the boundaries.

Although other local authorities involved in the South East Wales Green Wedge Definition Criteria determined that green wedge designations were no longer required within their development plans, the Council's assessment identified a continued need for their protection within the Vale of Glamorgan. The RLDP therefore includes a policy on Green Wedges.

The purpose of Policy DNP2 is to protect the six green wedges identified through the assessment process to prevent coalescence of settlements and retain the openness of the land. Within these areas, development which prejudices the open nature of the land will therefore not be permitted. Specifically, there will be a presumption against inappropriate development which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses.

The Council is required to identify sufficient land to meet its assessed housing need over the plan period as well as provide land allocation for affordable housing. Through the stages of assessment outlined above, green wedge boundaries should be chosen carefully to include only that land which it is necessary to keep open in the longer term. Therefore, where sites have been identified suitable, available and achievable through the candidate site process, they can be allocated for development and green wedge designation adjusted accordingly. All new allocations within the Deposit RLDP have been subject to the Council's site assessment set out in BP18A and if applicable, considered as part of the green wedge assessment which is set out in BP27. Green wedges have not been disregarded, rather, the process has involved a considered assessment of whether individual areas of land will continue to fulfil the purpose and function of a green wedge throughout the plan period.

Overall, the assessment concludes that the existing green wedge designation between Barry and Rhoose remains justified. The area comprises open arable land and continues to be subject to development pressure from the expansion of nearby settlements and the employment opportunities associated with Cardiff Airport and the Bro Tathan and Cardiff Airport Enterprise Zone. However, the assessment also recognises that the need to deliver housing across the Vale of Glamorgan cannot be ignored. Consequently, it is proposed that the area allocated as Key Site HG1 KS1 Land at North West Barry for 376 dwellings in the Deposit RLDP be removed from the green wedge designation.

Furthermore, BP27 outlines in its assessment of parcel BR3 that the northeastern boundary, where the proposed key site is located, is of poor quality as it is comprised of rear garden

treatments along a substandard hedgerow. It could therefore be considered that Cwm-Ciddy Lane would provide a more distinct physical boundary between allocation HG1 KS1 and the Green Wedge than the existing northeastern boundary formed by adjacent rear gardens. It is also important to note that HG1 KS1 must provide a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to both the adjoining SINC at Mill Wood and the retained green wedge as a requirement of its allocation in the RLDP.

Specific comments and concerns relating to the proposed housing allocation in Barry have been addressed in the Council's responses to representations submitted in respect of HG1 KS1 Land at North West Barry.

Land south of Port Road (Model Farm), Rhoose is allocated as a Major Employment Allocation under RLDP Policy SP14 *Employment Growth*. It is current subject to an appeal for non-determination of an outline planning application for a B1, B2, B8 use. If the appeal is allowed, the site is anticipated to deliver 1.7 million sq. ft of Class B1, B2 and B8 offices, light industrial and warehousing and distribution units, alongside car parking, landscaping, drainage infrastructure and biodiversity enhancement works which include land for expansion of Porthkerry Country Park to the south.

Although the Council notes that the outcome of the application remains unknown, the assessment of the green wedge between Barry and Rhoose does not consider that any additional land should be included within the designation as it comprises robust boundaries within which the appropriate land is protected from speculative development that would impact on the objectives and purposes of a green wedge. The Model Farm site was excluded from the Green Wedge through the adopted LDP process, and the current assessment confirms that the existing boundary remains appropriate, with the exception of the allocation at North West Barry.

DNP2 (6) - BETWEEN LLANWIT MAJOR AND LLANMAES

SUPPORT

5655 - McGreevy

1. Protection from intrusions into the countryside.
2. Protects against the visual and physical coalescence of Llantwit Major and Llanmaes.
3. Protects the setting of the Llanmaes Conservation Area as per the adopted Management Plan.

Council Response

Support is noted.

4892 – Green

I support the allocation of this area of land to a green wedge in order to protect the rural settlement of Llanmaes from development and coalescence with the town of Llantwit Major. Clarifying the status of this land will prevent future costly battles over development of all or part of it for retail or housing and ensure Welsh planning policy with regards open

countryside, protection of conservation areas, avoiding the merger of town and village and respecting the strategic growth area are upheld.

Council Response

Support is noted.

5154 – Drye

It is imperative that a green wedge is created between the Llanmaes and Llantwit Major to prevent physical coalescence of the village and the town. It is vitally important to protect the conservation area from unwanted and damaging development in the very heart of the Vale of Glamorgan.

Council Response

Support is noted.

5256 – Llantwit Major Town Council

We note the land between Llantwit Major and Llanmaes should serve as a green wedge and the provision of retail floorspace, both of which are appropriate.

Council Response

Support is noted.

5334 – Green

This Green Wedge is critical in supporting the Welsh Government planning policies around NOT coalescing Towns and Villages. This green wedge is essential in providing that separate from Llantwit Major Town and Llanmaes Village. I fully support this green wedge proposal.

Council Response

Support is noted.

5355 – Garvey

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 Llanmaes safe from development, as per the adopted Management plan.

Council Response

Support is noted.

5380 – Meredith

I support this proposal DNP2[6] for the following reasons:

Protection from intrusions into the countryside

Protects against the visual and physical coalescence between a village and a town.

Protects the setting of the Llanmaes Conservation Area as per the Management Plan.

Council Response

Support is noted.

5428 – Watts

This land gives a green space between Llantwit Major and Llanmaes. If this green wedge is not kept, Llanmaes Village will become part of Llantwit Major town.

Council Response

Support is noted.

5432 – Moreton

Support this proposal to keep Llanmaes a conservation area, which is separate from Llantwit Major.

Council Response

Support is noted.

5463 – Tandy

I support the proposal that the land between the village of Llanmaes and the Llantwit Major bypass be designated as a Green Wedge and protected from development. This will avoid degradation of the countryside and help to preserve the village character of Llanmaes and its Conservation Area.

Council Response

Support is noted.

5577 – Hall

The allocation of this area as a green wedge will ensure that the village of Llanmaes remains separate from Llantwit Major supporting the principle of non-coalescence.

Council Response

Support is noted.

5601 – Moreton

Importance of protecting our countryside and separation of towns and villages.

Protects further development on green rural land.

Council Response

Support is noted.

5639 – Massey

I strongly SUPPORT the proposal of this green wedge as this will protect against the visual and physical coalescence of the Town of Llantwit Major crossing the B4265 bypass road and creeping towards the Conservation Area of Llanmaes Village.

Council Response

Support is noted.

5679 – McGreevy

I SUPPORT the proposal that the land between Llanmaes village and Llantwit Major be designated as a Green Wedge and protected from development for the following reasons:

1) It will provide protection from intrusions into the countryside.

2) It will protect against the visual and physical coalescence of Llantwit Major and Llanmaes.

3) It will protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.

Council Response

Support is noted.

5683 – Lewis

I am writing to state that I whole-heartedly support the above referenced proposal for the Green Wedge.

This wedge effectively separates Llantwit Major and Llanmaes in accordance with existing Planning Rules, preventing coalescence of Town and Village, protecting the existing Llanmaes Conservation Area and preventing an already busy junction from becoming a dangerous one.

Council Response

Support is noted.

5690 – Barnaby

Totally in support of green wedges in particular the proposed new area at Llantwit Major/Llanmaes LM1 much of this site is a low valley sloping down to Llanmaes brook which is a rich and diverse wildlife corridor proven during many surveys to contain Otters amongst many others. Any development in this area would cause a coalescence of the settlements.

I am also in support of B1 Boverton being classed a green wedge.

Council Response

Support is noted.

5731 – Smith

l strongly support this allocation within the RLDP Deposit Plan. This designation protects this area of open countryside against intrusions from the urban form. It also protects against the visual and physical coalescence of the Town of Llantwit Major and the Village of Llanmaes and protects the setting of the Llanmaes Conservation Area consistent with its adopted Management Plan. Development pressure on this strip of green space is significant as evidenced by the various housing, mixed and retail proposals made to date as part of the RLDP process. Having studied the background papers on the allocation of Green Wedges throughout the Vale of Glamorgan I note that this area scores the highest of all the Green Wedges across the county, including the five existing ones, as recorded in RLDP Background Paper 27 and tested against the Welsh Government's five purposes for designation of a Green Wedge. I am most grateful to the RLDP team for their positive evaluation of this site for this classification. I also note the adjustments made to the area covered by the Green Wedge between that originally proposed by and that in the Deposit Plan and with the exception of the tentative retail designation of the Bridge House Farm parcel have no objections to these.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

5737 – Green

The granting of a green wedge in this open countryside between Llanmaes and Llantwit Major will help prevent ongoing development proposals which, if granted, would contradict Welsh planning policy and result in not only the loss of open countryside but the joining of town and village (which will fall under two separate boundaries with regards local council), impact the conservation area result in ongoing pressure for further retail development along this strip of land. The criteria appear well met in order to support this proposal.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

5751 – Wright

I support this proposal in the hope the land will be protected from future development. It will offer protection from intrusions into the countryside, it will also protect against the visual and physical coalescence of a town and village, it will protect the setting of the Llanmaes Conservation area as per the adopted management plan.

Council Response

Support is noted.

5767 – Stevens

I would like to express my support for the proposal to designate the land between the Village of Llanmaes and the Llantwit Major Bypass as a Green Wedge. Maintaining this land as protected open space is important in order to:

- Prevent the visual and physical coalescence of Llantwit Major and Llanmaes

- Protect the rural setting and landscape character of the area

- Preserve the setting of the Llanmaes Conservation Area

- Safeguard countryside from incremental development pressures

Designating this land as a Green Wedge is a sensible and a necessary planning measure to ensure the long-term separation and identity of the two settlements and to maintain the character of the surrounding countryside.

Council Response

Support is noted.

5778 – Stevens

I support the designation of the Green Wedge between Llanmaes and Llantwit Major (Site ID 436 – Proposal DNP2(6)). Protecting this land is important to prevent the visual and physical

coalescence of the two settlements, maintain the rural character of the area, and preserve the setting of the Llanmaes Conservation Area.

Council Response

Support is noted.

5782 – Kirkham

A green wedge between Llantwit Major and Llanmaes is of the utmost importance. It would prevent unsuitable development, like the disputed Lidl supermarket proposal, if it was strictly adhered to by councillors as well as officers, who have done their best to protect Llanmaes from opportunistic decisions by ill informed elected members.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

5787 – Kirkham

Please see my earlier comment. Green wedge between Llantwit Major and Llanmaes absolutely essential as is education for elected members to prevent them riding roughshod over council policies in a shift attempt to curry favour with certain Llantwit Major residents.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

5828 – Massey

I fully support the proposal of the green wedge North of the B4265 as this will protect against the visual and physical coalescence of the Town of Llantwit Major merging over the bypass road and creeping towards the protected Conservation Area of Llanmaes Village.

Council Response

Support is noted.

5924 – Smith

I strongly support this designation as it will

a) protect the visual and physical separation of urban town and rural village,

b) avoid further loss of rural open landscape and agricultural amenity as it is currently under pressure from proposals to

build a retail site on the land,

c) protect the biodiversity of the area within and beyond this parcel of land.

This wedge identification scores a maximum for green wedge criteria as outlined by the Welsh Government. I support all appropriate aspects of the boundaries assigned by the RLDP except for the tentative retail site.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

5938 – Tandy

Conservation/Green Wedge Site ID 436. Proposal Number DNP2(6)

I fully support the adoption of this site as a green wedge between Llantwit and Llanmaes, in order to protect this area of rural land against urban encroachment and to prevent coalescence between the town of Llantwit ad the village of Llanmaes.

Council Response

Support is noted.

5947 – Harris

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.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

5951 – Cobourne

I support the proposal for a green wedge conservation area protecting it from development.

Council Response

Support is noted.

5991 – Leach

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.

Council Response

Support is noted.

6064 – Taylor

It is important to support villages and towns with the correct level of development. Green Wedges will help protect their identities and give protection to where development should not occur.

Council Response

Support is noted.

6070 – Jack

I support Proposal Number ID 436 Number DNP2 (6), for the Conservation /Green Wedge to prevent the coalescence of Llanmaes and Llantwit Major and hence preserve the unique village amenity of the Llanmaes setting which is enjoyed by residents of both locations and the many walkers, runners and cyclists who daily frequent the village and adjoining countryside.

Council Response

Support is noted.

6100 – Hughes

All of the land between the village of Llanmaes and the Llantwit Major by-pass should be dedicated to a Green Wedge and thus exempted from any development. It is important to resist a coalescence between town and village. Any single development would undermine the principle of countryside protection and provide a precedent for further intrusions. The Llanmaes Conservation area should be protected. I understand that, at present, the site of the proposed retail development is unprotected, pending the outcome of the Inquiry. Granting permission for the store to be developed would undermine, render pointless the idea of coalescence-avoidance and countryside protection.

Council Response

Comments are noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

The Llanmaes Conservation Area continues to be protected under the RLDP. However, as this parcel of land lies outside the designated Conservation Area, it is not afforded protected under that designation.

6130 – Barnaby

I have already commented on this site under the ‘green wedge’ proposal which I support.

Council Response

Support is noted.

6200 – Arnold

I believe that this proposal is necessary to ensure that there is not 'urban creep' of Llantwit Major into the rural vale.

Llanmaes is a separate community and whilst currently part of the Llantwit Major electoral organisation will not be in the future. Llanmaes is a rural community with agricultural traffic and regular horse movements through the village and joining onto Llantwit Major would have a significant detrimental effect on the village. This green wedge would protect the setting of the Llanmaes Conservation Area.

Council Response

Support is noted.

6224 – Arnold

I support this proposal because I don't want Llanmaes and Llantwit Major to become one amorphous mass. Llanmaes is a rural village and should be kept that way. It also protects the Llanmaes conservation area.

Council Response

Support is noted.

6256 – Harris

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.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

6266 – Pocock

In order to preserve the conservation status of Llanmaes as a small rural village community with agriculture as its mainstay, including a Church dating back to 1234, ancient ruins, listed dwellings, the setting up of this Green Wedge is essential. It will also ensure there is no risk of coalescence betwee Llanmaes and the nearby small town of Llantwit Major.

Llanmaes is a small, but thriving community accessed from Siggingston, St Mary Church, St Athan, Eglwys Brewis, and indeed Llantwit Major by a network of narrow unclassed lanes. These are enjoyed by walkers, horse riders, cyclists and of course shared by motor vehicles, including numerous working agricultural traffic. The proposed Green Wedge would serve to conserve this village as part of a network of small villages, which it is important to preserve, and is of particular relevance as Llanmaes will form part of a group of villages as part of the Boundary Commission's recommended changes.

Council Response

Support is noted.

6291 – Turner

The land between the Village of Llanmaes and the Llantwit Major Bypass should be designated as Green Wedge, us villages don’t won’t Llantwit Major joining our village.

Protects the conservation area as previously mentioned by CADW and should restrict building work of any description as this should remain Greenfields for the beauty on views of our countryside and Historical Church.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has

been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

6309 – Turner

A Green wedge area should be designated between Llanmaes and Llantwit Major bypass, which would protect the Llanmaes conservation area & also Protect our Countryside.

Council Response

Support is noted.

6332 – Leach

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 the 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.

Council Response

Support is noted.

6372 – Pocock

In order to preserve the conservation status of Llanmaes as a small rural village community with agriculture as its mainstay, there must be no risk of coalescence with Llantwit Major. Llanmaes has a distinct identity meaning that, the setting up of this Green Wedge is essential.

Llanmaes is a small , but thriving community accessed from Sigingstone, St Mary Church, St Athan, Eglwys Brewis, and indeed Llantwit Major by a network of narrow unclassified lanes. These are enjoyed by walkers, horse riders, cyclists and of course shared by motor vehicles, including numerous working agricultural traffic. The proposed Green Wedge would serve to conserve this village as part of a network of small villages, which it is important to preserve, and is of particular relevance as Llanmaes will form part of a group of villages as part of the Boundary Commission's recommended changes.

Council Response

Support is noted.

6376 – Hughes

I would like to endorse this proposal: it ensures that the Llanmaes Conservation Area is protected. It prevents the coalescence of urban and rural environments, namely Llantwit

Major and Llanmaes. The fields included in the Green Wedge create an important, peaceful transit zone into Vale lanes and countryside much loved and appreciated not only by Llanmaes residents but also (dog) walkers, runners, cyclists and horse riders who regularly visit this area. The Green Wedge would allow the continuation of a valuable asset that supports the wellbeing of villagers and visitors. Should fields not be protected this would open the floodgates to speculative development and loss of further green space.

Council Response

Support is noted.

6387 – Llanmaes Community Council

Llanmaes Community Council strongly supports this allocation (originally proposed and promoted by ourselves) within the RLDP Deposit Plan. This designation protects this area of open countryside against intrusions from the urban form. It also protects against the visual and physical coalescence of the Town of Llantwit Major and the Village of Llanmaes and protects the setting of the Llanmaes Conservation Area consistent with its adopted Management Plan. Development pressure on this strip of green space is significant as evidenced by the various housing, mixed and retail proposals made to date as part of the RLDP process. Having studied the background papers on the allocation of Green Wedges throughout the Vale of Glamorgan we note that this area scores the highest of all the Green Wedges across the county, including the five existing ones, as recorded in RLDP Background Paper 27 and tested against the Welsh Government's five purposes for designation of a Green Wedge. Therefore, we are very grateful to the RLDP team for their positive evaluation of this site for this classification. We also note the adjustments made to the area covered by the Green Wedge between that originally proposed by ourselves and that in the Deposit Plan and with the exception of the tentative retail designation of the Bridge House Farm parcel we have no objections to these.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

6408 – Harris

I fully support this to create a green wedge between the village of Llanmaes and the Llantwit Major By Pass for the following reasons.

Protects the land from future development.

Llanmaes is a village and rural community and Llantwit Major is a town and urban community and it is important that coalescence does not exist between these two communities.

Protects the views from the Llanmaes Conservation Area as detailed in the Vale of Glamorgan adopted conservation management plan.

Council Response

Support is noted.

6416 – Garvey

The conservation /green wedge between Llantwit Major and Llanmaes must be kept to protect the countryside and separate a village and a town. 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.

Council Response

Support is noted.

As highlighted in the supporting text of RLDP Policy SP12, since the study was undertaken, a planning application for 1,251 sqm of new convenience floorspace has been submitted for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. There was a planning committee resolution to approve, subject to the approval of a Section 106 agreement, but has been called in for determination by Welsh Ministers. However, the allocation of this land will depend upon the outcome of this call in, when a decision has been issued by The Minister. If the application is refused, the land will be included within the green wedge designation between Llantwit Major and Llanmaes and protected under Policy DNP2. Irrespective of the outcome, the remainder of the Green Wedge will remain unaffected and will continue to be designated in the Plan.

7021 – Green

I support the proposal of a green wedge.

Council Response

Support is noted.

<u>COMMENTS AND OBJECTIONS</u>

7055 – Merchant (Geraint John Planning) - Object

We object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the West Croft site.

It is considered the assessment for this green wedge is not soundly based. The decision to include the West Croft site is not justified given its clear relationship with the village and the absence of development pressure. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Suggested change

Change to green wedge boundary.

Council Response

The Council have noted concerns in respect of the inclusion of the West Croft site within the proposed Green Wedge between Llantwit Major and Llanmaes. It is acknowledged that a mapping discrepancy has occurred between the Green Wedge Background Paper (BP27) and the Proposals Map that was published as part of the Deposit Plan consultation. In summary, the paper omits the site from the Green Wedge, whereas the Proposals Map shows a portion of it to be included within the boundary.

In respect of the issue raised by the respondent, it is proposed that an amendment be made to the Proposals Map to follow the red line as shown below.



The Council recognises that it was considered in the assessment that the green wedge should *"Use Llanmaes Brook which forms the southern edge of the existing Conservation Area boundary as the northern boundary of most of the green wedge to the southeast."* Therefore, this amendment is proposed to ensure consistency between the boundaries shown in the Proposals Map and the Green Wedge Background Paper. The site remains outside of the defined settlement boundary for Llanmaes, within a conservation area and partly affected by flood risk. Therefore, irrespective of whether the site is included within a

proposed green wedge or not, the principle of residential development in this location would be unacceptable.

Proposed Change

To ensure consistency between the Proposals Map and the Green Wedge Background Paper (BP27), the Green Wedge boundary between Llantwit Major and Llanmaes shown on the Proposals Map will be amended to align with the boundary identified in the Green Wedge Background Paper.

7178 – Cowling (Geraint John Planning) - Object
7179 – Representative Body of the Church in Wales (Geraint John Planning) - Object
7180 – Reid (Geraint John Planning) - Object

These representations to the Deposit Plan object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the 'Glebelands at Llanmaes' site.

It is considered the assessment for this green wedge is not soundly based. The decision to include the Glebelands site is not justified given that the intentions of the green wedge can be maintained with the omission of our clients site. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Council Response

The Council acknowledges the comments raised in respect of the site 'Glebelands at Llanmaes' which is divided into three parcels, each under separate client ownership.

It is noted that the original candidate site submission for the green wedge did not extend to include the entirety of parcels 2 and 3. However, the reference to Llanmaes Brook, which forms the southern boundary of the existing Conservation Area, relates to the northern boundary of the Green Wedge to the south-east and not to the boundary west of Llanmaes Road. In determining whether the outer boundary should be adjusted in order to use clear boundary features, the assessment concluded that the boundary should:

"Use Llanmaes Road running north aligned with western Conservation Area boundary to unnamed lane leading to farm to the west of Llantwit Major, then use existing field boundaries to join with Frampton Lane to the south of Frampton Court Farm."

The unnamed lane and farm referred to are those located within Parcels 2 and 3. Accordingly, the proposed boundary appropriately reflects the assessment set out in the Green Wedge Background Paper.

In respect of parcel 1, the Council notes that a candidate site (ref. 395) was originally submitted during the first Call for Candidate Sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that:

"Site is outside the strategic growth area and is not proposed for small scale affordable housing led development. A market housing led scheme would not be acceptable in

accordance with the strategy. The scale of the site would not lend itself to a smaller affordable housing led scheme and would be an intrusion into the countryside."

At Deposit Plan, the site remains unallocated for reasons identified at Preferred Strategy stage. The Council also notes that this candidate site submission only related to parcel 1 of the site. The remaining two parcels are included within the candidate site boundary of the Green Wedge.

DNP3 – GLAMORGAN HERITAGE COAST

Four duly made representations were received in respect of Policy DNP3 on the Glamorgan Heritage Coast. One representation was in support of the policy, and the remainder were objections.

The main issues raised were that the plan does not provide sufficient protection for the setting of the Glamorgan Heritage Coast and there were concerns over the cumulative impacts of development on the area particularly Gileston and St Athan and the lack of direct benefit to local communities. It was considered that the RLDP creates policy ambiguity that could be seen to encourage large scale energy infrastructure on greenfield land in sensitive locations. It was also considered that the inclusion of the proposed railway station at St Athan conflicts with the Glamorgan Heritage Coast designation. It was suggested that the policy should allow for small-scale housing developments in the Glamorgan Heritage Coast.

SUPPORT

7172 - Wig Fach Property Company Ltd (Geraint John Planning)

We would offer general support for this policy and consider this to provide flexibility which allows for certain forms of development.

Council Response

Support is noted.

COMMENTS/OBJECTIONS

4725 - Osgood – Object

In its current form, I object to the Deposit RLDP insofar as it does not provide sufficient policy protection for the setting of the Glamorgan Heritage Coast, nor does it adequately address cumulative impacts and infrastructure fairness for villages such as Gileston and St Athan.

Suggested Change

I would urge the Council to strengthen the Plan by: Explicitly protecting the setting of the Glamorgan Heritage Coast from inappropriate development

Council Response

The Council notes the concerns raised in relation to the scale and location of strategic development in the south-western Vale and the potential impacts on Gileston, St Athan and the Glamorgan Heritage Coast (GHC).

The Deposit RLDP has been informed by an extensive evidence base and in accordance with national planning policy, including Future Wales: The National Plan 2040 and Planning Policy Wales, which inter alia, require local authorities to make provision for homes, employment

land, renewable energy and decarbonisation initiatives over the plan period. The RLDP seeks to balance these requirements while protecting the Vale's extensive range of environmental assets and supporting sustainable placemaking.

The Council continues to recognise the importance of the GHC as a nationally significant landscape and recreational asset and policy DNP3 – Glamorgan Heritage Coast maintains the long-standing protection of the area and seeks to protect the special environmental qualities for which the GHC was originally designated.

While the Council notes the concerns raised regarding the setting of the GHC, it is important to recognise that, while policy DNP3 relates specifically to the identified GHC designation, the RLDP must be read and applied as a whole, alongside national planning policy, and that its individual policies combine to deliver the Plan's overall spatial strategy and objectives. In this regard, policies such as strategic policies SP3 – Development in the Countryside, SP4 – Placemaking, SP15 Sustainable Tourism and SP19 – Green Infrastructure and SP20 – Biodiversity and Ecosystem resilience along with general policies such as PGD1 – Creating Well Designed and Inclusive Places, EMP6 – New rural Diversification and Employment Uses in the Countryside will ensure that where development proposals are deemed acceptable, there would be no unacceptable harm to landscape character, visual amenity, tranquillity, or public enjoyment either from the development on its own or cumulatively.

The Council therefore considers that the existing landscape and design policies in the RLDP, provide a robust framework for the assessment of development proposals affecting the wider coastal setting.

The Council acknowledges the concerns raised regarding the perceived imbalance between the impacts of strategic development and the benefits both immediate and cumulative, experienced by local communities, particularly in Gileston and St Athan. However, it is considered that the RLDP provides a clear, coordinated and policy-led framework to ensure that development is supported by appropriate infrastructure and delivers wider community benefits.

The Plan is supported by a detailed evidence base, including transport and infrastructure assessments, which consider cumulative impacts at a strategic level. The Infrastructure Plan accompanying the Deposit RLDP sets out the infrastructure requirements for each site, and these requirements are reflected within the Deposit Plan Policies. The cost to the developer for this additional infrastructure has been accounted for within site specific viability testing to ensure that the requirements can be supported by the development, as set out in Background Paper 42A Independent Financial Viability Assessments of Key Sites.

In transport terms, the Plan is supported by a comprehensive Strategic Transport Assessment (STA), which has identified the infrastructure requirements necessary to support planned growth across the Plan including the St Athan area. This ensures that the implications of

development are fully considered at a strategic level, and that appropriate mitigation and improvements are identified.

In addition, the RLDP will ensure that where appropriate, individual development proposals contribute toward infrastructure provision through established delivery mechanisms such as planning obligations (Section 106), site specific infrastructure requirements and/or phasing and coordination with relevant service and utility providers.

The Council therefore considers that the RLDP provides a robust framework that will ensure that communities across the Vale of Glamorgan including Gileston and St Athan will benefit from improved service provision without unduly constraining appropriate sustainable development.

Concern is raised in the full representation regarding the lack of clarity within the RLDP in relation to large scale energy infrastructure and the fact that the RLDP could be interpreted as supporting such developments on greenfield land and in sensitive rural locations such as the GHC.

While the Council notes the concerns, the RLDP must strike a balance between contributing to the delivery of national energy and climate commitments, and protecting the Vale's natural environmental assets, including the GHC. In seeking this balance, the Council must have regard to national policy which establishes a strong presumption in favour of renewable energy generation whilst requiring appropriate site selection and mitigation as well as the limited availability of brownfield land within the Vale of Glamorgan on which to develop renewable energy capacity.

It is therefore not considered appropriate for the RLDP to impose a rigid locational restriction i.e. a brownfield only approach, to energy infrastructure as not all renewable energy technologies e.g. wind, solar, local grid connections, are capable of being delivered solely on brownfield land due to technical, locational and grid constraints. Further, while national planning policy encourages the re-use of previously developed land where suitable, it does not preclude development on greenfield land where justified.

Therefore, the RLDP adopts a flexible policy framework that encourages use of brownfield land where feasible and viable but does not preclude development in other locations where it can be demonstrated to be acceptable and/or mitigated.

The Council acknowledges the respondents support for renewable and low-carbon energy developments and for prioritising previously developed/brownfield land and both principles are embedded within the RLDP, Objective 1 of which seeks to ensure the efficient use of natural resources, support increased generation of renewable and low carbon energy.

6749 - Hallam Land Management (Savills) – Object

Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain

sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Council Response

While the comments of the representor are noted, the Council maintains that the presence of the proposed transport interchange and ancillary development within the Glamorgan Heritage Coast (GHC) boundary as identified on the Proposals Map does not in itself conflict with Policy DNP3 – Glamorgan Heritage Coast, as the policy is criteria-based and does not seek to prevent all development. Rather, by providing a robust framework against which to manage development proposals, the policy seeks to ensure that development will be permitted where it is essential for inter alia, agriculture, coastal defence, nature conservation, or benefits the local economy.

The inclusion of land within the designation therefore does not preclude development in principle and where development is permitted that might cause adverse impacts on the GHC, the policy criteria seek to ensure that that appropriate mitigation measures are in place.

Specifically:

Criterion 2 – requires that proposed development demonstrates a clear need and is appropriately justified. The identification of a station and transport interchange would form a part of the strategic sustainable transport framework of the RLDP supporting modal shift and reducing the reliance on private vehicles. Further, the development of a station at St Athan would support the local economy and connect the village and employment opportunities across the wider region.

Criterion 3 – would allow development that supports sustainable recreation and tourism or enhances coastal access for walking, cycling and other low-impact recreational activities. The development of a station at St Athan would clearly enhance sustainable access to the GHC, supporting low-impact recreation such as walking and cycling and encourage a shift towards more sustainable tourism patterns.

Criterion 5 - would allow sustainable development where it accords with National Policy. National planning policy places strong emphasis on sustainable transport and modal shift, reducing reliance on the private car, delivering infrastructure that supports low-carbon growth and promoting access to recreation in a sustainable manner. Development of a station and transport interchange at St Athan would clearly accord with these wider national policy objectives.

In addition to the above, the second part of policy DNP3 sets out that where development might have an adverse impact of the special qualities for which the GHC was designated,

development will only be permitted in exceptional circumstances where it has been demonstrated that:

- There is a compelling national need that cannot be met elsewhere.
- The benefits outweigh the likely harm.
- Appropriate mitigation measures are in place to minimise adverse impacts.

The representations identify that the area of the GHC that has been identified for the proposed station and transport interchange do not display any "special environmental qualities" as specified within policy DNP3, and that the area "…plays no intrinsic role in the Policy designation" being influenced by urbanising elements forming a "rather ordinary grazing field".

In this regard, the Council largely concurs with the representor and considers that the benefits derived from a station and transport interchange would far outweigh any harm to the GHC designation and that allied to appropriate mitigation measures identified through detailed design and site layout, there would be little or no direct impact on the GHC.

In addition to the above policy considerations, the development of a station and transport interchange at St Athan is a complex, multi-agency undertaking that has a protracted delivery timeframe, typically requiring the confirmation of funding, the preparation of detailed feasibility and business cases, design and the need for multiple statutory approvals prior to the commencement of any works. As acknowledged within the wider evidence base, while the Council is committed to pursuing the development of the station and transport interchange at St Athan, the proposal remains at an early stage, with delivery dependent on external agencies and longer-term programmes. Given the likely timescales involved, the Council considers that it would be premature to alter a long-standing environmental designation at plan-making stage and it is therefore appropriate and necessary that the GHC designation remains in place. However, as detailed above, in maintaining the designation the Council considers that that should proposals for a station and transport interchange become expedited, Policy DNP3 provides the flexibility to appropriately consider the proposal.

Therefore, while the Council notes the objections made to policy DNP3 – Glamorgan Heritage Coast it maintains that the policy does not contradict with the identification of the station and transport interchange for the reasons set out above and would not propose any changes to Policy DNP3 or the allocation.

7173 - Wig Fach Property Company Ltd (Geraint John Planning) - Object

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. Amendments are proposed as part of the policy to include "small scale housing" or something similar. 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.

Council Response

The representation seeks an amendment to the wording of policy DNP3 – Glamorgan Heritage Coast to allow for the inclusion of "small-scale housing proposals" where policy exceptions are met. The reasoning being that such an amendment would increase flexibility, support the delivery of housing (particularly affordable housing) and allow appropriate development with the GHC designation.

While the Council notes the concerns raised in the representation, it does not believe that a change as suggested is warranted for the following reasons.

This GHC designation reflects the local and national importance of that part of the Vale of Glamorgan coastline as a sensitive environmental asset. In this regard, Policy DNP3 – Glamorgan Heritage Coast, seeks to conserve and enhance the special environmental qualities of the GHC, protecting that landscape character, undeveloped coastline, tranquillity, and visual setting. As such, the policy intentionally places a high level of control and restraint on new development.

Notwithstanding this control, the Council considers that policy DNP3 already enables development that is appropriate and sustainable and which accords with other RLDP policies and national planning policy.

To this end, the supporting text to Policy DNP3 recognises the presence of existing settlements and developed areas e.g. the Minor Rural Settlement of Ogmore, and whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the policy accepts that development within these areas is appropriate, subject to relevant policies of the Plan. Accordingly, proposals for new development including housing developments whether market or affordable housing, are not automatically precluded subject to them being consistent with national planning policy, they do not harm the special qualities of the GHC and they comply with the wider development framework of the RLDP.

Therefore, the Council maintains that an amendment to Policy DNP3 – Glamorgan Heritage Coast as suggested by the respondent is unwarranted as the policy and the other polices of the RLDP already allows an appropriate level of flexibility that would enable small scale development in appropriate locations within the GHC.

DNP4 - HISTORIC ENVIRONMENT

Two representations were submitted in respect of Policy DNP4 Historic Environment - a representation raising general concerns over proposed retail development between Llantwit Major and Llanmaes and a universal consultation response on heritage matters.

5788 - Kirkham - Comment

Any development on the green wedge between Llanmaes and Llantwit Major makes a mockery of this policy. Conservation areas need appropriate protection including from inappropriate development overlooking them. Any development on the green wedge between Llanmaes and Llantwit Major makes a mockery of this policy. Conservation areas need appropriate protection including from inappropriate development overlooking them.

Council Response

Policy DNP4 – Historic Environment seeks to protect the many elements of the historic environment within the Vale of Glamorgan. The preservation and enhancement of the historic environment, including the settings of historic assets, is a key aspect of the Council's wider responsibilities, and will constitute a material consideration of significant weight when determining applications affecting such assets.

The concerns expressed in the representation relate to a recent application for a class A1 food store at Bridge House Farm, Llanmaes, adjacent to Llantwit Major. A planning committee resolution to approve the application subject to the agreement of a Section 106 agreement was made in February 2025, however the application was called in for determination by Welsh Ministers and a decision is awaited following an Inquiry held in June 2026. The impact on the setting of the Llanmaes Conservation Area is a consideration within the decision making process.

The proposal is considered in more detail in the response to SP12.2.

6602 - Barton - Comment

LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets).

Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing.

Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.

Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.

Volunteer labouring assemblies should be fully encouraged and supported identifying key individual and group skillsets that can be utilised to protect historic buildings or areas at risk.

Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones.

Where there have been evolving building styles over years, e.g. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, i.e. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders.

Council Response

The representation has been prepared as a universal response to development plan consultations across the UK. While not specific to the Vale of Glamorgan RLDP or individual sites, the representation is relevant insofar as it supports more prescriptive design, stronger heritage protection, and the use of heritage assets as a climate and regeneration tool, all of which intersect with the strategic objectives of the Vale RLDP. Notwithstanding this, much of the representation relates solely to the English planning regime or is outside the realms of the RLDP. Therefore, while the comments are noted, the Council considers that the current suite of polices relating to the protection of the historic environment coupled with national guidance and best practice adequately address any issues which may be raised within the representation.

DNP5 - ENVIRONMENTAL PROTECTION

A total of 11 duly made representations were submitted in respect of Policy DNP5 Environmental Protection (2 objections, 6 comments and 3 support). The issues raised and within the objections have been summarised below and full Council response to each issues raised.

There was general support for the policy and the recognition of the need to safeguard natural resources from the impacts of development. Representations highlighted the need for flood prevention measures at Llanmaes, requesting that the Council seek the reinstatement of flood alleviation scheme previously identified by the Welsh Government, and the scheme be identified in the RLDP. There was also a need to ensure that upgrades are made to water infrastructure (sewage) prior to development to avoid pollution of ground waters. It was also suggested that Best and Most Versatile (BMV) Land be removed from the policy, arguing that the loss of BMV land would have limited impact on the environment or residential amenity.

STATUTORY CONSULTEE RESPONSES

5761 - Mining Remediation Authority

Although our records indicate that there is very limited coal mining legacy in the Vale of Glamorgan area, we are still pleased to see that land stability is included as a criterion for Policy DNP5 when new development is proposed.

Council Response

Comments and support are noted.

6971 - Dwr Cymru Welsh Water

We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.

Council Response

Comments and support are noted.

6390 - Llanmaes Community Council - Comment

Flood Alleviation – proposals for Flood Alleviation for Llanmaes Village The need for a flood alleviation scheme for Llanmaes is acknowledged on several occasions in the Deposit Plan but unfortunately there are no specific proposals therein. The Community Council would firstly like to record our appreciation of the continued acknowledgement of the need for a Flood Alleviation Scheme for Llanmaes and would urge the Vale of Glamorgan Council to redouble its efforts with the Welsh Government to revive this, currently shelved, project.

Council Response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation.

INDIVIDUAL RESPONSES

SUPPORT

5789 - Kirkham

Absolutely necessary in the case of Llanmaes and the disputed Lidl development

Council Response

Comments and support are noted.

COMMENTS/OBJECTIONS

6150 – Williams - Comment

In Rhoose, the current infrastructure is insufficient for the current population. Any increase in housing provision must include a complete overhaul and upgrading of the sewage system before additional housing. In this day and age, it is unacceptable to have sewage leaking into the ground drainage – as I understand happened recently when the road under the bridge at Fontygary flooded. As I identified elsewhere, the additional housing at Readers Way, Rhoose would increase the risk of more instances of flooding were run off from the land already causes problems.

Council Response

The Council in preparing the RLDP has consulted with Dwr Cymru Welsh Water in order to identify the capacity of existing infrastructure, and where additional investment/upgrades will be required to support new developments. Information for each site is contained within the RLDP Infrastructure Delivery Plan (BP44) and at Appendix 2 of the Deposit Plan. Additionally, in respect of groundwater flood risk and contamination, since 2019 new developments have been required to incorporate Sustainable Urban Drainage systems (SuDS) to manage surface water run off sustainably to avoid flood risk and ground water pollution. This process is administered by the Council through the SuDS Approval Body (SAB) and as all schemes would need to design to the satisfaction of the Council before

development can commence. These requirements are reflected within criteria 1 of Policy DNP5.

6232 - Arnold - Comment

The flood alleviation scheme for Llanmaes has been mentioned several times in the RDLP but there are no specific details. Given the flooding that has taken place recently this scheme should be expedited with full details provided.

Council Response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation

6374 - Pocock - Object

A flood alleviation scheme for Llanmaes has been in place and, indeed, ground works were started but then abandoned following the Covid19 pandemic. The village drainage system combines sewage and rain water run off and is overwhelmed every winter after a period of wet weather. This year a number of homes suffered sewage overflows and raw sewage flooding on the Llanmaes recreation field is an annual event. In the case of the latter, the only place for the sewage to drain is into the brook and be carried via Boverton until it reaches Llantwit beach. Welsh Water have carried out various works over the last few years, including the deployment of pumps for weeks at a time, but the underlying problem is not really addressed.

Suggested Change

Llanmaes needs the flood alleviation scheme to be re-instated

Council Response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control

through the RLDP process, and its allocation within the RLDP would not secure its implementation

6379 – Hughes – Object

Flood Alleviation - Llanmaes residents should still not have to rely on floodgates as their only means of defence in the face of heavy rainfall. The much discussed but never fully implemented Flood Alleviation Scheme, should be included in the RLDP. In addition, if the ill-conceived retail development at Bridge Farm is rejected, this land, plus the Green Wedge, could be used for ecologically sustainable tree planting.

Suggested Change

Llanmaes Flood Alleviation Scheme, should be included in the RLDP.

Council Response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation

6411 - Harris - Comment

Flood alleviation for Llanmaes is acknowledged in the plan but no action is proposed. This has been ongoing for over 20 years resulting in a number of houses suffering from flooding resulting in a physical and emotional impact on the community. This matter need to be urgently actioned

Council Response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation

6538 – Leach - Comment

Finally, I want to talk about the flood alleviation scheme, we are affected by this as part of the project is over our land in Siginstone lane. The RLDP mentions 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.

Council Response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation

6849 - Taylor Wimpey (Savills)

Taylor Wimpey considers the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property. It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high-quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County.

The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance.

In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high-quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery. Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning

conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes."

However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Council Response

Policy DNP5 relates to impacts on people, residential amenity, property and/or the natural environment. By the inclusion of the term 'and/or' it is clear that the impact does not have to be on all four elements, and it is therefore acceptable in terms of BMV that there is only an impact on the natural environment.

The inclusion of BMV reflects national planning policy requirements for LDPs to protect and conserve such land in recognition of it as a finite resource, which should only be developed if there is an overriding need. This precautionary approach of avoiding the loss of agricultural land has been integral to the assessment and identification of site allocations within the plan, as evidenced by the Council in Background Paper 23A Best and Most Versatile Agricultural Land. It is also noted that the Welsh Government in their representations to the Deposit RLDP acknowledge and support the precautionary approach taken by the Council in respect of BMV land.

It therefore follows that this precautionary approach be reflected within the policies of the RLDP. The Council also wish to highlight that Policy DNP5 replicates Policy MD7 of the Adopted Vale of Glamorgan LDP and as such the protection of BMV land through policy is a longstanding position within the Vale of Glamorgan.

However, the Council acknowledges the need for clarification in respect of BMV land raised within the representation, as the supporting text in Paragraph 6.430 relates to pollution rather than the. Accordingly, to ensure clarity, the Council propose to amend the written justification to Policy DNP5 paragraph 6.4.30 to clarify how the Council will consider development proposals on land where the presence of BMV land is known.

The representation refers to Land West of Swanbridge Rd which has been submitted as a candidate site (candidate site reference 376). This has been excluded from the RLDP due to the presence of BMV agricultural land across the entirety of the site, as verified by the site promoters own agricultural land quality assessment.

As stated, national policy requires local authorities to safeguard and conserve BMV land, with paragraph 3.58 stating that:

"*When considering the search sequence and in development plan policies and development management decisions considerable weight should be given to protecting such land from*

development, because of its special importance. Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade."

Accordingly, the Council has allocated sites within the RLDP to meet the housing requirements of the plan whilst minimising the loss of BMV within the authority.

Proposed Change

Amend Paragraph 6.430 to include the following in respect of proposals affecting BMV land:

6.4.30 Policy DNP5 follows the precautionary approach, and the Council encourages developers to assess any impact at the earliest stage so that development proposals reduce any impact present to an acceptable level. Where development is permitted conditions will be attached to the approval to minimise any potential pollution levels and where appropriate monitor the effects of the development. **For proposals that would result in the loss of grades 1, 2 and 3a Best and Most Versatile Land, these will be considered in accordance the policy requirements set out in Planning Policy Wales.**

DNP6 - QUIET AREAS

A total of 2 duly made representations were submitted in respect of Policy DNP6 Quiet Areas. The primary issue raised being why the areas identified in the policy were limited to Penarth and did not extend to other areas within the Vale of Glamorgan e.g. Barry.

5502 - A Vincent - Comment

It would be very nice to have some quiet and tranquil places in Barry, the busiest and most potentially noisy settlement in the RLDP. I wonder why only Penarth is deserving of such places? Puzzling

Council Response

Quiet Areas are places of public value where low levels of environmental noise contribute positively to health, wellbeing and quality of life. They are typically tranquil outdoor spaces such as parks, gardens, woodlands or natural areas, especially within or close to urban environments.

They are identified under the EU Environmental Noise Directive (2002/49/EC), which requires Member States to assess environmental noise, produce action plans, and protect areas valuable for tranquillity; this Directive is implemented in Wales through the Environmental Noise (Wales) Regulations 2006, which place a duty on Welsh Ministers to identify Quiet Areas within urban agglomerations and protect them from noise increases. Identification is based on strategic noise mapping and designated Quiet Areas are incorporated into national Noise and Soundscape Action Plans and planning policy.

Agglomerations are formally designated by the Welsh Ministers and typically include Wales' largest urban centres or continuous built-up areas, such as Cardiff, Swansea and surrounding urban areas. Within these areas, there is a statutory requirement to:

- Produce strategic noise maps showing population exposure to transport and industrial noise.
- Prepare Noise Action Plans to manage noise impacts; and
- Identify and protect Quiet Areas that provide respite from environmental noise.

Strategic noise maps and action plans must be produced for agglomerations with a population of more than 100,000 people: for major roads with more than 3,000,000 vehicle passages per year, and for major railways with more than 30,000 train movements per year. The strategic noise maps are based on the most recently published versions, by the Welsh Government.

Penarth is physically and functionally contiguous with Cardiff and forms part of the Cardiff and Vale of Glamorgan agglomeration, which was designated for the purposes of the Noise Regulations. The reasons are regulatory, technical, and historical rather than a judgement on the environmental quality of the rest of the Vale. No equivalent agglomeration-level

assessment was therefore carried out for the remainder of the Vale, as this was not required by the Regulations.

Quiet Areas within Welsh agglomerations are reviewed on a five-yearly cycle, alongside statutory strategic noise mapping and Noise and Soundscape Action Plans, with the current review period running to 2028 unless amended by Welsh Ministers.

The Council is therefore satisfied that the current quiet areas identified in Policy DNP6 reflect the current status of quiet areas in Wales.

6946 - Penarth Town Council – Comment

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

Council Response

Quiet Areas are places of public value where low levels of environmental noise contribute positively to health, wellbeing and quality of life. They are typically tranquil outdoor spaces such as parks, gardens, woodlands or natural areas, especially within or close to urban environments.

They are identified under the EU Environmental Noise Directive (2002/49/EC), which requires Member States to assess environmental noise, produce action plans, and protect areas valuable for tranquillity; this Directive is implemented in Wales through the Environmental Noise (Wales) Regulations 2006, which place a duty on Welsh Ministers to identify Quiet Areas within urban agglomerations and protect them from noise increases. Identification is based on strategic noise mapping and designated Quiet Areas are incorporated into national Noise and Soundscape Action Plans and planning policy.

Agglomerations are formally designated by the Welsh Ministers and typically include Wales' largest urban centres or continuous built-up areas, such as Cardiff, Swansea and surrounding urban areas. Within these areas, there is a statutory requirement to:

- Produce strategic noise maps showing population exposure to transport and industrial noise.
- Prepare Noise Action Plans to manage noise impacts; and
- Identify and protect Quiet Areas that provide respite from environmental noise.

Strategic noise maps and action plans must be produced for agglomerations with a population of more than 100,000 people: for major roads with more than 3,000,000 vehicle passages per year, and for major railways with more than 30,000 train movements per year. The strategic noise maps are based on the most recently published versions, by the Welsh Government.

Penarth is physically and functionally contiguous with Cardiff and forms part of the Cardiff and Vale of Glamorgan agglomeration, which was designated for the purposes of the Noise

Regulations. The reasons are regulatory, technical, and historical rather than a judgement on the environmental quality of the rest of the Vale. No equivalent agglomeration-level assessment was therefore carried out for the remainder of the Vale, as this was not required by the Regulations.

Quiet Areas within Welsh agglomerations are reviewed on a five-yearly cycle, alongside statutory strategic noise mapping and Noise and Soundscape Action Plans, with the current review period running to 2028 unless amended by Welsh Ministers.

The Council is therefore satisfied that the current quiet areas identified in Policy DNP6 reflect the current status of quiet areas in Wales.

DNP7 – DARK SKIES

Three representations were submitted on Policy DNP7 Dark Skies. Two supported the policy and a third, from South Wales Police, requested consultation on applications to allow them to provide advice on lighting.

STATUTORY CONSULTEE RESPONSES

6646 - Natural Resources Wales (NRW) - Support

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.

Council response

Support is noted.

6623 - South Wales Police – Secured by Design Officer - Comment

Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.

Council Response

The Council formally consult the South Wales Police Designing Out Crime Officer who provides advice in respect incorporating measures to ensure developments are safe and increase safety in places people live, work and socialise and make comments on lighting.

INDIVIDUAL RESPONSES

SUPPORT

6203 - David Ambrose

It is vital in relation to SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE that proposals for external lighting (including security lighting, amenity lighting, illuminated advertisements and lighting associated with highways, car parks, sports facilities and commercial and industrial operations) will only be permitted where it has been demonstrated that the lighting proposed has no adverse impacts on biodiversity and ecological connectivity or visual and landscape character.

Council response

Support is noted.

DNP8 – SEVERN ESTUARY RECREATIONAL PRESSURE

A total of 2 duly made representations were received in respect of Policy DNP8 on Severn Estuary Recreational Pressure, raising concerns around deliverability, evidence and costs.

This matter is also addressed in representations on the Habitats Regulations Assessments.

INDIVIDUAL RESPONSES

6793 – Persimmon Homes (Boyer Planning) - Object
6926 – Barratt Redrow Homes (Boyer Planning) - Object

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

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

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.

Suggested Change

The scale and mechanism of any contributions must be clearly established as part of the plan-making process.

Council response

The Council acknowledges the concerns raised by the representors. In recognition of the need to progress this matter in advance of the adoption of the RLDP, the Council has appointed Footprint Ecology to prepare a mitigation strategy to address recreational pressure on the Severn Estuary SAC, SPA and Ramsar Site. This is being developed jointly with the neighbouring authority of Cardiff Council.

The draft Cardiff and Vale Severn Estuary Recreation Mitigation Strategy is at an advanced stage of preparation. The strategy advocates collaborative working with neighbouring authorities and the Association of Severn Estuary Relevant Authorities (ASERA). It is anticipated that, as development plans progress across South East Wales, a wider regional approach to mitigation can be developed, providing opportunities to share mitigation costs and resources. This is reflected in the strategy, which states:

"*The strategy is produced as an initial, interim strategy that will run for around 5 years. After 5 years it will be necessary to review and update the strategy and, by this point, it may be that a more strategic estuary-wide approach can supersede this strategy. Any review or update will need to include a check on housing numbers, delivery, costs and mitigation priorities.*"

The 12.6 km distance reflects the maximum zone of influence currently used by other local authorities around the estuary and establishes the area within which mitigation is required. The draft Recreation Mitigation Strategy explains that the 12.6 km distance has been adopted in the absence of more detailed visitor data and represents a precautionary approach. The strategy identifies a visitor survey as a key and relatively urgent priority, given the current lack of comprehensive visitor information. Such a survey will provide the evidence necessary to review and validate the zone of influence. In recognition that the survey findings may result in a reduction to the 12.6 km radius, it is proposed that reference to the visitor survey be included within paragraph 6.442. The Council is committed to undertaking visitor survey work at the earliest opportunity in order to strengthen the evidence base. However, in the absence of such data, it is considered entirely appropriate to apply the precautionary approach of using a 12.6 km zone of influence.

The Strategy focuses on Strategic Access Management and Monitoring (SAMM) measures and identifies a range of interventions designed to reduce recreational pressure on the estuary during the wintering bird season across Cardiff and the Vale of Glamorgan. The strategy calculates the long-term costs associated with delivering these measures and

apportions a per-dwelling contribution based on the anticipated number of uncommitted dwellings expected to come forward over the respective plan periods. The final per-dwelling contribution is yet to be determined; however, it is not anticipated to be at a level that would adversely affect development viability. For the two key sites located within the 12.6 km zone of influence of the SAC, a nominal allowance was incorporated into the site-specific viability assessments reviewed by Burrows-Hutchinson (BP42A). It is considered that there is sufficient headroom for mitigation costs to be accommodated within both the high-level viability assessments and the viability of other allocated sites.

It is also recognised that there will be a requirement for Suitable Alternative Natural Greenspace (SANG) provision to offer alternative recreational destinations and thereby reduce pressure on the estuary. On larger sites, there will be opportunities to provide SANG on-site, and reference to this requirement is already included within the key site policies for KS1 and KS2. In the absence of visitor survey data, it is also proposed that reference be made to SANG provision at KS3 Readers Way, Rhoose. Whilst this site lies beyond the 12.6 km radius of the SAC, it is located within 12.6 km of the SPA and Ramsar designations associated with Sully Island. However, this position may be reviewed following analysis of future visitor survey data to establish visitor travel patterns to Sully Island, which is a tidal feature and accessible only for approximately three hours either side of high tide.

The Council is also exploring options for strategic SANG provision. As part of the proposed changes to the RLDP, amendments are proposed under Policy CI1 (Provision of Open Space) to identify extensions to Porthkerry Country Park and Cosmeston Lakes Country Park as potential strategic SANG opportunities.

Proposed change

Amend paragraph 6.442 as follows:

A Core Recreational Catchment zone of 12.6km has been identified in the HRA to inform the RLDP as a consistent recreational catchment around the European site. **However, this catchment zone may be refined in light of locally specific visitor survey information.** ~~This~~ **The Core Recreational Catchment Zone** indicates where new development might be required to make financial contribution to fund on-site SAC/SPA/Ramsar conservation measures, as part of strategic mitigation measures. This takes the form of a recreation mitigation and management strategy and would include a mixture of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) measures.

6.443 The provision of SANG must be a key design consideration **for** ~~in~~ developments within ~~12.6km of the Severn Estuary~~ **the Core Recreational Catchment.** The Council has prepared a Recreation Mitigation Strategy which will be subject to regular review and will provide further information on the mechanisms for delivery.

ANNEX 9 – INTEGRATED SUSTAINABILITY APPRAISAL AND HABITATS REGULATIONS ASSESSMENT

INTEGRATED SUSTAINABILITY APPRAISAL

6890 – Taylor Wimpey (Savills) - Object

The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.

Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

Council response

All candidate sites were subject to a robust assessment in line with the Council's Candidate Site Assessment Methodology, in addition to the Integrated Sustainability Appraisal which is, as the respondent notes, GIS based analysis. In determining which sites were taken forward as allocations, a number of factors were considered, not only the ISA scoring. Notably, in the case of the site being promoted by the respondent (376 Land West of Swanbridge Road, Sully) a comparison is being made with a key site housing allocation in another settlement - a settlement that is two tiers higher in the settlement hierarchy.

7032 – Natural Resources Wales – Object

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.

Council response

As discussed in relation to representation 6642, where sites are in proximity to a statutorily designated site, this will be referenced in Appendix 2 and in the key site policy, where appropriate.

HABITATS REGULATIONS ASSESSMENT

6674 – Natural Resources Wales - Object

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.

Council response

The comments on coastal squeeze, loss of functionally linked habitat and visual and noise disturbance are noted.

With regards to DNP8, it is accepted that there is a minor difference in the wording of the policy when the HRA and RLDP are compared. The HRA refers to the SAC/Ramsar/SPA as a European Marine Site, whereas the RLDP refers to it more directly as the SAC/Ramsar/SPA. This different has no impact on how the policy is interpreted so this is not considered that

this is a matter that requires any amendments to the policy. It also considered that the title of the policy is appropriate.

The Severn Estuary SAC/Ramsar/SPA extends alongside the estuarine coastline between Penarth and Lavenock Point. However, the Ramsar and SPA also includes Sully Island, a tidal island off the coast at Swanbridge, which is only accessible for 3 hours either side of high tide. The HRA concluded that as Sully Island is not readily accessible it is unlikely to be impacted by recreational pressure resulting from the RLDP and therefore the 12.6km boundary was drawn from the Penarth to Lavernock Point coastline rather than from Sully Island. However, if the boundary also included Sully Island, 12.6km would also include KS3 Land at Readers Way.

The Council has appointed Footprint Ecology to prepare a mitigation strategy for recreational pressure on the Severn Estuary SAC/Ramsar/SPA. This is a joint commission with Cardiff. As no visitor data is currently available to assess how many visitors there are to Sully Island in the winter months (the time that the island is used by wintering birds) it cannot be ruled out definitively that there is no recreational pressure and it is therefore proposed to take a precautionary approach to the assessment. The consequence of this is that the 12.6km boundary will be amended so that it includes Sully Island Ramsar/SPA rather than just the SAC. The consequence of this is that KS3 will now be included in the boundary and therefore the site will need to form part of the SANG and SAMM mitigation strategy. This will need to be referenced in the plan.

ANNEX 10 – NEW SITES AT DEPOSIT STAGE

Site Reference	Site Name	Proposed Use	ISA submitted	DVM submitted	Comment
4419	Land at the Verlands, Cowbridge	Residential	Yes	Yes	The site is partly located within a TAN15 defended zone and is also significantly affected by small watercourse flooding, which would affect the access. The site is not supported by Flood Consequences Assessment work to demonstrate that the risk of flooding can be acceptably managed.
4458	The Lawns, Cwrt yr Ala, Michaelston-le-pit	Residential	Yes	Yes	The site is located in the open countryside and has no relationship with any defined settlements within the Vale. It would therefore fail to accord with the Strategy for the Plan. Limited evidence has been submitted in support of the site.
4516	Land at Sunnycroft Lane, Dinas Powys	Residential	No	No	Limited evidence has been submitted in support of the site, and the submission is not supported by an Integrated Sustainability Appraisal (as required by the Development Plans Manual, or a viability assessment (DVM). It is, however, located within the settlement boundary so could potentially be brought forward as a windfall development should existing highways constraints be resolved in the future.
4523	Land adjoining Inglenook, Sully Road, Penarth	Countryside Management	No	No	Limited evidence has been submitted in support of the site, and the submission is not supported by an Integrated Sustainability Appraisal (as required by the Development Plans Manual, or a viability assessment (DVM).

4541	Land to the south of Tennis Courts, Llancarfan	Residential	No	No	Limited evidence has been submitted in support of the site, and the submission is not supported by an Integrated Sustainability Appraisal (as required by the Development Plans Manual, or a viability assessment (DVM).
5801	Land at Ty Fry Farm, Llandow	Residential	No	No	Limited evidence has been submitted in support of the site, and the submission is not supported by an Integrated Sustainability Appraisal (as required by the Development Plans Manual, or a viability assessment (DVM). The proposal is for a single dwelling and is therefore below the site size threshold required for allocation.
5867	Maes Yr Bryn, Highfield Farm, Colwinston	Residential	Yes	Yes	The proposed sites forms part of a site that was previously submitted as a candidate site (2782 Pantiles Field, Colwinston). The site was not considered suitable for the following reason: "*This site is on the edge of the settlement and its development would not relate well to the existing pattern of development in Colwinston. It would be considered an unacceptable incursion into the countryside.*" The same assessment would apply to a smaller site.
6002	Crossways Industrial Estate	Commercial	Yes	Yes	The proposal relates to the redevelopment of an existing timber yard and expansion into an adjoining field for small scale industrial units. The site is in a rural location some distance from the nearest settlement (Cowbridge). The location is not considered to be a sustainable location for the type of employment proposed.

6068	Penlan Road, Llandough	Commercial	No	No	Limited evidence has been submitted in support of the site, and the submission is not supported by an Integrated Sustainability Appraisal (as required by the Development Plans Manual, or a viability assessment (DVM).
6111	Land off Milleniwm Way, Barry	Industrial	Yes	Yes	The suitability of the site is discussed in detail in the response to Policy EMP3 (representation 7181) where it was concluded that the site was not deliverable. There is a proposed change to the settlement boundary, however, which would allow the site to come forward as a windfall employment site if circumstances change.
6151	Land at Manor House, Dyffryn Lane, St Nicholas	Residential	Yes	Yes	The site was previously submitted as a candidate site (421) for open market housing but was not considered further for the following reason: "*The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area through the loss of a site identified as providing important views. It is also considered to represent an unacceptable intrusion into the open countryside. The site would result in the loss of 3a land, contrary to national planning policy."* The site has now been resubmitted for an affordable housing led development, but the previous reasons for rejected are still relevant.

ANNEX 11 – REPRESENTATIONS ON CANDIDATE SITES

BARRY

Where representations were made on candidate sites that have been allocated in the RLDP, the representations have been attributed to the allocated site, rather than the candidate site.

The table below sets out the number of representations received on each site and a response. Where a candidate site is not included on the list below, this is because no representations were received. Only duly made representations are included.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
371	Walters Farm	Barry	Housing	0	1	4	Representors raised concerns about traffic, biodiversity impact and infrastructure capacity. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Development of the site would have a significant negative impact on a locally designated SINC and have detrimental impact on protected or priority species, habitats, stepping stones or wildlife corridors. The site is poorly related to the existing built form and would represent sporadic development in the countryside.
407	Land West of Coed Mawr Road	Barry	Housing	0	0	1	Representors raised concerns about traffic, biodiversity impact and infrastructure capacity. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The development of this site would be an arbitrary incursion into the countryside in this location. The development of the site would significantly affect a nearby SINC, Ancient Woodlands and SSSI designations. Major highway constraints - the proposed site is unable to provide a suitable and safe means of access into the development.
420	Land off Port Road, Barry	Barry	Housing	0	3	1	Representors raised concerns about traffic, biodiversity impact, infrastructure capacity and flooding. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is located wholly within a CADW Registered Park and Garden, and the nature of the proposed development would result in harm to the significance of this designated historic asset. Furthermore, the site is located within the countryside, away from any settlement. It is also, therefore, an unsustainable site that would be inappropriate for residential development, as set out in national planning policy.

COASTAL VALE (RHOOSE, ST ATHAN & LLANTWIT MAJOR)

Where representations were made on candidate sites that have been allocated in the RLDP, the representations have been attributed to the allocated site, rather than the candidate site.

The table below sets out the number of representations received on each site and a response. Where a candidate site is not included on the list below, this is because no representations were received. Only duly made representations are included.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
361	Land at Port Road, Rhoose	Rhoose	Other proposed use	0	0	3	The site has been retained within the boundary of Employment allocation SP14.1 Land east of Cardiff Airport Representations raise concerns about traffic and infrastructure capacity.
364	Parc Hoddnant	Llantwit Major	Housing	0	0	1	Representors raised concerns about traffic, highways safety, flooding, privacy, loss of agricultural land and impact on protected species. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Due to the presence of protected species present within the site as supported by ecological surveys, development of the site would significantly impact on the protected species.
377	Land adjoining Heritage Business Park	Llantwit Major	Cemetery	0	1	0	The representor (Llantwit Major Town Council) notes that the current provision is inadequate and there is a risk that burial and memorial space will run out. Background Paper 38 (Cemeteries and Crematoria) November 2025 establishes the case for additional land and LMTC strongly takes the view that additional land is urgently required. LMTC is therefore very supportive of placing this site within the Replacement LDP and wishes its views to be taken into account. The land identified is easily accessible and would be ideal for this purpose. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Whilst the review of burial land indicates that burial land capacity is likely to be required by the end of the plan period in Llantwit Major, no additional information was submitted in support of the candidate site for this proposed use and therefore there is no evidence that this site is deliverable. Whilst the site hasn't been allocated for this purpose, the plan does include a criteria-based policy which would allow suitable sites to be developed where appropriate.
395	Glebelands at Llanmaes	Llanmaes	Housing	0	0	3	Representors raised concerns about coalescence, impact on a historic village, flooding, traffic, lack of infrastructure and highway safety. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Site is outside of the strategic growth area and is not proposed for small scale affordable housing led development. A market housing led scheme would not be acceptable in accordance with the strategy. The scale of the site would not lend itself to a smaller affordable housing led scheme and would be an intrusion into the countryside.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
399	Land at St Athan	St Athan	Housing	0	0	2	Representors raised concerns about the loss of green space, lack of infrastructure and highway safety. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site was deemed to accord with the strategy and was considered a logical extension at Preferred Strategy stage. It was concluded that this site would only be suitable for allocation if additional sites were required. There has been a decrease in units at Church Farm compared to the numbers identified at Preferred Strategy due to the inclusion of a foodstore within the proposals. A number of candidate sites have been proposed in St Athan, and it would not appropriate to allocate every site. When determining which sites should be allocated, consideration has been given to a number of factors including site constraints, relationship to the existing settlement, proximity to services, facilities, public transport and active travel routes and deliverability. Whilst site 399 does adjoin the existing settlement it is in a more peripheral location than the other proposed housing sites in St Athan, it is a further distance from services and facilities in St Athan and therefore other sites have been identified in preference.
410	The Quarries and adjoining Land	Llantrithyd	Minerals – retention and extension	1	0	0	The site promoter (supporting the site) comments that the candidate submission sought retention of quarry status as well as longer-term safeguarding, and that the site has benefited from ROMP approval ref. 2024/00246/ENV, which permits operations until 21 February 2042. The consented quarry element should continue to be positively recognised in the Plan, reflecting its existing planning status, updated ROMP conditions and ongoing minerals planning context. Continued extraction would make productive use of an existing quarry site, avoid sterilisation of unworked reserves, provide continuity and resilience of mineral supply, support local economic benefits and allow restoration-led environmental gains through planting, habitat creation and long-term after-use. The site promoter considers that current treatment of Pant-y-Ffynnon Quarry does not fully reflect the evidence before the Council on the site's planning status, deliverability and continuing operational role. The Plan does not go far enough in applying national minerals policy when considering the ongoing role of Pant-y-Ffynnon Quarry. Council response: The RLDP formally recognises the active status of the existing quarry through its identification on the Proposals Map, with reference to its status and ROMP application included in Background Paper BP25: Minerals. While a candidate site extension to the existing quarry has been promoted, its allocation is not considered appropriate for the following reasons: The quarry extension area comprises Grade 3a Best and Most Versatile (BMV) agricultural land, the loss of which is unjustified under national planning policy. 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.
414	Land to the east of Fonmon Road, Rhoose	Rhoose	Housing	0	0	2	Representors raised concerns about traffic, pollution and infrastructure capacity. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: The site is located within a quarry buffer zone and promoted for residential development; it is therefore considered inappropriate development.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
418	Land West of Fonmon Road, Fontygary	Rhoose	Housing	0	0	1	Representors raised concerns about traffic and pollution. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: The site is unrelated to the existing built form and would represent sporadic development int the countryside. The site is located within a quarry buffer zone and promoted for residential development; it is therefore considered inappropriate development.
422	Land to the northeast of Llancarfan	Llancarfan	Housing	0	0	1	Representors raised concerns about the impact on the character of the village. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: The site is unrelated to the settlement of Llancarfan and would represent unacceptable intrusion in to the open countryside. The site would have an unacceptable impact on the Llancarfan Conservation Area and Landscape of Historical Interests.
436	Land between Llantwit Major and Llanmaes	Llantwit Major	Other proposed use	0	0	2	A new green wedge DNP2 (6) Between Llantwit Major and Llanmaes has been included in the Deposit Plan. This excludes the area identified for retail (SP12 (2) Land at Bridge House Farm) pending the outcome of the call in decision. Representors raised concerns about the site being developed on the grounds of impact on the conservation area, flooding and coalescence.
461	Land at Boverton	Llantwit Major	Affordable housing led	0	0	6	Representors raised concerns about ecology, flooding, traffic and impact on the conservation area. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: The site is in a prominent location within the Boverton Conservation Area and is identified in the associated Conservation Area Appraisal and Management Plan as having significant trees and tree groups on the land. The development of this site would result in significant harm to the significance of the Boverton Conservation Area.
473	Land south of the B4265	Llantwit Major	Retail	0	0	6	Representors raised concerns about ecology, coalescence, traffic and impact on the conservation area and the setting of listed buildings. The site has been allocated for employment in the RLDP. Justification for the allocation is set out in BP18A Candidate Site Assessment at Deposit Stage: The site is located within the Boverton Conservation Area and forms part of a wider undeveloped section of land that provides a rural setting to the historic village. It is considered that the rural setting has been significant eroded in the past due to developments to the north and west and the development of this site would result in coalescence of built form and reduce further the limited rural setting. Furthermore, provision has been made for additional retailing in the wider Llantwit Major through the allocation of retail sites at St Athan, as part of a key site allocation (SP12(1)), and Bridge House Farm in Llantwit Major (SP12(2)). The latter has been approved by planning committee but it subject to a ministerial call in.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
481	Land to the North of Boverton Road	Llantwit Major	Housing	0	0	6	Representors raised concerns about ecology, coalescence , traffic and impact on the conservation area and the setting of listed buildings. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Further information was submitted by the site promoter as part of the Preferred Strategy consultation. This was reviewed by the Council's Conservation Officer who raised an objection due to the impact to the character of the Conservation Area. The key concerns are to the coalescence of built form as well as detriment to the rural setting of the village its historic form and tranquil character of Boverton Road. A further consideration from the proposal is that of the need for potential highway upgrades to Boverton Road. It is understood that the proposed access is along Boverton Road and there are many designations e.g. listed buildings, boundaries of significance, that may affect the ability to upgrade this route. The character is currently that of a highway which reflects a transition from residential street to rural lane, any upgrade that overly formalised the route would raise a concern. The site has not therefore been taken forward as an allocation.
488	Land to the South of Rhoose train station	Rhoose	Housing	0	0	1	Representors raised concerns about traffic, poor public transport and active travel routes and a lack of facilities. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: The site promoter has confirmed that they no longer have an interest in this land and will not be submitting any further information in respect of it. Therefore, the site will not be considered further and has been ruled out at Stage 1.
492	Land North of Porthkerry Road	Rhoose	Housing	0	1	1	Representors raised concerns about traffic, poor public transport and a lack of facilities. Network Rail made comments about the need for mitigation for level crossing risk. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site was resubmitted at the second call for sites stage. Two options were identified - a reduced site size and an amendment to housing only rather than housing and commercial. See 2783 and 2798. It must also be noted that sites 2783 and 2798 are not being taken forward in addition.
510	Gileston Farm	St Athan	Renewable energy	0	0	1	Representors raised concerns about the impact on the Heritage Coast. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: Insufficient supporting information has been supplied to fully consider the impacts of these proposals. Specifically in relation to the cumulative impacts of this submission along with the other proposed renewable energy developments along the River Thaw, the ecological impacts this development will have on this site, and any commitment on grid access. National and local policy promotes renewable energy development in principle and the development management process (either Local Authority or DNS) should be used as a mechanism to assess this site and consider all relevant implications.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
515	Treguff Fach Farm	Llantrithyd	Renewable energy	0	1	0	One comment was received by National Grid on the location of an overhead transmission route. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: Insufficient supporting information has been supplied to fully consider the impacts of these proposals. Specifically in relation to the cumulative impacts of this submission along with the other proposed renewable energy developments along the River Thaw, the ecological impacts this development will have on this site, and any commitment on grid access. National and local policy promotes renewable energy development in principle and the development management process (either Local Authority or DNS) should be used as a mechanism to assess this site and consider all relevant implications.
516	Treguff Farm	Llantrithyd	Renewable energy	0	1	0	One comment was received by National Grid on the location of an overhead transmission route. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: Insufficient supporting information has been supplied to fully consider the impacts of these proposals. Specifically in relation to the cumulative impacts of this submission along with the other proposed renewable energy developments along the River Thaw, the ecological impacts this development will have on this site, and any commitment on grid access. National and local policy promotes renewable energy development in principle and the development management process (either Local Authority or DNS) should be used as a mechanism to assess this site and consider all relevant implications.
517	Ty Draw	Llantrithyd	Renewable energy	0	2	0	Two comments were received by National Grid on the location of an overhead transmission route. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: Insufficient supporting information has been supplied to fully consider the impacts of these proposals. Specifically in relation to the cumulative impacts of this submission along with the other proposed renewable energy developments along the River Thaw, the ecological impacts this development will have on this site, and any commitment on grid access. National and local policy promotes renewable energy development in principle and the development management process (either Local Authority or DNS) should be used as a mechanism to assess this site and consider all relevant implications.
2783	Porthkerry Road, Rhoose (2) (Option 1)	Rhoose	Housing	0	1	1	Representors raised concerns about traffic and poor public transport. Network Rail made comments about the need for mitigation for level crossing risk. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Reduction of the size of original submission (492). The site area has been reduced to only the western part of the site (1.65 ha), to create further distance between built development and the airport runway. Notwithstanding this, the proximity of the site to the operational airport and the likely noise implications are still considered to remain unacceptable.
2798	Porthkerry Road, Rhoose (2) (Option 2)	Rhoose	Housing	0	1	0	Network Rail made comments about the need for mitigation for level crossing risk. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage:

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							Amendment of proposed use of original site (492) from mixed use (housing and commercial) to just housing. The site was previously excluded due to the proximity of the site to the airport runway. Whilst further noise assessment has been undertaken the impact of the runway on amenity is still considered to be unacceptable.
3838	Land at Bridge House Farm (Option A - Housing)	Llantwit Major	Housing	0	0	1	One representor raised concerns about any development on the grounds of coalescence and the impact on the conservation area. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The RLDP strategy indicates that Llantwit Major is in the strategic growth area, but the strategic growth area does not extend to the minor rural settlement of Llanmaes. The site is an area of open countryside located adjacent to the Llanmaes conservation area and there is concern that a development of the scale proposed would have a detrimental impact on the setting of the conservation area. Even with a proposed open space and landscape buffer as part of the development, the development would erode the openness between the settlements and impact on the identity of both settlements. The site has been assessed as part of the green wedge review, where the recommendation was to include the site as a green wedge DNP2 (6).
3867	Land at Bridge House Farm (Option B - Housing and Retail)	Llantwit Major	Housing Led Mixed Use	0	0	1	One representor raised concerns about any development on the grounds of coalescence, the impact on the conservation area, flood risk, traffic, infrastructure capacity and highway safety. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The RLDP strategy indicates that Llantwit Major is in the strategic growth area, but the strategic growth area does not extend to the minor rural settlement of Llanmaes. The site is an area of open countryside located adjacent to the Llanmaes conservation area and there is concern that a development of the scale proposed would have a detrimental impact on the setting of the conservation area. Even with a proposed open space and landscape buffer as part of the development, the development would erode the openness between the settlements and impact on the identity of both settlements. The site has been assessed as part of the green wedge review, where the recommendation was to include the site as a green wedge DNP2 (6). There is a resolution to grant planning permission for a retail foodstore on part of the site, although this is subject to a call-in request for consideration by the Welsh Ministers. If allowed, it will be necessary to show the part of the site proposed for retail use as an allocation in the RLDP.

EAST VALE (PETERSTON-SUPER-ELY, ST NICHOLAS & WENVOE)

Where representations were made on candidate sites that have been allocated in the RLDP, the representations have been attributed to the allocated site, rather than the candidate site.

The table below sets out the number of representations received on each site and a response. Where a candidate site is not included on the list below, this is because no representations were received. Only duly made representations are included.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
381	Land on the north side of Nantywern, Peterston Super Ely	Peterston Super Ely	Housing	0	0	2	Representors raised concerns about the impact on the heritage and character of rural communities, traffic congestion, impact on rural setting, wildlife and biodiversity and the need to prioritise brownfield sites over greenfield development, overdevelopment, flooding and access concerns due to the site's location adjacent to National Trust protected area. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is located within the countryside, away from any settlement. It is, therefore, an unsustainable site that would be inappropriate for residential development, as set out in national planning policy.
387	Land at Culverhouse Cross	Culverhouse Cross	Housing	1	0	1	One representor raised concerns about traffic, road infrastructure and the lack of public transport links. The site promoter (supporting the site) comments that the candidate submission presents a deliverable, sustainable and policy-aligned opportunity to address significant affordable housing need within the Wenvoe housing market area. A scheme of around 50 homes would integrate effectively with the existing built form at the edge of Culverhouse Cross, avoid the need for large-scale urban expansion or major infrastructure investment and maintain the wider strategic function of the surrounding Green Wedge through a contained and well-designed development footprint. Comments are noted. The site has been considered through the candidate site assessment process but has not been taken forward for allocation within the RLDP. The reasons for this are outlined below. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: *"The Predictive ALC Maps indicates that site is Grade 2 and 3a Best and Most Versatile Land. Development of the site would lead to the loss of BMV land contrary to national policy. The proposal is in a green wedge, development would harm the integrity of the Green Wedge Designation and would represent unacceptable intrusion in to the open countryside."* The site was subsequently resubmitted through the second call for candidate sites, with the site amended from a market led to an affordable housing led scheme and a reduction in the number of dwellings, the reasons why the site was discounted at Preferred Strategy remain the same. The site was therefore not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The proposal is in a green wedge, and development would harm the integrity of the Green Wedge Designation and would represent unacceptable intrusion in to the open countryside. The Predictive ALC Maps indicates that site is Grade 2 and 3a 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 in lower agricultural grades is unavailable.
393	Wenvoe Quarry	Wenvoe	Aggregates Recycling	1	0	0	The site promoter (supporting the site) comments that Wenvoe Quarry should be identified by the Plan as a suitable location for residues arising from the treatment of Construction and Demolition Waste (CDW). Such a facility would be a direct replacement for the closed Whitehall site in the Vale and such a development presents a significant opportunity to

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							both improve biodiversity and health and safety through the restoration of the quarries void by importing suitable restoration materials and this should be specifically recognised by the Plan through designation. Council response: The RLDP has not made specific allocations for material recycling facilities, instead relying upon Policy SP17 Sustainable Waste Management to set out the approach to waste management facilities, which would include the treatment and reuse of construction and demolition waste as part of the circular economy. Policy SP17 identifies the types of sites where open-air waste management facilities would be acceptable in principle, and specific reference is given to operational or non-operational mineral working sites as potential locations where they do not conflict with existing or proposed neighbouring uses. The proposals would also need to be considered against Policy WA1 Assessment of Waste Management Proposals on the suitability of locations. However, this reiterates that proposals for waste management facilities that accord with locations set out in Policy SP17 will be favoured. As a non-operational mineral site, Wenvoe Quarry would accord with the policy in principle, subject to meeting other considerations.
437	Swn Y Coed, Wenvoe	Wenvoe	Housing	1	0	0	The site promoter (supporting the site) comments that the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location. It provides an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place. The site benefits from excellent accessibility the local public transport network, active travel routes and local services. As set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available. Any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural Land contrary to national policy. The proposal is in a green wedge and could harm the integrity of the designation. In accordance with PPW (Edition 12), 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 Wenvoe ward that can support the delivery of affordable housing.
441	Land at The Downs	Culverhouse Cross	Affordable housing led	0	0	1	One representor raised concerns about the impact on the environment and the community and the lack of necessary infrastructure to support development of this site. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Site is located within a hamlet outside of the strategic growth area. Whilst it is proposed for small scale affordable housing, The Downs' position within the settlement hierarchy means that it would not be appropriate to accommodate additional growth.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
454	Land at Peterston Super Ely Option 1	Peterston Super Ely	Housing	0	0	1	One representor raised concerns about development in small villages, dangerous access, traffic, lack of consideration for brownfield sites and impact on village character. Development should be placed in existing town and urban areas. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The north eastern parcel of land is located within Flood Zone 2 and therefore subject to a significant constraint. The site would result in the loss of Grade 2 Best and Most Versatile agricultural land, contrary to national policy. Predictive Agricultural Land Classification Map indicates that the sites contained wide areas of grade 2 agricultural land and smaller parcel of grade 3b land. Major Highway constraints identified. The site is located within a Special Landscape Area and development is likely to result in a substantial change in character and/or significant adverse effects on landscape character and visual amenity.
460	Land adjoining The Spinney	St Nicholas	Housing	1	0	0	The site promoter (supporting the site) comments that of all the Candidate Sites within St Nicholas, the Spinney has the least issues raised. The development would have limited impact upon the Conservation Area. Only part of the candidate site is located within the conservation area, and the illustrative site layout has been designed with reference to the Conservation Area Appraisal and Management Plan. The current settlement boundary is illogical as the site is surrounded by development on 3 boundaries and the simple rounding off along the southern boundary would allow for an appropriate windfall infill development. Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan. The Deposit Plan should be amended to allocate the site or alternatively identify it as a reserve or flexibility site, in order to ensure the Plan is justified, effective and deliverable. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area. The Strategy focuses growth in the areas that are most sustainable in terms of both sustainable transport and the availability of employment, services and facilities. Outside of the strategic growth area, small scale affordable housing led development proportionate to the scale of the settlement have been allocated within Minor Rural Settlements where appropriate sites are available, together with re-use of existing buildings and infill opportunities. Part of the site is located within the St Nicholas Conservation Area, and the development would have an adverse impact on the character and setting of the Conservation Area. The current St Nicholas Conservation Area Appraisal and Management Plan, identifies the existing trees on and surrounding the site as a 'Significant Tree Group'. The Appraisal notes that overall the conservation area is very spacious and maintains a strongly rural character. Notwithstanding its impact on the conservation area, the site has not been submitted as a small-scale affordable housing-led development and would therefore fail to accord with the strategy. Furthermore, there is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing. Planning Policy Wales (Edition 12) (PPW), establishes the need for settlement boundaries to identify locations where development would be compatible with national policy, locating development within settlements or on land adjoining them, where appropriate. The Development Plans Manual (DPM) provides guidance in the production of Local Development Plans and states that settlement boundaries must be appropriately drawn; taking into account the aims of the overall strategy and the amount and type of development that is attributed to each tier of the settlement hierarchy. Settlement boundaries are drawn and amended on this basis and to ensure that they follow the logical edge of built development within a town or village. The settlement boundaries have been reviewed in accordance with the methodology set out in Background Paper BP46.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
486	Land to the South of the A48 at St Nicholas	St Nicholas	Housing	1	1	0	The site promoter (supporting the site) comments that St Nicholas performs strongly in the settlements appraisal and both the Adopted LDP and current Deposit Plan recognise the role of minor rural settlements in supporting sustainable communities and the significance of St Nicholas as a village with a primary school serving a wider catchment area. A Heritage Appraisal concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character. The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner. It is considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting. Whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW. The Council's Summary of Assessment should be amended. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: 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 Strategy focuses growth in the areas that are most sustainable in terms of both sustainable transport and the availability of employment, services and facilities. Outside of the strategic growth area, small scale affordable housing led development proportionate to the scale of the settlement have been allocated within Minor Rural Settlements where appropriate sites are available, together with re-use of existing buildings and infill opportunities. The site is identified within the St Nicholas Conservation Area Management Plan as providing significant views within the conservation area and therefore the development would have an adverse impact on the character and setting of the Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Notwithstanding its impact on the conservation area, the site has not been submitted as a small-scale affordable housing-led development and would therefore fail to accord with the strategy. Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural Land contrary to national policy. In accordance with PPW (Edition 12), 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. The methodology by which sites have been assessed is set out in full within Background Paper BP16 — Candidate Site Assessment Methodology. All submitted sites are assessed against a number of criteria, as detailed in BP16, and scored through a Green, Amber, and Red system to determine their perceived suitability for development. It should be noted that this process is not purely quantitative in nature; in appraising sites, officers have applied professional judgement alongside key factual information to arrive at what is considered the most appropriate outcome in respect of each relevant criterion.
490	Land to the north of Pendoylan	Pendoylan	Affordable housing led	1	1	9	Representors raised concerns about the size of development, environmental and rural objectives, significant local opposition, impact on overstretched infrastructure, loss of green belt land, harm to a historic and picturesque village, inadequate access and unsuitable location, environmental and landscape impact, location within a conservation area, the Ely Valley SSSI, traffic congestion and the need for a bypass, brownfield sites along regular transit routes should be considered first, flood risk and drainage, lack of amenities and public transport, prevent school expansion and reduce

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							school places, greenfield land, loss of agricultural (BMV) land, lack of suitable infrastructure and conflict with national planning policies. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Predictive Agricultural Land Classification Map indicates that the site is grade 2 agricultural land and 3b. The site is located within a settlement that contains few services and no public transport, as such residents would be reliant on private transport to access services and facilities.
549	Land at Peterston Super Ely, Option 2	Peterston Super Ely	Housing	0	0	1	One representor raised concerns about the site's location in a flood plain, the size of greenfield development in proportion to the size of the village, limited lane access and the impact on village character. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The north eastern parcel of land is located within Flood Zone 2 and therefore subject to a significant constraint. The site would result in the loss of Grade 2 Best and Most Versatile agricultural land, contrary to national policy. Predictive Agricultural Land Classification Map indicates that the sites contained wide areas of grade 2 agricultural land and smaller parcel of grade 3b land. Major Highway constraints identified. The site is located within a Special Landscape Area and development is likely to result in a substantial change in character and/or significant adverse effects on landscape character and visual amenity.
3836	Land at Culverhouse Cross	Culverhouse Cross	Affordable Housing Led	0	0	1	One representor raised concerns about the road infrastructure and public transport links. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 387. Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 387) and reduction in the number of dwellings, the other reasons why the site was previously discounted still remain. The proposal is in a green wedge, and development would harm the integrity of the Green Wedge Designation and would represent unacceptable intrusion in to the open countryside. The Predictive ALC Maps indicates that site is Grade 2 and 3a 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 in lower agricultural grades is unavailable.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
3854	Land at Bonvilston	Bonvilston	Affordable Housing Led	0	0	1	One representor raised concerns about the impact on the heritage and character of rural communities, traffic congestion, impact on rural setting, wildlife and biodiversity and the need to prioritise brownfield sites over greenfield development. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 385. Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 385), the other reasons why the site was previously discounted still remain. Development of the site would have an adverse impact on the character and setting of the Bonvilston Conservation Area. 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.
3857	Land South of the A48, Bonvilston	Bonvilston	Affordable Housing Led	1	0	0	The site promoter (supporting the site) comments that the site 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. It is considered that the site's classification as BMV agricultural land does not pose a fundamental constraint as the site represents a relatively small parcel with a gross area of 0.88ha which is not capable of beneficial agricultural production due to its limited size. There is also a considerable need for affordable housing, and the site would assist in meeting these local needs. The settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 435. 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. As part of the candidate site assessment process, the Highways Authority was consulted and identified highway constraints affecting the site. 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.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
4073	Land North East of Primary School, Peterston Super Ely	Peterston Super Ely	Affordable Housing Led	0	0	1	One representor raised concerns about the impact on the heritage and character of rural communities, traffic congestion, impact on rural setting, wildlife and biodiversity and the need to prioritise brownfield sites over greenfield development. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led with an amendment to site boundary. Previous site reference 378. The site was previously ruled out as the proposal would lead to the loss of Best and Most Versatile Agricultural Land contrary to national policy. The predictive map identifies that part of the site is classed as Grade 2 Best and Most Versatile agricultural land. A revised site boundary has been submitted which reduces the developable area of the site and therefore the impact on BMV. Further detailed assessment has indicated that there would be a need for a significant stretch of footway to be provided in the interests of highways safety. This would result in the loss of a mature hedgerow, which forms part of the rural character of the area and is important for biodiversity. Any alternative route for the footway would require third party land.

PENARTH AREA

Where representations were made on candidate sites that have been allocated in the RLDP, the representations have been attributed to the allocated site, rather than the candidate site.

The table below sets out the number of representations received on each site and a response. Where a candidate site is not included on the list below, this is because no representations were received. Only duly made representations are included.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
353	Land on the West Side of Cardiff Road, Dinas Powis	Dinas Powys	Housing	1	0	3	Representors raised concerns about flood risk, damage to wildlife, traffic congestion and road safety, population growth, lack of school or GP places, loss of green space, unfulfilled promises in previous developments, increased flood risk, loss of green buffer between communities, further strain on already stretched public services, and damage to local wildlife and the natural environment. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is located within the countryside, away from any settlement. It is, therefore, an unsustainable site that would be inappropriate for residential development, as set out in national planning policy.
354	Brynawel Garden Centre	Penarth	Housing	0	0	4	Representors raised concerns about the loss of a community building, lack of suitable infrastructure, development in the countryside, conflict with RLDP objectives, impact on heritage and rural setting, harmful to the environment and local character, traffic congestion and wildlife and habitat loss. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is located within the countryside, away from any settlement. It is, therefore, an unsustainable site that would be inappropriate for residential development, as set out in national planning policy.
356	Land east of Pen-Y-Turnpike Road, Dinas Powys,	Dinas Powys	Housing	0	0	4	Representors raised concerns about traffic congestion, loss of green space, destroy wildlife habitats, strain existing systems, alternative brownfield sites should be considered over greenfield, conflict with RLDP objectives, impact on heritage and rural setting, unsuitable location, harmful to the environment and local character, impact on a public right of way, lack of access and flood risk. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The proposal is within a Green Wedge and the scale of the proposed development would harm the integrity of the designation. Site access is significantly constrained along Pen-y-Turnpike Rd.
368	Former Cogan Reservoir Site	Llandough	Housing	0	0	3	Representors raised concerns about the lack of a suitable access, significant deterioration in traffic conditions and road safety, loss of green buffer land between communities, increased flood risk, further strain on already stretched public services and damage to local wildlife and the natural environment. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site would significantly affect stepping stones, green networks, or wildlife corridors. Major highway constraints identified, unless the site can be brought forward alongside the adjoining parcel of land, which has planning permission, pending a Section 106 agreement. The site is part of an allocation in the adopted LDP but has not been evidenced as deliverable.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
369	Land South of Cross Common Road, Dinas Powys	Dinas Powys	Housing	0	0	3	Representors raised concerns about flood risk, conflict with RLDP objectives, lack of suitable infrastructure, unsuitable location, impact on heritage and rural setting, harmful to the environment and local character, traffic and road safety, no school or GP provision and no public transport. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The red line boundary includes a large area of land designated as SINCs and ancient woodland. Whilst only the northern part is proposed for built development, with the remainder proposed for identified mitigation, the proposed developable area still includes an area within the North of Pop Hill SINC, which is considered to have ecological value. The site would represent an intrusion into the open countryside.
376	Land West of Swanbridge Road (Phase 3), Sully	Sully	Housing	1	0	4	Representors raised concerns about the heritage coastline, lack of suitable infrastructure, prioritise road infrastructure, education and shops before housing, lack of public transport, school and GP places, biodiversity, conflict with RLDP objectives, traffic congestion, placemaking and phase 1 and 2 have already strained existing services. The site promoter (supporting the site) comments that while parts of the site do constitute BMV land, is otherwise suitable for development. An agricultural assessment prepared by The Andersons Centre suggests that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land. Comments are noted. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy.
400	Land off Penlan Road, Llandough	Llandough	Housing	0	0	4	Representors raised concerns about the local road network capacity, lack adequate travel infrastructure, car-dependency, traffic congestion, destruction of the local green belt, impact on local sites of woodland interest and biodiversity, cumulative impacts of sites around Dinas and Llandough, overdevelopment, impact on ait quality, insufficient local infrastructure, lack of public transport, parking pressures near Llandough Hospital, and flood risk and wildlife impact. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The Preferred Strategy conclusion was that the site should only be allocated if required and less sensitive sites cannot be delivered. Since this time, a planning application has been submitted for residential development on a brownfield site within settlement limits in Llandough (Vale Car Sales) and this is deemed more preferable to meet future housing needs in the area. The site is proposed for 100% affordable housing.
419	Land at The Grange, Pen-Y-Turnpike Road, Dinas Powys	Dinas Powys	Housing	0	0	2	Representors raised concerns about mature trees and wildlife, loss of hedgerows and habitats, agricultural covenant, loss of green space, strain existing infrastructure that is already under pressure, road infrastructure cannot support increased traffic congestion leading to safety issues and pollution, investment and improvements should be proven before planning approval and brownfield should be prioritised over greenfield land. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage:

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							The site is unrelated to the existing built form and would represent sporadic development into the countryside. Site access is significantly constrained along Pen-y- Turnpike Rd with poor pedestrian connectivity. The development is likely to have a significant impact on protected species and wildlife corridors. The proposal is within a Green Wedge and would harm the integrity of the designation.
423	Land North Dinas Powys	Dinas Powys	Housing	0	0	3	Representors raised concerns about flood risk, increased traffic, increased demands on local healthcare, damage to the environment and wildlife and lack of transport links. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is unrelated to the existing built form and would represent sporadic development into the countryside. Site access is significantly constrained along Pen-y- Turnpike Rd with poor pedestrian connectivity.
425	Land at St Andrews Quarry, Dinas Powys	Dinas Powys	Housing	0	0	1	One representor raised concerns about conflict with RLDP objectives, area of outstanding natural beauty and allowing housing there would significantly limit the opportunity to develop it in future to achieve RLDP objectives. It should rather be preserved and taken over for public use to achieve those two objectives. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is located within the countryside, away from any settlement.
428	Land at North East Barry	Dinas Powys/Barry	Housing	0	0	1	One representor raised concerns about conflict with RLDP objectives to protect the environment and enhance placemaking, lack of adequate public transport and active travel infrastructure, car-dependency, traffic congestion, significant infrastructure improvements should be made before any housing, threatens the site's natural beauty, tranquillity and heritage value. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site at North East Barry is under the control of several different land owners. Whilst statements of intent to release the site for development have been received by the Council for a number of the development parcels, as the plan progressed there was a need for further certainty from all parties in the form of appropriate evidence, such as signed heads of terms, demonstrating commitment from the respective landowners that there is a common agreement on the delivery of the site. The Council has actively engaged with the site promoters and landowner representatives throughout the process. However, insufficient evidence has been received in respect of full landowner agreement to give sufficient confidence that a site of the scale originally envisaged can be brought forward within the plan period. Further time spent seeking to resolve these matters would have led to significant delays to the RLDP timetable. Whilst a smaller site involving fewer landowners could potentially have been identified, this would have resulted in a smaller quantum of development that would be unable to support the proposed mix of uses that are deemed critical to the effective placemaking of this site and would have related poorly to the existing settlement pattern. In addition, it would be more challenging to deliver the active travel improvements necessary to reduce the car dependency of the location. Given the issues described above, Land at North East Barry has not been taken forward as an allocation in the Deposit Plan.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
429	Land at Pen y Turnpike Road, NW of Llandough Hospital	Llandough	Housing	0	0	5	Representors raised concerns about loss of wildlife and habitats, strain on local infrastructure, impact on sewage and water systems without upgrades, traffic congestion on narrow, poorly maintained country lane which would cause accidents and pollution, infrastructure issues need to be addressed, brownfield sites should be considered, poor road infrastructure, loss of green space, surrounding ancient woodland, impact on public footpaths and public right of way, lack of public transport links, significant deterioration in traffic conditions and road safety, loss of green buffer between communities, increased flood risk, further strain on already stretched public services and damage to natural environment. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is unrelated to the existing built form and would represent sporadic development into the countryside. Site comprises a SINC and area of high biodiversity value.
431	Land off Caerleon Road, Dinas Powys	Dinas Powys	Housing	0	0	3	Representors raised concerns about increased traffic congestion and road safety, dangerous access, school and GP capacity, unsuitable for development, area already over saturated, no forward planning, loss of green space, wildlife and habitats and brownfield sites should be considered firs. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: Development will significantly affect stepping stones, green networks, or wildlife corridors. The development would impact on the integrity of the green wedge designation. The site was subsequently resubmitted through the second call for candidate sites, and the site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment to the site boundary of 431. The site was originally ruled out on the grounds that it would represent an unacceptable intrusion in to the open countryside and impact on the integrity of the green wedge designation. The green wedge has been reassessed as part of the green wedge review, and it is considered that this remains the case. The site has been put forward for a settlement boundary amendment and is not therefore being considered as an allocation. It has been considered as part of the settlement boundary review, where it was concluded that it was not appropriate to include the site within an amended boundary for Dinas Powys.
434	Land at Pen y Turnpike Road, SW of Llandough Hospital	Llandough	Housing	0	0	2	Representors raised concerns about significant deterioration in traffic conditions and road safety, loss of green buffer land between communities, increased flooding risk, further strain on already stretched public services and damage to local wildlife and the natural environment. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is located within the countryside, away from any settlement. It is, therefore, an unsustainable site that would be inappropriate for residential development, as set out in national planning policy.
443	Land at Caerleon Road, Dinas Powys	Dinas Powys	Housing	0	0	2	Representors raised concerns about flood risk, wildlife and impact on habitats and hedgerows, road safety and dangerous access and increased traffic congestion. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage:

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							The site would represent unacceptable intrusion in to the open countryside and impact on the integrity of the green wedge designation.
444	Land north of Dinas Powys	Dinas Powys	Housing	1	0	2	Representors raised concerns about increased flood risk, increase in cars and traffic congestion, road network is already at capacity, existing infrastructure is insufficient, risks to road safety and local air quality, lack of adequate travel infrastructure, impacts local sites of woodland interest that provide ecological buffers and vital for local biodiversity and the cumulative impacts of sites around Dinas and Llandough represents an overdevelopment. The site promoter (supporting the site) comments that the proposed HG1 KS2 allocation could be further expanded to strengthen the Council's position on housing numbers. The site is capable of delivering a larger mixed-use development and further enhancing the role and function of Dinas Powys. Presents a significant opportunity to enhance local facilities and green infrastructure provision. Although the extended site is also identified within the Cwrt-yr-Ala basin Special Landscape Area, the site is naturally well screen from viewpoints further afield due to vegetation and topography. The Tir Collective Landscape Assessment, as submitted with the Candidate Site, concluded that any development proposals would not result in the coalescence of settlement areas. Part of the site was identified as a key site in the Preferred Strategy and following Full Council approval in September, it has been carried forward into the Deposit RLDP. This relates only to the smaller south eastern part of the site as it remains the position that the remainder of the site is not suitable. The site has been allocated as a Key Site (HG1 KS2 Land north of Dinas Powys). Justification for HG1 KS2 can be found in BP18A, page 67, Candidate Site assessment at Deposit Stage: The site is located adjacent to the Dinas Powys Settlement Boundary, which is in the Strategic Growth Area, so this is a location where sustainable growth should be targeted. Only a smaller parcel of the site, accessed off Cardiff Road, would be acceptable due to landscape and ecology constraints. This smaller site (250 units) would form a logical extension to Dinas Powys and is therefore suitable for further consideration.
450	Hayes Road, Sully	Sully	Housing	0	0	1	One representor raised concerns about conflict with RLDP objectives, the site's location in an area of natural beauty and tranquillity and a loss of green space. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Whilst employment and residential uses exist within the immediate vicinity of the site, these do not form part of a settlement identified in the existing Settlement Hierarchy, or a rural hamlet/small village. The Sully Settlement Boundary exists approximately 325 metres to the east of the site. Resultantly, the site is physically divorced from this and there is no physical relationship between the two. The site has also been submitted for an alternative use (employment) under site reference 452. The suitability of this use is considered separately.
484	Land at Hayes Road, Barry	Barry	Employment	0	0	2	Representors raised concerns about the proximity to the established Ty Hafan estate which requires zero disturbance from building works, increased traffic and footfall, conflicts with RLDP objectives and the site is located within an area of natural beauty and tranquillity. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site falls within an existing local employment site and proposals for this site would be considered against the policies of the adopted LDP or those of the RLDP once adopted.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
2524	The Knole, Pen-Y-Turnpike Road	Dinas Powys	Housing	0	0	1	One representor raised concerns about destroying vital wildlife habitats, straining existing infrastructure which is already under pressure, power, sewage and water systems are inadequate and need upgrades, increased traffic congestion and risks to road safety on narrow, poorly maintained roads which could cause accidents and pollution, planning should only proceed if infrastructure issues are addressed and alternative brownfield sites have been considered not greenfield. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: While the site sits at the edge of the settlement of Dinas Powys providing a range of facilities within an acceptable distance the site is located in the open countryside on a country lane with no footpaths. Therefore, journeys into the centre of Dinas Powys are likely to be made by car with no provision for active travel, contrary to the preferred strategy and national policy.
3840	Holms Farm, Pen-Y-Turnpike Road	Dinas Powys	Housing	0	0	1	One representor raised concerns about conflict with RLDP objectives, increased traffic congestion without infrastructure improvements, should prioritise enhancing transport and infrastructure before housing, the site's location in a natural, tranquil, heritage rural area crossed by a public right of way and threatens the environment and local character. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site faces numerous physical constraints and intrudes significantly on the open countryside and the green wedge between Dinas Powys and Llandough. It is a sporadic development which reflects poorly in respect of the urban form. Furthermore, insufficient evidence has been submitted to demonstrate deliverability.
4067	Land at Pen y Turnpike Road, northwest of Llandough Hospital /Tir yn Pen y Turnpike Road, i'r gogledd-orllewin o Ysbyty Llandochau	Llandough	Affordable Housing Led	0	0	1	One representor raised concerns about destroying wildlife habitats, strain local systems lacking sufficient investment, power, sewage and water supplies are inadequate for increased demand, increased traffic congestion on unsafe and poorly maintained roads which cause accidents and pollutions, development should only proceed if infrastructure issues are addressed, evidence should show that no suitable brownfield sites exist. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 429. The site was originally ruled out on the grounds that it is unrelated to the existing built form and would represent sporadic development into the countryside. The site comprises a SINC and area of high biodiversity value. The identification of the site for affordable housing led development does not change the original reasons for discounting the site.

RURAL VALE (COWBRIDGE, ST BRIDES, LLANDOW & EWENNY)

Where representations were made on candidate sites that have been allocated in the RLDP, the representations have been attributed to the allocated site, rather than the candidate site.

The table below sets out the number of representations received on each site and a response. Where a candidate site is not included on the list below, this is because no representations were received. Only duly made representations are included.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
355	Land West of St Brides Road, Wick	Wick	Housing	0	0	4	Representors raised concerns about conflict with national planning policy and the RLDP's spatial strategy, promoting unsustainable and disproportionate growth, harm to rural character and setting, brownfield should be prioritised or sites located existing urban areas with suitable infrastructure, damage green wedges and green infrastructure, unnecessary countryside development, extension of settlement, lack of services, transport and infrastructure, poor road infrastructure, create significant landscape and visual harm, fails tests of soundness, unjustified by local evidence, no local affordable housing need, drainage and sewage infrastructure is limited, recent growth, greenfield development, The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: The site would represent unacceptable intrusion in to the open countryside. The site is also at a scale that could not be considered as suitable affordable housing led development site. The site was subsequently resubmitted through the second call for candidate sites, and the site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 355. There were two sites deemed suitable for further consideration in Wick - 2814 Land at Heol Fain and this site. The sites are adjacent to each other and have similar characteristics insofar as they are greenfield flat sites adjacent to new build housing. However, it is considered that 2814 Land at Heol Fain better reflects the existing pattern of development in the village and would be a more appropriate rounding off.
362	Land at Moat Farm	Llysworney	Housing	0	0	1	One representor raised concerns about its location in a conservation area, unsuitable highway infrastructure, lack of public transport, harmful to outstanding views and disproportionate to the village. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Development of site will have a detrimental impact on the setting of the conservation area and Moat Farm. The Conservation Area Appraisal and Management Plan (2009) identifies the site has providing important views within the conservation area, and a Moat Farm is identified as a positive building within the conservation area (and identified as a county treasure). The proposal is located within Llysworney that contains few services and facilities, and as such residents would be dependent on private transport to access day to day services and facilities.
363	Land forming part of The Beaupre Estate, St Hilary	St Hilary	Housing	0	0	1	One representor raised concerns about the area and its suitability for housing development, brownfield sites should be prioritised and infill in existing towns and villages. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is located within the countryside, away from any settlement. It is, therefore, an unsustainable site that would be inappropriate for residential development, as set out in national planning policy.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
367	Land South of Llantwit Major Road, Cowbridge	Cowbridge	Housing	2	0	16	Representors raised concerns about the impact on the setting of the Schedule Ancient Monument, potential significant loss of protected trees, special historical setting, loss of agricultural land, brownfield sites should be prioritised, no local need, lack of suitable infrastructure including doctors and schools, area of outstanding natural beauty protected by CADW, intrusion into the countryside, impact to wildlife and habitats, lack of public transport and active travel, harmful to rural character, poor accessibility, loss of green space, location within the Upper & Lower Thaw Valley Special Landscape Area, visual impact, affect of water run-off onto the road, close vicinity to an iron age fort, traffic congestion and increased parking and pollution, dangerous access, pressure on local infrastructure and services, no clear investment in infrastructure, harmful to quality of life and harmful to the natural environment, rural character and setting, Two representors raised support for the site as it is better suited to development as these areas are already partially suburbanised and do not have the unspoilt rural views/space/character that the bryn melin and associated sites do. There is already some development within the area of this site. It is well connected with safe easy walking routes into the town centre, and better developed access to public transport and local amenities. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Development would have a negative impact of on the setting of the Schedule Ancient Monument and potential significant loss of protected trees. It is noted that the following a historic felling of trees, the loss of protected trees would not be a significant constraint. However, it is considered that there is sufficient housing sites allocated and within the existing supply in Cowbridge and a further greenfield extension to the west of the town is not required unless other sites do not proceed.
372	Meurig's Camping and Glamping	Pentre Meyrick	Other proposed use	0	0	1	One representor raised concerns about the narrow and unsuitable access, unsuitable location, traffic congestion and road safety, increased noise, disturbance and loss of privacy and harmful to the amenity and character of the surrounding area. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Site area fails to meet minimum threshold for non-residential development.
373	Cae Efail, Land off Llantwit Rd	Wick	Housing	0	0	2	Representors raised concerns about the areas status in the settlement hierarchy, significant recent housing growth without expansion in services or infrastructure, further development on greenfield land, disproportionate expansion of the village, erosion of rural character, contrary to the principles of sustainable and proportionate growth set out in national planning policy. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The proposal would represent an unacceptable intrusion in to the open countryside.
375	Land at Pentre Meyrick	Pentre Meyrick	Housing	0	0	1	One representor raised concerns about the narrow and unsuitable access, unsuitable location, traffic congestion and road safety, increased noise, disturbance and loss of privacy and harmful to the amenity and character of the surrounding area. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: No initial Development Viability Model submitted – site viability and deliverability unknown.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
380	Land at Trepit Road, Wick	Wick	Housing	0	1	5	Representors raised concerns about its location outside of the existing settlement, unacceptable incursion into the countryside, narrow and dangerous access, traffic congestion, flood risk, poor links, conflict with national planning policy and RLDP's spatial strategy, promoting unsustainable and disproportionate growth, harmful to rural character and setting, brownfield land should be prioritised or land near existing urban areas and suitable infrastructure, damage to green wedges and green infrastructure, unnecessary countryside development, extension of settlement, lack of services, transport and infrastructure, lack of suitable road infrastructure, create significant landscape and visual harm, fails tests of soundness, significant recent housing growth, and disproportionate expansion of the village. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site would represent unacceptable intrusion in to the open countryside, with the proposed development boundary arbitrarily drawn to sub divide a larger greenfield site.
383	Land at Nant Canna, Treoes, Option 1	Treoes	Housing	0	0	9	Representors raised concerns about the lack of local need, traffic congestion and road safety, poor infrastructure and facilities, access roads are narrow and dangerous, would reduce the buffer between existing housing and the new data centre, increased noise, light and environmental pollution, impact on the quality of life, scale of development, flood risk, lack of public transport and active travel connections, lack of accessibility to services, conflict with RLDP objectives, located in a Special Landscape Area, local schools and GP/dentist services are already oversubscribed, sewage and drainage infrastructure, lack of safe pavements, rural location, reliance on private vehicles, and the scale of development. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Site is outside of the strategic growth area and is not proposed for small scale affordable housing led development within a minor rural settlement. Treoes scores poorly in the Settlement Appraisal Review and it is considered Treoes is not a sustainable settlement that could accommodate additional limited growth. The site also would result in loss of grade 3a BMV land, contrary to national policy.
386	Land at Hazelwood, Ogmore By Sea	Ogmore By Sea	Housing	0	0	4	Representors raised concerns about the damage to village character, lack of necessary infrastructure and facilities to support expansion, increased population will place unsustainable pressure on local services, schools and medical services already overstretched, dangerous access road, increased traffic congestion and road safety, impact of affordable housing, existing road infrastructure is poor and loss of green spaces. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: The development would represent unacceptable intrusion in to the open countryside. The site was subsequently resubmitted through the second call for candidate sites, and the site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 386. 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.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
389	Land at Three Golden Cups	Southerndown	Housing	0	0	4	Representors raised concerns about the damage to village character, lack of necessary infrastructure and facilities to support expansion, increased population will place unsustainable pressure on local services, schools and medical services are already stretched beyond capacity, conflict with regional development plan strategy, loss of community facility that supports tourism and benefits local businesses, harmful to area of outstanding natural beauty, sewage, flooding, increased noise, traffic, litter, located on a watercourse, alternative locations available and will deprive future generations. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: Following a review of the adopted LDP settlement hierarchy Southerndown has been re categorised from a minor rural settlement to a rural hamlet and therefore no longer within the settlement hierarchy. The proposal would therefore be contrary to the RLDP strategy. The site was subsequently resubmitted through the second call for candidate sites, and the site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 389. Following a review of the adopted LDP settlement hierarchy Southerndown has been re categorised from a minor rural settlement to a rural hamlet and therefore no longer within the settlement hierarchy. A proposal for affordable housing led development would still be contrary to the RLDP strategy.
391	Land off Wick Road, Ewenny, Option 1	Ewenny	Housing	0	0	2	Representors raised concerns about poor road infrastructure and connectivity, unsuitable for housing development, would require further destruction of habitats, damage the village character, narrow roads and increased traffic congestion, schools at capacity and undelivered services. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The scale of the proposal would represent an unacceptable intrusion into the countryside and would result in a negative visual and landscape impact on the village's rural setting.
398	Land to north and west of westwinds business park, Llangan	Fferm Goch	Housing	2	0	2	Representors raised concerns about the impact on character and views, increased traffic congestion and road safety, lack of facilities, public transport or active travel links, surrounded by countryside, reliance on private vehicles and lack of local shops. The site promoter (supporting this site) made comments about the exclusion of parts of this site from the settlement boundary. It is deemed suitable for inclusion as it lies immediately to developed areas, local amenities and the adopted highway and therefore would round off the settlement in a logical manner. It would not propose back land development and is considered to be in line with the RLDP strategy and methodology of BP46 that ensure that settlements are drawn to logical defensible boundaries. Photo evidence provided shows the parcel displays characteristics that are not necessarily associated with open countryside and is regularly maintained. Designation as part of the SLA does not preclude its inclusion. It would allow for a small windfall opportunity in the future that is critical in sustaining the vitality of minor rural settlements. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that:

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							Site is outside of the strategic growth area and is not proposed for small scale affordable housing led development within a minor rural settlement. 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 25 dwellings. The site adjoins the existing settlement of Fferm Goch and is located between and existing residential area and Westwinds Business Park. The site was subsequently resubmitted through the second call for candidate sites, and the site was allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led and amendment to site boundary. Previous site reference 398. The site has been allocated as an affordable housing led site HG4 (4). Of the two submitted sites in Fferm Goch, site 2671 Land North of West Winds Business Park is located between an established small business park and existing residential development and as such would be considered as an infill development. The other site, 4068 Land adjacent to Llangan Primary School, is located to the south of Fferm Goch and would result in an extension to the settlement in a linear pattern. Both sites have submitted viability evidence to demonstrate that they are viable, albeit the evidence for 4068 is based on the delivery of 30 units, which exceeds the policy requirement of 25 units as set out within the plan strategy. Neither site is designated as BMV land and both sites are broadly comparable in terms of distance to the services and facilities within Fferm Goch. However, as site 2671 has a better relationship with existing settlement pattern and accords with the 25-unit threshold set out in the policy, it is considered that this site would be the most appropriate to allocate. The Council notes that there is additional land within the site promoter's ownership that could be included to extend the site. This larger site was submitted through the candidate site process (398) and ruled out as it did not accord with the plan strategy but was resubmitted with a smaller site area in the second call for sites for an affordable housing led development. The inclusion of the additional area would increase the capacity beyond would be considered to be a small-scale extension to the settlement. An extended boundary would also be illogical and would not reflect the existing pattern of development in the settlement.
401	Land to the west of Fferm Goch House, Llangan	Fferm Goch	Housing	0	1	9	Representors raised concerns about loss of agricultural land and green space, lack of local public transport or active travel connections, schools at capacity, lack of facilities, road safety and speeding, no local need for additional housing, unacceptable loss of rural landscape, impact on views, increased traffic congestion, loss of wildlife and habitats, loss of biodiversity and hedgerows, local infrastructure cannot sustain expansion, lack of accessibility to local services such as medical facilities, shops and community facilities, conflict with RLDP objectives, located in a Special Landscape Area, scale of development, reliance on private vehicles, dangerous and narrow access, conflict with the RLDP's sustainable growth strategy, poorly related to settlement pattern, risks fragmented expansion, threatens the landscape, countryside and settlement character, placemaking quality, infrastructure capacity, deliverability, insufficient justification and the potential cumulative impacts. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site would represent unacceptable intrusion in to the open countryside. The site would result in loss of grade 3a BMV land contrary to national planning policy. The site is also at a scale that could not be considered as a suitable affordable housing led development site.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
402	Land adjacent to LLangan Primary School, LLangan	Fferm Goch	Housing	0	0	11	Representors raised concerns about loss of agricultural land and green space, lack of local public transport or active travel connections, schools at capacity, poor and dangerous road infrastructure, road safety and speeding, proximity to the school creates unacceptable highway safety risks, increased traffic congestion, no capacity, loss of rural landscape, impact on health and well-being, destruction of rural character, cumulative impact, unsustainable, undermines RLDP objectives, scale of development would be disproportionate to settlement size and infrastructure capacity, lack of employment opportunities, lack of accessibility to services such as medical facilities, shops and community facilities, located in a Special Landscape Area, reliance on private vehicles, dangerous and narrow access, unsustainable location, surface water and poor drainage, flood risk, harmful to the local countryside and habitats, proximity to school prevents its expansion, conflict with RLDP strategy, harmful to landscape and settlement character, fails to support high-quality placemaking, uncertain deliverability and consideration for alternative sites. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: Whilst it is adjacent to Llangan Primary School, the site is located outside of the defined settlement of Fferm Goch and is not therefore considered a sustainable location for further development. The site was subsequently resubmitted through the second call for candidate sites, and the site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 402. There were two submitted sites in Fferm Goch for affordable housing led development. Site 2671 Land North of West Winds Business Park is located between an established small business park and existing residential development and as such would be considered as an infill development. This site, 4068 is located to the south of Fferm Goch and would result in an extension to the settlement in a linear pattern. It is considered that the other site has a better relationship with the settlement pattern.
403	Land east of Llangan	Llangan	Housing	0	0	20	Representors raised concerns about the loss of green belt land in close proximity to a conservation area, change the nature of the area, harmful to existing residents, limited services, infrastructure and public transport, unsustainable location, reliance on private vehicles, contrary to national and local planning policies, significant growth already, undermines RLDP objectives, scale of affordable housing appears disproportionate, affordable housing need should be addressed through a distributed model across sustainable settlements, flood risk identified by Natural Resources Wales, lack of amenities, school at capacity, increased traffic congestion on narrow and dangerous roads, road safety, strong local opposition, not reasonably accessible to services such as medical facilities, shops and community facilities, located within a Special Landscape Area, loss of agricultural land, damage to the countryside and hedgerow habitats, conflict with local character, increased pollution, sewage and drainage infrastructure would need substantial upgrades, lack of active travel connections, conflict with RLDP's sustainable growth strategy, poorly related to existing settlement patterns, fails to deliver high-quality placemaking, insufficient justification, cumulative impacts and landscape erosion. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: The site is unrelated to the settlement of Llangan and would represent unacceptable intrusion in to the open countryside. Llangan is not a settlement identified within the RLDP/Adopted LDP settlement hierarchy and as such development would be contrary to the growth strategy.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							The site was subsequently resubmitted through the second call for candidate sites, and the site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 403. The original site was ruled out as the site was considered to represent an unacceptable intrusion in to the open countryside. Llangan is not a settlement identified within the settlement hierarchy and as such development would be contrary to the growth strategy. This would apply for market housing and an affordable housing led scheme.
405	Land at Waun Gron, Ystradowen	Ystradowen	Housing	0	0	1	One representor raised concerns about the lack of adequate public transport, unsustainable and unsupported by infrastructure, reliance on private vehicles, narrow rural road network, increased traffic congestion and risks to road safety, local schools at capacity with no plan for additional places, lack of sufficient play areas, medical provision or community infrastructure, erosion of rural character and conflict with sustainability and climate objectives. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site would represent unacceptable intrusion in to the open countryside and would result in the loss of Grade 2 agricultural land which would be contrary to national policy.
409	Land adjacent to Waterton Lodge, Colwinston	Colwinston	Housing	1	0	3	Representors raised concerns about the lack of infrastructure to support development, intrusion into the open countryside, climate change, no indication of market or affordable led inclusion, no DVM supplied, no active travel, loss of BMV land, no suitable site access, no key services, facilities or public transport. The site promoter (supporting the site) has commented that the site is located adjacent to the existing settlement and is well related to the current built form. Development in this location would represent a logical and contained extension to the village, rather than an isolated incursion into open countryside. The site directly adjoins existing dwellings at Waterton Lodge and mature boundary hedgerows; development here would constitute rounding-off rather than isolated sprawl. A strong landscape framework already exists, and additional planting could reinforce defensible boundaries. No evidence highway assessment has been published by the Authority. A preliminary review confirms that safe vehicular access can be achieved from the adjoining local highway with modest engineering works and that the scale envisaged would generate limited traffic, well within local-road capacity. The site lies within walking distance of core facilities. Development at a scale that represents proportionate growth for Colwinston can be provided and would be entirely consistent with the “limited expansion” envisaged for minor rural settlements under PPW and the RLDP. The land is semi-improved grassland with no statutory designations. Preliminary review indicates no SINC coverage or protected species constraints. Detailed ecological and agricultural-land surveys can be provided to confirm that any residual impacts are minor and capable of full mitigation. Development can achieve net biodiversity gain through buffer planting, sustainable drainage and native-hedgerow reinforcement, fully consistent with PPW and RLDP environmental objectives. The site is available and deliverable early in the plan period. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site would represent unacceptable intrusion in to the open countryside and is affected by major highways constraints. As part of the candidate site assessment process, the Highways Authority was consulted and identified highway constraints affecting the site. The Highways Authority raised significant concerns regarding the access arrangement, visibility, geometry and pedestrian facilities and is unlikely to support this site in the future.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							The site is located within a minor rural settlement, and the scale of the proposal would be greater than that supported by the preferred growth strategy of the Replacement LDP. The site is also at a scale that could not be considered as a suitable affordable housing led development site. The Strategy focuses growth in the areas that are most sustainable in terms of both sustainable transport and the availability of employment, services and facilities. Outside of the strategic growth area, small scale affordable housing led development proportionate to the scale of the settlement have been allocated within Minor Rural Settlements where appropriate sites are available, together with re-use of existing buildings and infill opportunities. An affordable housing-led site has been identified in Colwinston which will provide 25 units and a deliver a minimum of 50% affordable housing to meet the housing needs of the local community.
411	Argoed Isha Quarry	Llansannor	Minerals	1	0	0	The site promoter (supporting the site) has commented that the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked. Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: 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. Notwithstanding this, Argoed Isha is specifically referenced in Policy MIN3 as a Dormant Reserve where a prohibition order will not be served, and paragraph 3.396 of the supporting text stages "*It is considered that the reserves at Argoed Isha Quarry, Llansannor, could be reworked in the future subject to a new scheme of workings*." It is explained in Background Paper BP25 on Minerals that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The site is therefore not available in the short to medium term, but the plan provides sufficient flexibility to allow future minerals workings to progress should circumstances change later in the plan period.
430	Land at Ystradowen	Ystradowen	Housing	0	0	2	Representors raised concerns about the lack of adequate public transport provision, unsustainable and unsupported by infrastructure, reliance on private vehicles, narrow rural road network, increased congestion and risk to road safety, local schools at or near capacity with no plans for additional places, lack of sufficient play areas, medical provision or community infrastructure, erosion of rural character and conflict with sustainability and climate objectives. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: 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 site was subsequently resubmitted through the second call for candidate sites, and the site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage:

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							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.
438	Land to the South of Church Rd, Llanblethian	Cowbridge	Housing	0	0	10	Representors raised concerns about the site's unsustainable location, not conveniently situated for walking, cycling or public transport accessibility, further pressures on extremely limited public transport, unsuitable road infrastructure, ongoing nearby development, unacceptable intrusion into the countryside, impact on ancient settings, previously rejected at Preferred Strategy, topography, increased traffic congestion and risk to road safety, loss of green space and harm to surrounding landscape, increased pollution and strain on existing infrastructure, lack of suitable pavements or lighting, schools insufficient to support further developments, harmful to the natural environment and historic rural character, priority should be given to brownfield sites and more appropriate alternatives. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site would represent unacceptable intrusion in to the open countryside. The site is located on the outskirts of Cowbridge and not conveniently situated for walking cycling and public transport accessibility.
440	Land North of Church Road, Llanblethian	Cowbridge	Housing	0	0	10	Representors raised concerns about the site's unsustainable location, not conveniently situated for walking, cycling or public transport accessibility, further pressures on extremely limited public transport, unsuitable road infrastructure, ongoing nearby development, unacceptable intrusion into the countryside, impact on ancient settings, previously rejected at Preferred Strategy, topography, increased traffic congestion and risk to road safety, loss of green space and harm to surrounding landscape, increased pollution and strain on existing infrastructure, lack of suitable pavements or lighting, schools insufficient to support further developments, harmful to the natural environment and historic rural character, priority should be given to brownfield sites and more appropriate alternatives. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site would represent unacceptable intrusion in to the open countryside. The proposal would have an adverse impact on the setting of a nearby ancient schedule monument.
448	Land at Llandow Airfield	Llandow	Housing	4	1	0	There was support for this site from residents who considered this to be a preferable alternative site to developing greenfield sites. The site promoter also made representations of support, noting that the size of the site falls outside the scope of the RLDP but could be considered as part of the Strategic Development Plan. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Whilst development exists on site and adjoins it to the north and south, this is associated with the Llandow Trading Estate and Vale Enterprise Park. The Sigingstone Settlement Boundary exists approximately 750 metres to the east of the site and the Llandow Settlement Boundary exists approximately 1.2km to the north west. There is no functional relationship between the proposed candidate site and either of these. Therefore, and fundamentally, as the site is not within or adjoining a settlement boundary, it is considered to be an inappropriate site for residential development, as set out in national planning policy. Due to its scale, as well as the number of dwellings and services proposed, the candidate site could be considered a new settlement. As set out in paragraph 3.52 of Planning Policy Wales (Edition 11), due to their strategic nature, significance, and impacts extending beyond a single local authority, new settlements should only be proposed as part of a joint LDP, an SDP or Future Wales. Given that the Replacement LDP is a standalone

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							development plan for the Vale of Glamorgan it would be contrary to national policy to consider the candidate site submission as a new settlement as part of this process.
453	Land to the East of Colwinston	Colwinston	Housing	0	0	1	One representor objected to this larger site (in addition to the smaller site that has been allocated under HG4.1) due to impact on the countryside, loss of BMV land and impact on character. The site was originally submitted during the first call for candidate sites and considered unsuitable for further consideration. At Preferred Strategy stage, it was concluded that: The site would represent unacceptable intrusion in to the open countryside. The site is located within a minor rural settlement, and the scale of the proposal would be greater than that supported by the preferred growth strategy of the Replacement LDP. The site is also at a scale that could not be considered as a suitable affordable housing led development site. The site was subsequently resubmitted through the second call for candidate sites, and the site was allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 453. The site has been allocated as an affordable housing led site HG4 (1). The site was previously discounted as it was considered that it would represent unacceptable intrusion in to the open countryside. The site is located within a minor rural settlement, and the scale of the proposal would be greater than that supported by the preferred growth strategy of the Replacement LDP. The site is also at a scale that could not be considered as a suitable affordable housing led development site. The site was resubmitted for affordable housing led with a smaller site area. This site better accords with the existing pattern of development and would be acceptable in terms of the strategy. The 2023 LHMA indicated that the ward of Llandow has a need for 50 additional affordable units over the next 15 years. There are no suitable sites in Colwinston that are completely unaffected by a BMV designation. However, in terms of the search sequence set out in the policy, the allocation of site 4069 would result in the loss of significantly less BMV land in total. The site also relates better to the existing built form.
455	Land North of Primrose Hill	Cowbridge	Housing	3	0	2	Representors objected on the grounds of traffic congestion, impact on the gateway to Cowbridge, damage to the countryside, natural environment and historic rural character, pressure on local infrastructure and greenfield development. Others supported it as a better site than allocation HG1.6 Land at St Athan Road. The site promoter (in support of the site) considered that the site should be allocated as insufficient land is allocated in Cowbridge. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage:

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
							The site would represent unacceptable intrusion in to the open countryside. Development is likely to result in a substantial change in character and/or significant adverse effects on landscape character and visual amenity.
464	Land opposite St David's Church in Wales Primary School	Colwinston	Housing	5	0	2	The representors objecting to the site raise concerns that it is agricultural land, Colwinston has limited services and poor access. Those supporting the site consider that it is in an appropriate location opposite a school, would support the village and sustain services and would deliver affordable housing. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site was resubmitted as an affordable housing led site (reference 3834). However, another site, Land east of Colwinston, was also submitted as an affordable housing led site. As explained in section 5, it is only deemed appropriate to allocation one site in Colwinston and the other site, east of Colwinston has been taken forward as it is a stronger relationship to the existing built form. Site 464/3834 is located opposite a primary school but as it is segregated from the main part of Colwinston by the road, Furthermore, the site is almost entirely within an area of BMV which the Predictive Maps show to be Grade 3a. An Agricultural Land Classification Survey has been prepared and submitted. This has been validated by Welsh Government who confirmed that it was prepared to an acceptable standard and confirmed all 1.4 Ha to be Grade 3. In contrast, only the southern-most part of 4069 Land to the East of Colwinston is BMV – approximately 2% Grade 2, and 17% Grade 3a. Paragraph 3.59 of Planning Policy Wales states "Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1, 2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade."
468	Land to the south of Llangan Primary School	Fferm Goch	Affordable Housing Led	0	0	6	The representors raised concerns about the proximity to a school, poor public transport and a lack of facilities and infrastructure. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Whilst it is adjacent to Llangan Primary School, the site is located outside of the defined settlement of Fferm Goch and is not therefore considered a sustainable location for further development.
474	Land at Colwinston	Colwinston	Housing	0	0	3	Representors raised concerns about the lack of infrastructure, loss of BMV land, deliverability and a lack of facilities in Colwinston. The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: No initial Development Viability Model submitted – site viability and deliverability unknown.
475	Beggars Bush - Land off (East of) St Athan Road	Cowbridge	Housing	0	0	5	Representors raised concerns about the impact on the Special Landscape Area, highway safety and biodiversity. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: No initial Development Viability Model submitted – site viability and deliverability unknown.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
511	Old Beaupre Farm	St Hilary	Renewable Energy	0	1	0	One comment was received by National Grid on the location of an overhead transmission route. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Insufficient supporting information has been supplied to fully consider the impacts of these proposals. Specifically in relation to the cumulative impacts of this submission along with the other proposed renewable energy developments along the River Thaw, the ecological impacts this development will have on this site, and any commitment on grid access. National and local policy promotes renewable energy development in principle and the development management process (either Local Authority or DNS) should be used as a mechanism to assess this site and consider all relevant implications.
512	Pant Wilkin Stables	Aberthin	Renewable Energy	0	0	4	Representors raised concerns about the loss of agricultural land, biodiversity, drainage and traffic The site was not allocated for the reasons set out in BP18 Candidate Site Assessment at Preferred Strategy stage: Insufficient supporting information has been supplied to fully consider the impacts of these proposals. Specifically in relation to the cumulative impacts of this submission along with the other proposed renewable energy developments along the River Thaw, the ecological impacts this development will have on this site, and any commitment on grid access. National and local policy promotes renewable energy development in principle and the development management process (either Local Authority or DNS) should be used as a mechanism to assess this site and consider all relevant implications.
513	St Hilary Farm	St Hilary	Renewable Energy	0	1	0	One comment was received by National Grid on the location of an overhead transmission route. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Insufficient supporting information has been supplied to fully consider the impacts of these proposals. Specifically in relation to the cumulative impacts of this submission along with the other proposed renewable energy developments along the River Thaw, the ecological impacts this development will have on this site, and any commitment on grid access. National and local policy promotes renewable energy development in principle and the development management process (either Local Authority or DNS) should be used as a mechanism to assess this site and consider all relevant implications.
514	Land East of St.Athan Road	Cowbridge	Affordable Housing Led	0	0	3	representors raised concerns about the suitability of the access, infrastructure capacity, impact on biodiversity, loss of green space and the impact on a Special Landscape Area. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The development of this site would be an arbitrary incursion into the countryside in this location. Development will significantly affect stepping stones, green networks, or wildlife corridors.
555	Land off Vale Court, Cowbridge, Vale of Glamorgan	Cowbridge	Housing	0	0	2	Representors raised concerns about the suitability of the access, infrastructure capacity, impact on biodiversity and a loss of green space. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The development of this site would be an arbitrary incursion into the countryside in this location.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
565	Land at Nant Canna, Treoes, Option 2	Treoes	Housing	0	0	4	The representors raise concerns about traffic, a lack of public transport and poor access to facilities, and education capacity. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Site is outside of the strategic growth area and is not proposed for small scale affordable housing led development within a minor rural settlement. Treoes scores poorly in the Settlement Appraisal Review and it is considered Treoes is not a sustainable settlement that could accommodate additional limited growth. The site also would result in loss of grade 3a BMV land, contrary to national policy. An amended site was resubmitted at the second call for sites stage with a revised use (affordable housing led). See 3837
2782	Pantiles Field, Colwinston	Colwinston	Affordable Housing Led	5	0	3	The representors objecting to the site raise concerns that it is agricultural land, Colwinston has limited services and poor access. Those supporting the site consider that it is in an appropriate location opposite a school, would support the village and sustain services and would deliver affordable housing. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: The site is promoted for a small-scale affordable housing led development in a minor rural settlement, the principle of which would accord with the strategy. Colwinston has limited services and facilities, but does have a primary school, village hall, pub and small shop. A bus route is available approximately 1km away, but access is via country lanes with no footway. This site is on the edge of the settlement and its development would not relate well to the existing pattern of development in Colwinston. It would be considered an unacceptable incursion into the countryside.
3834	Land Opposite St Davids Church in Wales Land Opposite St Davids Church, Colwinston	Colwinston	Affordable Housing Led	6	0	2	The representors objecting to the site raise concerns that it is agricultural land, Colwinston has limited services and poor access. Those supporting the site consider that it is in an appropriate location opposite a school, would support the village and sustain services and would deliver affordable housing. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led and amendment to site boundary. Previous site reference 464. The site is almost entirely within an area of BMV which the Predictive Maps show to be Grade 3a. An Agricultural Land Classification Survey has been prepared and submitted. This has been validated by Welsh Government who confirmed that it was prepared to an acceptable standard and confirmed all 1.4 Ha to be Grade 3a. In terms of the search sequence set out in PPW another affordable housing led site in Colwinston (4069) would result in the loss of significantly less BMV land in total and also relates better to the existing built form so this has been allocated instead.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
3837	Land at Nant Canna, Treoes	Treoes	Affordable Housing Led	0	0	4	The representors raise concerns about traffic, a lack of public transport and poor access to facilities, and education capacity. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 565. The original site as ruled out as it is outside of the strategic growth area and is not proposed for small scale affordable housing led development within a minor rural settlement. Treoes scores poorly in the Settlement Appraisal Review and it is considered Treoes is not a sustainable settlement that could accommodate additional limited growth. The site also would result in loss of grade 3a BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land in lower agricultural grades is unavailable. Whilst the site has been resubmitted for an affordable housing led development, the other reasons for ruling out the site remain.
3855	Land at Ogmore by Sea	Ogmore by Sea	Affordable Housing Led	1	0	1	One representor raised concerns about a lack of infrastructure and highway safety. The site promoter (in support of the site) considers that it should be allocated as it is suitable and deliverable and is within a 22-minute bus journey of key services and facilities. It would not have any detrimental impact on the Heritage Coast and represents a sustainable location. Accordingly, the Council's assessment and scoring should be updated. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 386. 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. The methodology by which sites have been assessed is set out in full within Background Paper BP16 — Candidate Site Assessment Methodology. All submitted sites are assessed against a number of criteria, as detailed in BP16, and scored through a Green, Amber, and Red system to determine their perceived suitability for development. It should be noted that this process is not purely quantitative in nature; in appraising sites, officers have applied professional judgement alongside key factual information to arrive at what is considered the most appropriate outcome in respect of each relevant criterion.
3856	Three Golden Cups Campsite	Southerndown	Affordable Housing Led	0	0	2	The representors raise concern due to the impact on the Heritage Coast and tourism. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 389. Following a review of the adopted LDP settlement hierarchy Southerndown has been re categorised from a minor rural settlement to a rural hamlet and therefore no longer within the settlement hierarchy. A proposal for affordable housing led development would still be contrary to the RLDP strategy.

Site ID	Site Name	Settlement	Proposed Use	Support	Comment	Object	Response
4057	Land east of Llangan	Llangan	Affordable Housing Led	0	0	5	The representors raise concern due to impact on a conservation area, flood risk, highway safety, impact on character, a lack of infrastructure and biodiversity. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 403. The original site was ruled out as the site was considered to represent an unacceptable intrusion in to the open countryside. Llangan is not a settlement identified within the settlement hierarchy and as such development would be contrary to the growth strategy. This would apply for market housing and an affordable housing led scheme.
4059	Land West of St Brides Road	Wick	Affordable Housing Led	0	0	5	The representors raise concern due to environmental impacts such as flooding, sewerage capacity, noise and light pollution, as well as traffic and infrastructure capacity. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 355. There were two sites deemed suitable for further consideration in Wick - 2814 Land at Heol Fain and this site. The sites are adjacent to each other and have similar characteristics insofar as they are greenfield flat sites adjacent to new build housing. However, it is considered that 2814 Land at Heol Fain better reflects the existing pattern of development in the village and would be a more appropriate rounding off.
4060	Land at Ystradowen	Ystradowen	Affordable Housing Led	1	0	0	The site promoter considers that the site should be allocated as it would deliver affordable housing and is a sustainable, deliverable and acceptable site. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: 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.
4068	Land adjacent to Llangan Primary School	Fferm Goch	Affordable Housing Led	0	0	2	The representors raised concerns about the proximity to a school, poor public transport and a lack of facilities and infrastructure. The site was not allocated for the reasons set out in BP18A Candidate Site Assessment at Deposit Stage: Amendment of proposed use from housing to affordable housing led. Previous site reference 402. There were two submitted sites in Fferm Goch for affordable housing led development. Site 2671 Land North of West Winds Business Park is located between an established small business park and existing residential development and as such would be considered as an infill development. This site, 4068 is located to the south of Fferm Goch and would result in an extension to the settlement in a linear pattern. It is considered that the other site has a better relationship with the settlement pattern.

ANNEX 12 – APPENDICES, BACKGROUND PAPERS, GREEN INFRASTRUCTURE STRATEGY AND HEALTHY PLACEMAKING SPG

APPENDICES

Representations have been made on Appendices 1, 2 and 3.

APPENDIX 1 – HOUSING TRAJECTORY

6087 – Barratt Redrow Homes (Lichfields) - Comment

The RLDP housing trajectory shows a significant increase in delivery from about 200 dwellings per annum in 2025-26 and 2026-27 to approximately 1,000 dpa from 2027/28 to 2030/31. To achieve this, more available sites should be allocated in sustainable settlements, specifically land at Primrose Hill in Cowbridge, which can provide up to 220 dwellings at 50 per year. Including Primrose Hill in the RLDP would help ensure the plan's delivery and meet the third soundness test.

Council Response

Candidate Site 455, Land North of Primrose Hill, has been excluded from the RLDP process for reasons set out in BP18A Candidate Sites Assessment at Deposit Plan Stage. The site would represent unacceptable intrusion into the open countryside. Development of the site is likely to result in a substantial change in character and/or significant adverse effects on landscape character and visual amenity.

6709 – Persimmon Homes (Asbri Planning)

Deposit Plan Appendix 1 - Housing Trajectory KS1
The identified delivery timescales and quantum of units for the site as set out at Appendix 1 of the Deposit Plan (as copied below) are agreed with and considered to be suitable/deliverable.

Persimmon Homes are committed to the delivery of the allocation, in accordance with the phasing trajectory outlined in the Deposit Plan. Further to the detailed submissions previously made, including extensive viability evidence which has been discussed in detail with the Local Authority and their viability consultant, it is confirmed that the site is viable and deliverable in accordance with the identified delivery timescales. It should be noted that there is a possibility that the number of units to be delivered within the first year (2028-2029) could be increased slightly, however, it is considered that the above presents a realistic trajectory for the site.

Council Response

The Council welcomes the support and confirmation from Persimmon Homes regarding the allocation of Land at North West Barry (KS1). It is noted that the developer agrees with the identified delivery timescales, quantum of units, and phasing trajectory set out in Appendix 1 (Housing Trajectory) of the Deposit Plan.

APPENDIX 2 – INFRASTRUCTURE DELIVERY

5128 – Welsh Government (Planning Division)

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.

Council response

The comments are noted. The RLDP is supported by an extensive evidence base including an Infrastructure Delivery Plan (BP44) and Housing Land Supply and Housing Trajectory Paper (BP9A), which set out the timescales for delivery and the infrastructure requirements. The Council welcomes the Welsh Government's acknowledgement of the work done to date.

In respect of impacts on the trunk road network, the Council has undertaken a Strategic Transport Assessment (BP14 and BP14A) which utilises the South East Wales Transport Model (SEWTM). M4 Junction 34 (Miskin) was identified as a strategic junction and was assessed to consider the forecast effects of strategic housing allocations on its operation using the SEWTM data. It was concluded that the impact would be negligible (0.4% increase in the AM peak and 0.5% in the PM peak). This is not surprising given the distance of the site

from RLDP housing allocations. It is recognised that there is an employment site located in close proximity to the junction. The recent planning application was supported by a Transport Assessment.

The Council intends to progress work on Statements of Common Ground with key site promoters as part of the Examination process.

6710 - Persimmon Homes (Asbri Planning) - Object

Deposit Plan Appendix 2 – Infrastructure Delivery Plan

A number of amendments to the text are requested in regard to the infrastructure requirements for KS1 North West Barry as set out within the Infrastructure Delivery Plan at Appendix 2 of the Deposit LDP.

Suggested Changes

Within the 'Key site issues and constraints' section of the Infrastructure Requirements table, the following amendments to the text are considered necessary:

• **Proportionate** access and junction arrangements on to the A4226 and a financial contribution towards strategic highway network enhancements **(in the context of the impact of wider committed developments on the strategic highway network).**

As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development, and that additional committed developments, which would have a greater impact on the strategic highway network, are considered in the round.

• Previous desk-based assessment and site visits identified that development would have a major impact on five features, including important hedgerows which form historic boundaries. Archaeological features were also identified.

The above bullet point requires clarification as to the 'five features' which the development would have a 'major impact' upon. It should be noted that masterplanning work to date has been informed by extensive survey and assessment work which ensures that the proposed development is capable of addressing all constraints.

Within the section of the table where 'broad costs' of key infrastructure requirements are outlined, it is considered that the following amendments to the text are necessary:

• Education – Estimated Cost ~~Circa £3,730,000~~ **(£TBC)**

It is considered that an estimated cost for education contributions cannot be specified at this stage, as the contribution will be directly related to current school capacity figures at the

time of the Planning Application, with school capacities being fluid and subject to change. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

• A **proportionate** contribution towards on-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highways network where necessary **(in the context of the impact of wider committed developments on the strategic highway network).**

• VOGC to deliver improvements to junctions on the Strategic Highways Network using s106 contributions **(from the North West Barry Key Site and other relevant commitments).**

As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development.

• Contribution towards off-site sustainable transport measures ~~in the area~~ **as necessary and related to the Key Site.**

The requirement for a contribution towards off-site measures 'in the area' is not specific enough to provide certainty for the developer, and it will be important to ensure that any off-site measures are necessary and directly related to the North West Barry development.

Community Facilities ~~– Circa £665,000~~ **(£TBC)**

It is considered that an estimated cost for community facility contributions cannot be specified at this stage – no background calculations are provided to evidence that this estimate is robust. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

Council Response

It is a key planning principle that any Section 106 contributions must meet statutory tests, specifically that they should be proportionate, necessary and related to a site. As this is a statutory requirement, it is not considered that it is necessary to add this into the wording of the policy.

The Council accepts that baseline school capacities and community facility needs may be subject to change and exact calculations will be confirmed at the formal planning application stage. However, removing all cost references in favour of 'TBC' creates unnecessary ambiguity in the LDP evidence base. The costs identified are based on the most up to date information on a per pupil/per dwelling basis and have been factored into the viability testing for the site. These costs are labelled as 'estimated costs' and there is recognition that this may be subject to change.

APPENDIX 3 – MONITORING FRAMEWORK

6588 – Councillor Stephen Haines - Comment

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

Council Response

The LDP monitoring framework covers monitoring indicators for sustainable transport, retail and community infrastructure (including open space).

Sustainable transport indicators monitor the delivery of proposed active travel routes, proposed public transport improvements and proposed highways improvements. The number of sustainable transport schemes secured via S106 planning contributions is also monitored. The representor suggests adding an indicator to monitor sustainable transport modal share (i.e. the percentage of total trips made by different types of transport). Establishing a bespoke, continuous primary data collection for modal share across the Vale of Glamorgan is beyond the scope and resources of the RLDP monitoring process, but the current proposed framework effectively tracks the plan's contribution toward national active travel and public transport targets.

Regarding monitoring indicators for retail, the framework already includes the monitoring of retail floorspace capacity provision as identified in Policy SP12, alongside the annual tracking of commercial property vacancy rates within retail centres. Furthermore, it measures the annual number of retail units lost to non-retail and town centre uses contrary to Policy RCS1, as well as the percentage of hot food takeaways present in town, district, local, and neighbourhood centres in accordance with Policy RCS3 (Hot Food Takeaways). Retail provision delivery is therefore already comprehensively proposed to be monitored within the RLDP monitoring framework.

Open space delivery is monitored through the Community Infrastructure monitoring. This includes monitoring the amount of additional open space provided annually in accordance with policy CI1 Open Space Provision, and the amount of public open space loss to development annually contrary to Policy CI3.

Regarding 'infrastructure phasing compliance', the proposed RLDP monitoring framework includes monitoring indicators that track the annual amount of S106 secured for the delivery

of infrastructure, the delivery of new schools and burial land, the provision and protection of public open space, and the provision and protection of community facilities.

Furthermore, the Infrastructure Delivery Plan (IDP) sets out the specific infrastructure requirements. These requirements can form the baseline for negotiating legally binding Section 106 (S106) agreements and planning conditions during the development management process. Phasing is directly enforced through occupation triggers within the S106 agreements, and the delivery of infrastructure against housing trajectories is actively tracked through the Council's ongoing S106 monitoring procedures.

7226 – Squires - Comment

The Plan does not clearly explain how progress will be monitored or how changes will be made if things do not go as planned. For example, if housing delivery is slower than expected or infrastructure is delayed, there is little information on how allocations or policies would be adjusted.

Council Response

The Monitoring Framework for the RLDP is set out in Appendix 3, containing specific indicators, targets, and triggers for action across key policy areas, such as housing delivery.

In accordance with Welsh Government legislation, the Council is required to submit an Annual Monitoring Report (AMR) to the Welsh Government by 31st October each year following adoption. The AMR assesses whether policies are operating as intended, tracks the rate of housing completions against the trajectory schedule, and monitors the delivery of key infrastructure items.

Site allocations and development policies cannot be altered or adjusted on an informal or ad-hoc basis in response to monitoring targets being missed, outside of the formal plan review process. For example, if monitoring demonstrates a persistent shortfall in housing delivery that breaches defined trigger thresholds, this will initiate a formal LDP Review (short-form or full review, as appropriate).

BACKGROUND PAPERS

As part of the evidence base for the RLDP, the Council published a series of Background Papers. Respondents had the opportunity to make comments on the content of the background papers as part of the Deposit RLDP consultation.

The following Background Papers received duly made comments during the consultation:

- BP9A - Updated Housing Land Supply and Trajectory
- BP14A – Strategic Transport Assessment (Stage 2)
- BP15 – Renewable Energy Assessment
- B21 – South East Wales Strategic Flood Consequences Assessment (Stage 1)
- BP22 – Older Persons Housing Strategy
- BP23A – Best and Most Versatile Agricultural Land
- BP25 – Minerals
- BP25A – Minerals Statement of Sub-Regional Collaboration
- BP27 – Green Wedges
- BP30 – Welsh Language
- BP31 – Open Space
- BP44 – Infrastructure Plan
- BP46 – Settlement Boundary Review

BP9A - UPDATED HOUSING LAND SUPPLY AND TRAJECTORY

A total of 5 representations were received on the housing trajectory, raising concerns that the timescales and delivery rates are not realistic and there is too great a resilience on large sites.

INDIVIDUAL RESPONSES

<u>COMMENTS/OBJECTIONS</u>

7039 – Marion Morgan (Geraint John Planning Ltd) – Object
7139 – Peter Stone Properties (Geraint John Planning Ltd) – Object
7161 – Wig Fach Property Company (Geraint John Planning Ltd) – Object

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 are 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.

Council Response

The timescales identified have been agreed with the individual site promoters. This has included consultation with the Housing Stakeholder Group, as required by the Development Plans Manual, which is evidenced in BP9A. The front-loading of evidence as part of the RLDP preparation process will enable a considerably quicker decision-making process at the planning application stage, as the key issues will have been considered through the masterplanning process.

The Development Plans Manual states that *"Housing trajectories should include a steady flow of housing sites through the plan period and should not be unduly loaded towards the end of the plan period."*

Whilst it is recognised that the first third of the plan period has a lower level of completions, this reflects actual completions rather than forecasts. The remainder of the trajectory demonstrates an appropriate distribution of units across the rest of the plan period. It is unrealistic to expect completions to be evenly distributed throughout the remaining years; however, the trajectory clearly indicates a steady supply of housing that is not unduly concentrated towards the end of the plan period.

As identified in the Schedule of Changes, there is a need to update the Plan to ensure that the housing land supply figures are based on the latest available data. This includes incorporating the results of the most recent housing monitoring survey (2025/26). The Focused Changes document highlights that there will be consequential amendments to the trajectory, as the 2025/26 period will now reflect actual completions rather than anticipated completions.

As part of the latest housing monitoring process, the Council has also engaged with site promoters to confirm whether their original site-specific forecasts remain realistic. In addition, changes have been made to the capacity of two allocations (HG1.1 and HG1.2),

which will need to be reflected in the trajectory. In light of this further engagement and these factual updates, an updated version of the housing trajectory should be provided.

Proposed Change

Update the housing trajectory to reflect updates site capacities and update information on forecast completions.

7064 – Barratt Redrow Homes (Highlight Planning) – Object

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.

Council response

The timescales identified have been agreed with the individual site promoters, as required by the Development Plans Manual, including Barratt Redrow Homes themselves.

The Council does not consider the proposed build rates to represent a significant step change in delivery. Similar levels of site-specific completions have been achieved on a number of major sites within the Vale in the past, including developments delivered by the Barratt Redrow group. It should also be noted that the annual delivery figures comprise both market and affordable housing. Given that allocated sites are required to provide 30-40% affordable housing, open market sales are only needed for approximately 60-70% of the units delivered.

Furthermore, concerns raised regarding delivery rates during discussions with the Housing Stakeholder Group were expressed by planning consultants representing interests that do not have sites allocated within the RLDP, rather than by the housebuilders responsible for delivering the allocated sites.

The Council does not agree that there is an excessive reliance on key sites, as only 25% of the total housing provision is expected to be delivered on these sites. These allocations have been subject to robust assessment and have undergone an enhanced placemaking process, supported by extensive evidence demonstrating their deliverability.

7065 – Barratt Redrow Homes (Highlight Planning) – Object

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.

Council response

The comment is noted. The assumptions have been derived in consultation with the Housing Stakeholder Group and in collaboration with the site promoters and are considered to be robust and appropriately evidenced.

BP14A - STRATEGIC TRANSPORT ASSESSMENT (STAGE 2)

Three duly made representations were received in respect of Background Paper BP14A on the Strategic Transport Assessment (Stage 2). One representation was an objection and the remainder were comments. The main issues raised are regarding junction capacity, traffic data and methodology, phasing of housing and infrastructure delivery, and travel policies. The reps are summarised below and full Council response to the issues is set out.

4720 - Pattenden – Comment

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.

Council response

The concern regarding the relationship between new housing development and transport infrastructure capacity is recognised. It is acknowledged that unmanaged growth can place pressure on the highway network and potentially contribute to congestion, with associated economic and environmental effects. The planning system has a key role in ensuring that necessary infrastructure improvements are delivered alongside new housing development.

However, planning obligations can only be sought where they are necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. Whilst appropriate mitigation will be secured where necessary, it would not be appropriate to delay development to allow for transport infrastructure improvements that are not directly related to the development itself.

In relation to the suggestion that a Dinas Powys bypass should be included in the RLDP, the Council does not consider this to be appropriate. Although a bypass proposal formed part of a previous development plan, it is not included in the adopted Local Development Plan 2011–2026. While a bypass could potentially address some through-traffic movements, it would not directly resolve the primary congestion constraints at Merrie Harrier and Barons Court, which are the principal capacity issues identified in the transport evidence.

The RLDP identifies three significant new active travel routes under Policy TR1, which will provide opportunities for modal shift. In addition, the Council will continue to secure

Section 106 contributions from new housing developments towards sustainable transport improvements.

6367 - Longley – Comment

There is a need to fix the safety issue at the Merrie Harrier junction.

Council response

The Merrie Harrier junction has been assessed as part of the Strategic Transport Assessment (STA). The STA recognises that the Merrie Harrier and Baron's Court junctions are existing congestion locations. Technical Note 6 identifies that both junctions are forecast to operate over capacity in the 2036 Base scenario, before the addition of RLDP strategic housing traffic. When the cumulative impact of the RLDP sites is added, both junctions remain significantly over capacity. The STA concludes that no strategic highway mitigation is required at these junctions as part of the RLDP, because large-scale localised highway mitigation would be disproportionate to the additional impact arising from the RLDP strategic housing allocations. The STA identifies that the strategic focus for these locations should be on wider sustainable transport network improvements, which would require regional support and coordination.

5616 - Atter - Objection

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 roundabout and VOG are still building in the surrounding areas before improvements are made.

Council response

The Strategic Transport Assessment sets out the data sources, modelling assumptions and assessment methodology used to assess the transport implications of the Deposit RLDP. The assessment utilises, and builds upon, the Transport for Wales South East Wales Transport Model.

The STA considers two principal forecast scenarios. The 2036 Base scenario includes forecast background traffic growth, derived from TEMPro/NTEM, which takes account of changes in population, households, employment, car ownership and economic activity. The 2036 RLDP scenario then adds traffic associated with the strategic housing allocations so that the cumulative impact of those sites can be identified and assessed against the future-year baseline.

This approach means that a robust allowance for wider growth associated with employment and other land uses is captured within the future-year background traffic forecasts. The strategic housing allocations are then tested separately to identify their specific cumulative effect on the strategic highway network and to establish where mitigation is required.

The methodology of the STA is set out clearly in BP14 Stage 1 and BP14A Stage 2. This includes Technical Note 5, which explains the strategic modelling methodology, Technical Note 6, which presents the detailed junction capacity modelling, Technical Note 7, which identifies mitigation requirements, and Technical Note 8, which sets out the cost estimation and funding mechanism.

The STA identifies that mitigation is required to address the cumulative impact of the RLDP strategic housing allocations. Policy TR1 therefore identifies improvements to the roundabout as part of the transport infrastructure required to support the Plan. Further detailed Transport Assessments will also be required at planning application stage for individual developments to confirm site-specific access arrangements, detailed traffic impacts and any necessary mitigation.

BP15 – RENEWABLE ENERGY ASSESSMENT

One representation was received welcoming the Renewable Energy Assessment as it relates to BMV land but also noting the potential for more clarification.

STATUTORY CONSULTEE RESPONSE

5172 – Welsh Government (Planning Division) – Comment

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.

Council response

The Dear Chief Planning Officer (DCPO) letter of 1st March 2022 states that "*where BMV land is identified within a proposed solar PV array development, considerable weight should be given to protecting such land from development.*" Whilst the Renewable Energy Assessment (BP15) does not specifically reference this letter, it does reference current best practice, which is to avoid BMV land. It is not therefore considered necessary to specifically include reference to the letter in the background document.

The comments in respect of solar and wind opportunities are noted.

BP21 - SOUTH EAST WALES – STRATEGIC FLOOD CONSEQUENCE ASSESSMENT (STAGE 1)

Nine representations were received on the Strategic Flood Consequences Assessment (SFCA) Background Paper. NRW agreed with the SFCA but requested that any future updates referenced Natural Flood Management schemes. Concerns were raised by respondents about the need for flood alleviation in Llanmaes, and a further representation raised concerns about the accuracy of the document, particularly in reference to previous flooding in Dinas Powys.

STATUTORY CONSULTEE RESPONSE

6675 – Natural Resources Wales – Comment

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).

Council response

The Council welcomes NRW's agreement with the scope of the Strategic Flood Consequences Assessment (SFCA).

An Addendum to the Stage 1 SFCA has been undertaken which summarises a number of initiatives relevant to natural flood management, nature based solutions and wider working with natural processes specifically within the Cadoxton area. This includes reference to the Natural Flood Management Scheme in the Cadoxton catchment, which is currently being progressed by Coed Cadw and NRW. This will provide multiple benefits, mainly to 'slow the flow' and reduce flood risk downstream at Dinas Powys.

Criterion 10 of Policy SP16 on Climate Change Mitigation and Adaption references the requirement for new development to suitably control surface water run-off through the application of sustainable drainage systems and nature based solutions. Nature based solutions are also referenced in the supporting text for the green infrastructure policy. It is not considered necessary to reference specific schemes in the policy as there will likely be a number of schemes delivered in the plan period that are not known about at this current time, but the high level policy framework is supportive of this.

The Addendum has been shared with NRW who concluded in a later dated 7th July 2026 that "*We welcome Section 4 which relates to natural processes and natural flood management, and presents a summary of the Nature Based Solutions and Natural Flood Management Schemes within the Cadoxton river catchment. This satisfies the previous comments we*

made on this aspect within our previous response (ref: CAS-297522-L5K4, dated 11th March 2026).”

INDIVIDUAL RESPONSES

COMMENTS/OBJECTIONS

5814 – P Garvey – Comment

There is a need for flood alleviation in Llanmaes.

Council response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation.

6209 – Arnold – Comment

There is obviously 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.

Council response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation.

6240 – Barry and Vale Friends of the Earth – Object

The statutory Section 19 report on the 23 Dec 2020 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.

Council response

Following comments received during the consultation and the subsequent publication of updated climate change allowances by Welsh Government, the Council commissioned JBA to prepare an addendum to the Stage 1 SFCA to include an update on matters including

an update to the historic flooding mapping commentary included in the Stage 1 SFCA, including clarification of the data sources used and recognition that the December 2020 Dinas Powys flood event is not fully represented within the current NRW Recorded Flood Extent dataset.

The Addendum details the following:

"As part of the original commission, JBA provided mapping to support the Stage 1 SFCA using the best publicly available information at the time. The historic flood extent mapping in question was derived from the NRW Recorded Flood Extent dataset, which identifies areas where flooding has been recorded historically. In Dinas Powys, this dataset shows some localised historic flood extents, but it does not fully represent the recorded extent of flooding associated with the December 2020 event and instead primarily reflects an earlier event.

Following receipt of the consultation comments, the relevant NRW dataset was reviewed again. At the time of writing this addendum, the extent of the December 2020 flooding in Dinas Powys is still not comprehensively captured within the currently available NRW Recorded Flood Extent mapping. For that reason, the Stage 1 SFCA mapping has not been redrawn by JBA. Instead, this addendum clarifies the limitation of the mapping and signposts to the more detailed evidence available within the Section 191 [sic] *flood investigation report for Dinas Powys, which records flood extents for Brookside, Mill Road, Greenfield Avenue, Elm Grove Place and St Cadoc's Avenue.*

The previous reference to Storm Dennis as the cause of the December 2020 flooding was incorrect. The December 2020 Dinas Powys flood event followed a short, intense rainfall event on 23 December 2020 and was not associated with Storm Dennis, which occurred in February 2020. This addendum therefore corrects the historic event description used in the SFCA evidence base."

The addendum also provides an update on a number of initiatives relevant to natural flood management, nature based solutions and wider working with natural processes specifically within the Cadoxton area. This includes reference to the Natural Flood Management Scheme in the Cadoxton catchment, which is currently being progressed by Coed Cadw and NRW. This will provide multiple benefits, mainly to 'slow the flow' and reduce flood risk downstream at Dinas Powys.

The Addendum has been shared with NRW who concluded in a later dated 7th July 2026 that "*We welcome Section 4 which relates to natural processes and natural flood management, and presents a summary of the Nature Based Solutions and Natural Flood Management Schemes within the Cadoxton river catchment. This satisfies the previous comments we made on this aspect within our previous response (ref: CAS-297522-L5K4, dated 11th March 2026)."*

6337 – Leach – Comment

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.

Council response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed

the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation.

7028 – Pocock – Comment

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.

Council response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation.

7236 – N Harris – Comment
7239 – J Harris – Comment

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.

Council response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation.

Flooding relating to overload of the public foul sewerage network is a matter for DCWW to consider and resolve as appropriate.

7237 – J Garvey – Comment

Llanmaes Village currently suffers from flooding and a flood alleviation scheme is desperately needed.

Council response

The Council remains committed to the schemes that have previously received planning permission (application reference 2021/01082/RG3). However, a detailed review of the scheme's economic appraisal undertaken in 2024/25, following significant increases in construction tender costs, concluded that the proposed flood alleviation scheme for Llanmaes was no longer economically viable. As a result, the Welsh Government removed the scheme from its Flood and Coastal Erosion Risk Management (FCERM) Capital Funding Programme. Consequently, delivery of the scheme is no longer within the Council's control through the RLDP process, and its allocation within the RLDP would not secure its implementation.

BP22 - OLDER PERSONS HOUSING STRATEGY

One duly made representation was received in respect of Background Paper BP22 on the Older Persons Housing Strategy. The representation was in support of the background paper. The rep is summarised below and full Council response is set out.

5693 – Barnaby - Support

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.

Council Response

The support and comments are noted.

BP23A - BEST AND MOST VERSATILE AGRICULTURAL LAND

One duly made representations was received in respect of Background Paper BP23A on the Best and Most Versatile Agricultural Land. The main issues raised are regarding the loss of Best and Most Versatile Agricultural Land. The rep is summarised below and full Council response is set out.

5176 - Welsh Government (Planning Division) - Comment

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.

Council Response

The support and comments are noted.

BP25 - MINERALS

Two representations were submitted in respect of Background Paper BP25 - Minerals. These representations consist of one support and one comment. The main issues raised are regarding the Argoed Isha quarry's status in the RLDP. The reps are summarised below and full Council response is set out.

7134 – Tom Prichard (Holdings) Ltd (Highlight Planning) - Support

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.

Council Response

The support is noted.

7135 – Tom Prichard (Holdings) Ltd (Highlight Planning) - Comment

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.

Council Response

The Council agrees with the underlying principle of the representation, that the training use permitted until 2030 is temporary and therefore interim in nature, and does not permanently sterilise or preclude the future reworking of usable mineral reserves on the site.

However, an amendment to BP25 to include the term "interim use" is not considered necessary. BP25 already explicitly states that the site is subject to a *"temporary planning consent until 2030"* (paragraph 5.51) while also noting that usable reserves remain.

The existing reference to a temporary planning permission already conveys the interim nature of the consent. Adding *'interim use'* would not provide any additional policy clarity in this instance.

BP25A – MINERALS STATEMENT OF SUB-REGIONAL COLLABORATION

One representation was submitted in respect of Background Paper BP25A – Minerals Statement of Sub-Regional Collaboration. The main issues raised were regarding the need for clarity as to the status of a Statement of Sub-Regional Collaboration (SSRC). The rep is summarised below and full Council response to the issues is set out.

5175 – Welsh Government (Planning Division) - Comment

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.

Council Response

The primary purpose of this document is to establish strategic collaboration across the sub-region, confirm agreement on LPA apportionments, and outline how regional mineral requirements are managed collectively.

The Position Statement (BP25A) explicitly sets out how regional aggregate provision and local shortfalls are being addressed across the Cardiff City Sub-Region.

As identified in RTS2 (and the Welsh Government policy clarification letter), the Vale of Glamorgan possesses 18.73 million tonnes (mt) of permitted crushed rock reserves against a 25-year apportionment requirement of 17.05mt. Existing permitted reserves therefore exceed the required provision, meaning no new mineral allocations are required in the RLDP.

As shown in Table 2.1 of BP25A, the Vale of Glamorgan, Caerphilly, Bridgend, Merthyr Tydfil, and Brecon Beacons NP have sufficient permitted reserves to meet/exceed their 25-year apportionments without needing any new site allocations. Cardiff Council accepted its apportionment shortfall (7.475mt) and confirmed that site extensions (such as Taffs Well Quarry) and operator proposals within its boundary are being progressed to meet its requirement. RCT's initial shortfall was subject to an appeal determination regarding Craig-yr-Hesg Quarry, which has since been approved to permit additional extraction, overcoming the shortfall.

Paragraph 3.10 of BP25A outlines that in the event an authority cannot make an allocation to address its shortfall, the SSRC process provides the mechanism to effectively transfer apportionment collaboratively to neighbouring LPAs within the same sub-region.

To conclude, the Position Statement confirms that sub-regional demand for crushed rock can be fully met across the Cardiff City Sub-Region. The Council will continue to engage through the South Wales Regional Aggregates Working Party (SWRAWP) to update sub-regional monitoring and formalise any future iterations of the RTS and SSRC as LDP examinations progress across the sub-region. Should an LPA demonstrate an inability to meet its apportionment through local allocations in the future, the SSRC Position Statement will be updated to formally transfer and absorb apportionment across the sub-region.

BP27 – GREEN WEDGES

One representation was submitted in respect of Background Paper BP27 on Green Wedges. The representation was in support of the background paper. The rep is summarised below and full Council response to the issues is set out.

SUPPORT

4893 – Green - Support

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.

Council Response

The support is noted.

BP30 - WELSH LANGUAGE

One representation was submitted to the Deposit RLDP consultation in respect of the Welsh Language. This was submitted by the Welsh Government and the main issues related to the overall limited references to the Welsh language within the Plan, the absence of any mechanism or policy framework to support the growth of the Welsh language and the lack of cross referencing to the authority's Welsh Language Strategy or to the aims of Cymraeg 2050: A million Welsh-speakers. The rep is summarised below and full Council response to the issues is set out.

5179 – Welsh Government (Planning Division) - Comment

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.

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?

Council response

The Council notes the concerns raised by Welsh Government (WG) regarding the limited reference to the Welsh language within the Deposit RLDP and the perceived absence of a clear policy framework, including reference to the Council's own Welsh Language Strategy and Cymraeg 2050: A million Welsh Speakers, the Welsh Government's long-term strategy to achieve one million Welsh speakers by the year 2050.

The Council recognises the importance of the Welsh language as part of the social and cultural fabric of Wales and considers that the Replacement Local Development Plan (RLDP) has been prepared in accordance with the relevant legislative and policy framework, including, Planning Policy Wales (Edition 12), Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017), The Well-being of Future Generations (Wales) Act 2015; and Cymraeg 2050: A Million Welsh Speakers, which require a proportionate, evidence-based approach to Welsh language considerations within the RLDP having regard to local linguistic circumstances, the scale and location of development, and the likely nature of impacts.

The Council's local policy context includes its Welsh Language Promotion Strategy 2022–2027 and the Welsh in Education Strategic Plan (WESP) 2022–2032, both of which provide the primary mechanisms for promoting and supporting the use of the Welsh language at a local level. These documents are referenced in the RLDP evidence base, specifically in the Welsh Language Background Paper (BP30 refers). However, it is noted that the references are not also referenced in the Deposit Plan itself. It is therefore proposed that additional references to these documents should be included in the policy context section (Chapter 2) of the Deposit RLDP.

The RLDP is supported by an Integrated Sustainability Appraisal (ISA) which integrates and fulfils the duties and requirements of Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and the Well-being of Future Generations (Wales) Act 2015 (WBFG).

As evidenced in Background Paper BP30 – Welsh Language, the Vale of Glamorgan is not identified as a linguistically sensitive area within national planning policy terms. According to the 2021 Census, Welsh language use within the county remains below the national average, although the Vale of Glamorgan was one of only four local authorities that saw an increase in the number of Welsh speakers between the 2011 and 2021 Censuses.

Therefore, while the Council notes the WG's concern regarding a WLIA for the Plan, the Council considers that a standalone WLIA is not required. While the ISA recommends that stipulations are added to the Deposit Plan including a specific policy on the Welsh language, the Council considers that in the context of the background evidence such an approach is not supported.

However, as detailed in the background paper, the Plan acknowledges its statutory duty to consider the Welsh language and has embedded relevant provisions within broader thematic policies to ensure compliance with national targets and guidance. These include commitments to sustainable placemaking, cultural identity, and community infrastructure, which collectively support opportunities for Welsh language use across the Vale of Glamorgan. This approach reflects WG guidance, which does not mandate a WLIA in all circumstances, but rather

requires authorities to justify their approach based on a proportionate, evidenced based approach.

WG have made comments specifically on key site allocation KS1 HG1 - Land at North West Barry and the fact that there is no specific monitoring of the impact of housing developments on Welsh Medium schools.

Barry is the largest settlement in the Vale of Glamorgan, with a population exceeding 50,000 residents and the adopted RLDP strategy, directs a significant proportion of growth to Barry as a sustainable urban centre. However, Barry is characterised by a comparatively lower proportion of Welsh speakers relative to other areas of the Vale where Welsh language use is already below the national average. In this context, the Council would suggest that scale of the proposed development, with 376 dwellings, represents a modest and proportionate level of growth relative to the size and function of Barry and that the allocation is not capable of materially altering the linguistic composition of the town given the already low level of Welsh language use.

Notwithstanding this, in order to address this concern, as Policy SP13 specifically references Welsh language facilities, the monitoring framework could be used to establish any changes in the number and proportion of children attending Welsh medium education. It is therefore proposed that a new monitoring indicator be included as part of the monitoring framework for SP13.

Proposed changes

In the policy context section include references to Cymraeg 2050: A million Welsh-speakers, the Vale of Glamorgan Welsh Language Promotion Strategy and the Welsh in Education Strategic Plan (WESP) 2022–2032

Include a new monitoring indicator for Policy SP13 to monitor the proportion of children attending Welsh Medium schools

BP31 - OPEN SPACE

Two representations were submitted in respect of Background Paper BP31 – Open Space. These representations consist of two objections. The main issues raised are regarding audit data, misclassified land, the geographic scale of the assessment, and data verification. The reps are summarised below and full Council response is set out.

5685 - Barnaby - Object

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.

Council Response

Golf courses are included in the calculation for 'Outdoor sports facilities' within the Council's open space audit, as recommended by Technical Advice Note (TAN) 16. However, the Council recognises that golf courses are not always available for public uses by the wider community and constitute a very large proportion of green spaces as recognised in paragraph 8.47 of the background paper. Therefore, Table 7 of the paper includes calculations of the outdoor sports facilities with, and without, the inclusion of golf courses and their total areas.

BP31 states that school playing fields have been included in the assessment as schools may let them out for use by different community groups and clubs. However, this is not always the case with all school playing fields and is down to the discretion of the school itself on whether they allow the facilities to be used by other groups or keep it for school use only. Therefore, while school playing fields have been included in the study, it is recognised that access may be restricted to some school fields and facilities and their inclusion is intended to provide an indication of overall provision.

5066 - Perry - Object

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!

Council Response

Cemeteries and churchyards can provide tranquil green spaces with high amenity value as outlined in TAN 16 and included in its typology of open space. This value is echoed in the background paper identifying their importance for biodiversity and nature and recognising these spaces may be the only or one of very few open spaces within a whole village or hamlet. It is therefore considered that these spaces should remain considered in the open space assessment. This is also applicable to the inclusion of the Cardiff Natural Burial Meadow as an open space where many would spend time in a natural and tranquil setting.

The open space audit and background paper is intended to capture a comprehensive picture of all open space within the Vale, including spaces that may require admission charges or privately managed facilities, in order to give a complete baseline assessment. This has included spaces such as school playing fields, country parks and gardens with fees, and play spaces behind alley gates. While not necessarily open at all times or accessible for all, they still play a role in contributing towards open space across the Vale that residents use.

In respect of land with housing permissions or allocations, the Council agrees that these areas of land should not constitute open space in the background paper and audit and therefore should not contribute towards ward provision. The dataset will be reviewed for any approved housing permissions on existing open space that will be subsequently removed. This will include removal of the two areas identified by the respondent – one in Llancarfan (Site 779 – 0.13 Ha) and one in Bonvilston (Site 505 – 0.05 Ha). Due to the small site of both sites, the reclassification of these sites would not change the overall conclusions on provision in the St Nicholas and Llancarfan ward.

The Council acknowledges that ward boundaries do not always reflect functional catchment areas of open spaces, as noted in the case of the St Nicholas and Llancarfan ward. The ward level analysis is intended to provide a consistent and comparable baseline across the local authority area with updated population figures. It is not intended to suggest all open space within a ward is equally accessible to all residents of that ward, the ward base level is deemed suitable for calculating provision across typologies across the Vale, however

provision at the settlement basis will be considered and accounted in how the background paper and provision policies are applied.

Proposed change

Review BP31 to ensure that areas of open space that are no longer available due to planning applications for alternative uses are removed.

Remove site 779 and site 505, both in the ward of St Nicholas and Llancarfan from the BP31 calculation and make any consequential changes to the calculations.

BP44 – INFRASTRUCTURE PLAN

3 representations were submitted in respect of BP44 – Infrastructure Plan. The reps are summarised below and full Council response to the issues is set out.

The statutory consultee responses from Natural Resources Wales have been addressed first.

The key issues raised include the need for a detailed infrastructure policy covering all sites and specific ecological requirements, alongside criticisms that the Infrastructure Delivery Plan lacks detail regarding sewerage, treatment capacity, surface water diversion, and protection for local bathing water quality.

STATUTORY CONSULTEE RESPONSES

6645 – Natural Resources Wales (NRW)

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.

Council Response

The infrastructure requirements of housing sites are set out in Appendix 2 of the RLDP and also within BP44 Infrastructure Plan. It is not considered necessary to repeat requirements within a plan policy for those sites that are not key sites.

6653 - Natural Resources Wales (NRW)

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.

Council response

Support for the requirement for updated ecological assessments is welcomed. For completeness, it is proposed that the list of evidence required to support a planning application be amended to highlight that there may be a need for protected species surveys, the exact nature of which will need to be determined in consultation with the Council's ecologist.

The reference to the inclusion of buffer zones for watercourses would not be relevant for the other key sites as these are not in close proximity to watercourses. The key site policy text for the other key sites also reference the need to retain green infrastructure assets on the site, so it is not considered necessary for additional wording to be included.

Proposed change

Expand bullet point on list of evidence required to support a planning application in Appendix 2 as follows:

There will be a requirement for up to date ecological appraisals and protected species surveys to be prepared, the exact scope of which will need to be determined in consultation with the Council's ecologist at the time of application. Should the surveys identify evidence of protected species, a detailed masterplan will need to demonstrate the retention, provision and enhancement of essential areas for protected species.

INDIVIDUAL RESPONSES

6799 – Barry & Vale Friends of the Earth

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)?

Council Response

Regarding the first point which focuses on paragraph i of the Executive Summary, this paragraph simply provides a high-level summary of the purpose and scope of the Infrastructure Delivery Plan (IDP) Background Paper. Site-specific infrastructure requirements, including sewerage infrastructure, are set out in Appendix B (Infrastructure Requirement for Housing Allocation) of the IDP. This appendix has been prepared in direct consultation with key stakeholders including Dwr Cymru Welsh Water (DCWW).

Paragraph 3.104 of the IDP sets out the baseline policy and technical requirements for managing surface water and foul drainage arising from new development allocations. New developments are required by national planning policy to separate foul and surface water at source, with surface water managed on-site via Sustainable Drainage Systems (SuDS). The

approval and implementation of SuDS mechanisms for new schemes fall under the statutory remit of the Council's SuDS Approving Body (SAB).

While the Council works in direct consultation with Dwr Cymru Welsh Water (DCWW) on strategic infrastructure planning, retrofitting measures to divert existing highway drainage out of the public sewerage system fall under DCWW's broader operational remit and statutory Drainage and Wastewater Management Plans (DWMPs), rather than within the scope of site-specific allocations in the RLDP IDP. No change to the document is required.

Paragraph 3.105 of the IDP provides an overarching explanation of how local sewerage network constraints are identified, assessed via Hydraulic Modelling Assessments (HMAs), and funded. Wastewater Treatment Works (WwTW) capacity mechanisms are separately outlined in Paragraph 3.104.

Specific asset constraints and location-based requirements, including for North West Barry and the Barry Nant Talwg Sewage Pumping Station (SPS), are set out in Appendix B. Appendix B has been prepared in consultation with DCWW.

Section 3 of the IDP provides high-level policy guidance, whereas site-specific information is provided in Appendix B. Detailed capacity checks and HMA/DIA assessments will be undertaken in consultation with DCWW at the formal planning application stage to determine the exact nature and timing of any necessary infrastructure reinforcements.

Paragraph 3.108 of the IDP sets out the general policy and procedural framework for addressing WwTW capacity constraints over the entire RLDP plan period.

Asset Management Plan (AMP) investment cycles are regulated separately by Ofwat and updated every five years by DCWW. Paragraph 3.108 establishes the mechanisms (e.g. Development Impact Assessments and planning conditions) to ensure that if a development comes forward where WwTW improvements are not yet programmed within an active AMP, the necessary infrastructure solutions are identified and delivered prior to occupation.

Site-specific wastewater treatment details and baseline feedback provided by DCWW for individual allocations are explicitly set out in Appendix B (Site Specific Infrastructure Schedule).

Finally, with regard to the comments on bathing water standards, this falls under a separate statutory framework established by the Bathing Water Regulations 2013, administered by Natural Resources Wales (NRW). Operational responsibilities of external statutory bodies regarding coastal bathing waters falls outside the scope of the RLDP and, by extension, the IDP.

BP46 - SETTLEMENT BOUNDARY REVIEW

Two representations were made in respect of Background Paper BP46 on the Settlement Boundary Review. These representations consist of one support and one objection. The main issues raised are regarding a request to amend the settlement boundary at Llandow. The reps are summarised below, and full Council response is set out.

SUPPORT

7089 – John

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.

Council Response

Support is noted.

COMMENTS AND OBJECTIONS

6303 – Wyatt - Object

- 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.

Council Response

Settlement boundaries define the extent of built development where development would normally be allowed, and areas of the countryside and areas of more sporadic buildings, which are considered less suitable for new development, and where a more restrictive

approach will be applied. For the purposes of the plan, areas outside of the defined boundaries that are not allocated or protected for specific uses are defined as 'countryside.'

Whilst there is no specific guidance within Planning Policy Wales (Edition 12) (PPW), it establishes the need for settlement boundaries to identify locations where development would be compatible with national policy, locating development within settlements or on land adjoining them, where appropriate. The Development Plans Manual (DPM) provides guidance in the production of Local Development Plans and states that settlement boundaries must be appropriately drawn; taking into account the aims of the overall strategy and the amount and type of development that is attributed to each tier of the settlement hierarchy. Settlement boundaries are drawn and amended on this basis and to ensure that they follow the logical edge of built development within a town or village.

Llandow is identified as a Minor Rural Settlement and, consistent with national policy, within these settlements general market housing will be limited to opportunities within the defined settlement boundaries, including infill development and the conversion of existing buildings.

Llandow is a very small village that has not seen any major development in recent years resulting in the settlement boundary remaining largely unchanged. It is not considered that Ty Fry Farm and The Old Dairy site are connected to the village of Llandow via development or have a visual relationship with it. Although the infrastructure and service provision is noted, the site is located approximately 100m east of Llandow separated by farmland and foliage. Ultimately, the site does not form part of a continuous built frontage into Llandow with a stretch of open countryside intervening between the two. In extending the boundary around Ty Fry Farm and the Old Dairy the boundary would either encroach into open countryside or would have to be narrowed to only Heol-Y-Nant Road which would not represent a logical extension of the Llandow boundary. Therefore, it is not considered that the proposed amendment represents a minor rounding-off of the existing settlement boundary or that it would result in a more coherent and logical settlement edge.

The settlement boundary currently follows the existing curtilages of the homes at the edge of Llandow and does not cut through any existing land or properties, reflecting the extent of the villages-built form. Therefore, it is deemed that this boundary is logical and defensible and clearly reflects the extent of built development in Llandow. This is also the case with numerous properties and farms in proximity to settlement boundaries across the Vale of Glamorgan. These instances are therefore excluded from the boundary as they are not clearly integrated with the settlement and do not reflect the built form.

The fact that the site contains a listed building and is contained within the Llandow Conservation Area does not mean that the site forms part of the village frontage, but is instead identified as an area of special architectural or historic interest alongside the buildings located within Llandow. Therefore, Conservation Area boundaries do not have to

align with settlement boundaries. Likewise, the fact the properties at the site are connected to the infrastructure serving the village of Llandow, or the location of the entrance/welcome sign to Llandow is adjacent to the site, does not form part of the rationale behind drawing settlement boundaries.

Therefore, it is not considered that there is a need to change the Llandow settlement boundary to include the Ty Fry Farm and The Old Dairy curtilages.

GREEN INFRASTRUCTURE STRATEGY

3 representations were submitted in respect of the Green Infrastructure Strategy, comprising 3 objections. The representations are summarised below and full Council response to the issues is set out.

Statutory consultee responses from NRW have been addressed first.

The key issues raised include concerns that the Green Infrastructure Strategy and Assessment require some updates to reflect policy changes. In addition, there is concern that specific local sites have been omitted and the number of bathing beaches is incorrect, alongside criticisms regarding consultant accountability and incorrect terminology being used.

STATUTORY CONSULTEE RESPONSES

6676 – Natural Resources Wales (NRW)

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). Please note that our State of Natural Resources Report (SoNaRR) is now in its third assessment with SoNaRR 2025 recently published (January 2026).

Council Response

The comments that NRW refer to in their previous correspondence specifically in respect of the GIS were as follows:

- We agree with the approach and content of the GIA and support the timeframes for the GIA to run concurrently with the Replacement Local Development Plan (RLDP). We also welcome the proposed Green Infrastructure Zones, which we consider to successfully represent the Vale.
- We suggest that Section 3.3 relating to Water Assets is missing clarification on the extent of the Green Infrastructure (GI) scope into the coastal/marine environment. Furthermore, within Section 3.3.4, we suggest including reference to the Bristol Channel, as the Vale is only adjacent to the Severn Estuary until Lavernack Point.
- We advise that further detail is provided within the GIA/GIS regarding how the GI Zones and GI corridors work together and should be considered in a Green Infrastructure Statement.
- We note the 'needs and opportunities' which are listed within Section 3.3.5, 3.4.5, 3.5.5, 3.6.6 and 3.7.7 of the GIA. However, we advise that these should read more as strategic opportunities which benefit from SMART objectives, timelines, spatial

application/maps and allocation of responsibility/partnership. Although we support the needs and opportunities listed, these should be refined further to be applicable to developers and local Green Infrastructure plans.

- We note that no reference to 'areas of high ecological value' is made within with GIA or wider GIS document. Therefore, we would reiterate these previous comments in this regard and would point out that if different terminology has been used between the RLDP and GIS, then this should be made consistent.
- We welcome the inclusion of the South Central Wales Area Statement. We advise that the strategy seeking to ensure that GI delivery supports (list of policy plans) also includes the South Central Area Statement, which would fulfil Section 11 5b of the Environment Act.
- We also advise that the GI Strategy could also support the Vale Local Nature Partnership local Nature Recovery Action Plan and the Vale 30 by 30 ambition, once both are finalised. These could also be referenced, as well as the Area Statement, in Section 1 and 2.2, to ensure full join up across these plans to meet the well-being goals.
- In addition, we advise updated references to PPW12 and on completion of the SINC review, that GIA maps are updated to reflect any changes (e.g. Page 24, 3.4.2. and Map 3.4).
- We advise the GI strategy does not unintentionally affect nature recovery activity, and vice versa. Awareness of planned GI interventions needs to be shared with partners through the PSB and Local Nature Partnership, so that multiple benefits are more likely to be achieved. This has recently been shown with awareness of the active travel route between Penarth and Sully, and how that interacts with the nature networks either side, as well as itself acting as a corridor improving connectivity in the landscape.

NRW's support for the approach and content of the GIS is noted.

The Strategy was prepared by CBA Studios in late 2023 at which time the RLDP was at Preferred Strategy stage. It is recognised that there is a need to update the GIS to reflect the current status of the RLDP. Whilst a small number of minor editorial changes were undertaken in the version published to support the Deposit RLDP, it has always been the Council's intention to fully update the Green Infrastructure Strategy to take account of all consultation responses after the Deposit consultation. It is also recognised that the strategy will need to be subject to regular review.

With regards to PPW12, an update to Chapter 6 of PPW was published with immediate effect in October 2023, following the publication of a consultation draft in spring 2023. It was then incorporated into PPW Edition 12 in February 2024. The version of the strategy that NRW commented on refers to the Chapter 6 update as the PPW Edition 11 (2023 update). However, the reference to PPW12 was amended in the version published for public

consultation as part of evidence base for the Deposit RLDP. NRW have raised no concern about the conformity of the GIS with the content of PPW and their comments from 2024 relate only to the PPW reference, not that the strategy hasn't taken account of the updated Chapter 6 of PPW.

The Council agrees that the Vale Local Nature Partnership local Nature Recovery Action Plan and the Vale 30 by 30 ambition should be referenced as suggested. The support for references to the South Central Wales Area Statement is noted.

It is also agreed that paragraph 3.4.2 should be amended to reflect the updated number of SINCs as well as amendments to Map 3.4.

NRW's comments in respect of the scope of the Water Assets section in respect of the coastal and marine environment are acknowledged. The GIS does recognise the importance of blue infrastructure and that the coast is a GI asset. In terms of the marine environment, the Council notes that the Welsh National Marine Plan has not been specifically referenced in Box 2.5. This should be added into the GIS as it provides an important policy context for the marine plan area, which covers the area from mean high water spring tides out to 12 nautical miles. It is important that the GIS supports the policy framework set out in the Marine Plan.

In addition to the GIS, the Council does intend to prepare Supplementary Planning Guidance on how blue and green infrastructure can be embedded into specific developments, which will help provide further guidance on the other matters raised, including how the GI Zones and GI corridors can be applied in Green Infrastructure Statement. In addition, the intention is for the GIS to be supported by an Action Plan to take forward the delivery of strategic objectives and priorities.

Proposed changes

The following changes are proposed to the Green Infrastructure Strategy in light of NRW's comments:

- Add a reference to Vale Local Nature Partnership local Nature Recovery Action Plan and the Vale 30 by 30 ambition in Sections 1 and 2.2 and Box 2.5 and Appendix 1.
- Update paragraphs 2.2.2-2.2.3 and Box 2.4 to reflect the Deposit stage of the RLDP.
- Update the reference to the State of Natural Resources Report from 2020 to 2025 in Box 2.5 and update the relevant section in Appendix 1 to reflect the updated report.
- Update Box 2.5 to reference the Wales National Marine Plan.
- Amend paragraph 3.3.4 to read "The Severn Estuary **and Bristol Channel** ~~is~~ **are** also ~~a~~ potential source**s** of tidal flooding in the Vale."
- Update paragraph 3.4.2 and Map 3.4 to reflect the SINC review findings.

COMMENTS/OBJECTIONS

4792 – Maxine Levett - Object

The RLDP's Green Infrastructure (GI) Strategy appears to overlook several significant local biodiversity assets:

- Aberthaw Biodiversity Area (Council owned and agreed for retention). An area with clear potential for designation such as Local Nature Reserve (LNR).
- Cadoxton Ponds Nature Reserve, a major ecological asset not reflected in GI mapping.[gov.uk]
- Other sites already being considered by Scrutiny for LNR status (e.g., Barry Old Harbour, Rhoose Point), demonstrating an active Council interest in expanding nature designations

These omissions raise questions about:

- Whether the GI Strategy has adequately captured local ecological opportunities;
- Who authored and quality assured the document, given factual omissions (e.g., mis counting bathing beaches) and lack of reference to key local sites;
- Whether biodiversity "net gain" claims are being interpreted proportionately, rather than reduced to minimal measures such as bird boxes.

Welsh Government expects the RLDP to be evidence led and based on a robust environmental baseline. Could you confirm:

- Whether Aberthaw, Cadoxton Ponds, and related sites will be added to the GI evidence base;
- Who prepared and signed off the current GI content;
- How biodiversity requirements will be strengthened to reflect site specific ecological value.

Council Response

The GI Strategy only includes reference to formally designated LNRs, rather than prospective ones like Barry Old Harbour, Rhoose Point, Cadoxton Ponds, and Aberthaw Nature Reserve. While these sites are valued local green spaces and/or non-statutory nature sites (SINCs), they are captured spatially in the GI Strategy as SINCs in Map 3.4 Biodiversity Designations.

It is however noted that Barry Old Harbour is a proposed SINC in the RLDP and was not a SINC in the Adopted LDP (2011-2026). As the GI Strategy was prepared prior to the SINC review, Barry Old Harbour has not been mapped as a SINC in Map 3.4. For consistency with the LDP, the Council proposes to update the GI Strategy to include all new SINCs in Map 3.4.

It is noted that the GI Strategy refers to four bathing beaches, whereas the Council's website recognises six (Penarth Beach; Jackson's Bay; Whitmore Bay; The Knap; Col-Huw - Llantwit

Major; Dunraven Bay – Southerndown). The Council therefore proposes to amend this so that the GI Strategy correctly refers to six bathing beaches, rather than four.

The Council agrees that biodiversity enhancements must be meaningful and proportionate to the scale of development. As such, requirements for Green Infrastructure, Recreation Spaces and Biodiversity are written into policy for the Key Site housing allocations.

The Green Infrastructure (GI) Strategy was commissioned by the Council and produced by CBA Studios, an established, qualified professional consultancy. It is intended that the Green Infrastructure Strategy will be updated in light of comments made by Natural Resources Wales (NRW) and other respondents through the consultation.

Site specific biodiversity requirements for development allocations have been thoroughly considered throughout the plan preparation process, including candidate site assessment, viability work, and direct consultation with Natural Resources Wales (NRW). While the RLDP sets the broad policy requirements for Green Infrastructure, the specific methods for delivering a net benefit for biodiversity are evaluated and secured at the detailed planning application stage. Applicants are required to submit up-to-date, site-specific ecological surveys and a bespoke Green Infrastructure Statement/Strategy for the delivery of site-appropriate enhancements, subject to review by Council ecologists and Natural Resources Wales (NRW).

Proposed Changes

The Council proposes the following changes to the Green Infrastructure Strategy:

1. Update Map 3.4 to include all new SINCs that were not included in the Adopted LDP (2011-2026).
2. Amend the references to four bathing beaches so that they correctly refer to six bathing beaches (paragraphs 3.3.1, 3.6.6 and appendix 2).

6255 – Barry & Vale Friends of the Earth - Object

- The CBA body who wrote it are unidentified, with all details blacked out. They make no declaration of professional standards, so cannot be taken to be committed to accuracy and truthfulness as the WGovt requires of consultants.
- SINCs are mentioned, that there was a review but no report of the results
- LNRs are mentioned but not their statutory designation and linkage with the 1981 WCA |(as amended) and the Section 7 responsibility of LAs under EnvWalesAct.
- No mention that management policies for LNRs is required in LDPs
- No mention of the scope and need for extending LNRs with Barry Old Harbour, Rhoose Point, Cadoxton Ponds and Aberthaw nature reserve designations being raised. Indeed the last two are not listed though most important nature conservation sites, one owned by Dow and the other by CCR.

- Bathing Beaches are mentioned but wrong number and nothing about sewage affecting them and the problems of the LA having to manage them with duties under the Bathing Water Regs.
- No mention is made of the Wales Coast path, which VoG manages on behalf of NRW. Gaps in it and proposals to remedy them need listing in the RLWP.
- No mention made of the designated "quiet areas" and responsibility of the Council to review and extend them countywide under the Air quality and Soundscapes (Wales) Act.
- Error saying NBB – net biodiversity benefit is required for development. That's in England, indicating this "consultant" practices there (or is based overseas). In Wales we require *biodiversity is enhanced proportionate to scale and nature of the development.*

Council Response

The redaction of individual names, signatures, and direct contact details in public-facing consultation documents is standard practice to comply with GDPR data protection legislation. The Green Infrastructure (GI) Strategy was commissioned by the Council and produced by CBA Studios, an established, qualified professional consultancy. The redaction of individual personal data does not invalidate the professional integrity, accuracy, or status of the document.

The Sites of Importance for Nature Conservation (SINC) Review and its subsequent results have been published in BP40A Sites of Importance for Nature Conservation Review.

It is not considered necessary for the GI Strategy (GIS) to list all specific enabling legislation that applies to individual designations like LNRs. Box 2.5 of the GI Strategy provides a comprehensive summary of the overarching national legislation, policy, and guidance that provide the framework for local Green Infrastructure planning.

The assertion that LDPs require site-specific management policies for LNRs is incorrect. The LDP protects designated nature conservation sites, including LNRs, from adverse development impacts (e.g. Policy SP19). However, management policies for individual LNRs are separate non-statutory documents prepared by countryside management services and relevant stakeholders outside the LDP process.

The GI Strategy only includes reference to formally designated LNRs, rather than prospective ones like Barry Old Harbour, Rhoose Point, Cadoxton Ponds, and Aberthaw Nature Reserve. While these sites are valued local green spaces and/or non-statutory nature sites (SINCs), they are captured spatially in the GI Strategy as SINCs in Map 3.4 Biodiversity Designations. It is however noted that Barry Old Harbour is a proposed SINC in the RLDP, and was not a SINC in the Adopted LDP (2011-2026). As the GI Strategy was prepared prior to the SINC review, Barry Old Harbour has not been mapped as a SINC in Map 3.4. For consistency with the LDP, the Council proposes to update the GI Strategy to include all new SINCs in Map 3.4.

It is important to note that the formal declaration or extension of LNRs is a separate legal/administrative procedure the National Parks and Access to the Countryside Act 1949 (as amended) requiring landowner agreement, resource availability and management capacity, rather than a land-use allocation in the LDP or GI Strategy. The Council cannot use the GI Strategy or LDP to allocate third-party or unbudgeted land as an LNR. Crucially, while Barry Old Harbour has received public support to become an LNR, the motion was rejected by Council due to resource and funding constraints.

It is noted that the GI Strategy refers to four bathing beaches, whereas the Council's website recognises six (Penarth Beach; Jackson's Bay; Whitmore Bay; The Knap; Col-Huw - Llantwit Major; Dunraven Bay – Southerndown). The Council therefore proposes to amend this so that the GI Strategy correctly refers to six bathing beaches, rather than four.

With regard to the point on bathing beaches, the primary purpose of the GI Strategy is to set out a spatial framework for protecting, enhancing, and delivering multifunctional green and blue infrastructure. Operational issues regarding sewage discharge and water utility performance fall under the regulatory remit of Dŵr Cymru Welsh Water, Natural Resources Wales, and statutory environmental health frameworks. It therefore sits outside the scope of the RLDP and the GI Strategy.

The Wales Coastal Path is not omitted from the GI Strategy. It is explicitly referenced on pages 92 and 97, and illustrated in Map 3.7 Access: Spaces & Routes, showing no gaps.

The physical spaces designated as Quiet Areas across the Vale (Belle Vue Park; Penarth Head Lane; Victoria Playing Fields; Golden Gates; and, Alexandra Park) are already mapped and protected within the GI Strategy as key recreational and GI assets. While the GIS does not formally refer to Quiet Areas, the Council considers that adding brief supporting text regarding soundscapes will support the alignment between GI provision and soundscape management.

The term 'net benefit for biodiversity' is a Welsh policy term (see PPW12 paragraph 6.2.5), with the equivalent English term being 'Biodiversity Net Gain'. Any references to net benefit for biodiversity are entirely appropriate for the GI Strategy and the RLDP.

Proposed Changes

The Council proposes the following changes to the Green Infrastructure Strategy:

1. Update Map 3.4 to include all new SINCs that were not included in the Adopted LDP (2011-2026).
2. Amend the references to four bathing beaches so that they correctly refer to six bathing beaches (paragraphs 3.3.1, 3.6.6 and appendix 2).
3. Add a brief supporting text to Box 3.1 *Vale of Glamorgan GI Typology* with regard to Quiet Areas.

HEALTH PLACEMAKING SPG - REPRESENTATIONS AND COUNCIL'S RESPONSE

Representations were received from Cardiff and Vale Local Health Board in respect of the Draft Healthy Placemaking SPG. Overall support was for the SPG was , with suggested changes, which are appended to the final version of the SPG. General comments made of the Deposit RLDP in respect which were considered relevant to the SPG where identified have also been incorporated in the amended SPG

6215 – Taylor – Object

SF&G support community-led farms, gardens, and growing spaces as a means to improve health, social bonds, and resilience. We believe policy coherence is essential to enable community solutions across health, food, environment and economy. We would like to see integration of diverse food growing spaces into new developments, including small communal areas that communities can own and design. Recognition of community rights to build essential structures, support for varied typologies, and strategic collaboration are vital. Further engagement with SF&G via Lucie Taylor would be appreciated.

Council response

Consideration of access to food growing spaces is set out is section 12 of the SPG.

6713 – Cardiff and Vale University Health Board – Comment

1) Section 5.24 Suggestion to re-word the section relating to Good Food and Movement (GF&M) to match the description of the GF&M plan: "The Good Food and Movement Framework (2024-2030) sets out where, in Cardiff and the Vale of Glamorgan, we will prioritise our collective efforts and how we will work together to create change; in the environment, across our settings and in our communities. It has been shaped locally by a wide range of ideas, perspectives and voices and describes how, together we will create environments, settings and opportunities that enable good food and movement for everyone in Cardiff and the Vale of Glamorgan."
2) Section 6.7 Table does not include checklist and criteria for when a comprehensive HIA is required (as described in 7.2).
3) Section 7.7 Re-word from 'encouraged' to 'expected'. We would like to see a requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and challenges. This might be achieved as part of the HIA which includes stakeholder engagement.
4) Section 7.18 Suggestion to include the following information: "Provide meaningful community engagement - actively seek to engage with a range of citizens, especially those who may be directly impacted (adjoining streets and areas), using accessible and clear materials, resources and language. Provide engagement opportunities in a place and time accessible to the community."

5) Section 7 (general comment): consider how the quality of the HIA will be assessed by the council, as part of effectively implementing the requirements for HIAs.
6) Section 9.4: Research shows that many teenage girls, young women and gender diverse young people do not feel welcome, comfortable or safe in parks or that they have a place to play https://committees.parliament.uk/writtenevidence/153636/pdf). Therefore, along with children and young people needing free, inclusive and accessible spaces for high quality plan and informal recreation opportunities, also consider advocating for such spaces to be designed for and to work better for young girls and teenage girls, to positively impact this cohort.
7) Section 13: CAVUHB Primary, Community and intermediate Care and Strategic Planning have previously commented on access to healthcare and community facilities - please refer to the 'BP37 Primary, Community and Intermediate Health Care' for more detail.
8) General comment: Whilst there is a focus on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multi functional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement. Suggestion to include wording below to support multi-functional green infrastructure consistent with placemaking principles: “Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other opportunities for local food production as part of multifunctional green infrastructure.”

Council response

The change proposed at point 1 is agreed.

Para 6.7 will be amended to remove reference to HIA - clarifying that developments will be required to either submit the health place making checklist or undertake a Rapid HIA.

The change to section 7.7 (point 3) is accepted.

The change to section 7.18 is also accepted (point 4).

A new paragraph is proposed in Section 7 to address the matter raised on the quality of the HIA (point 5).

Furthermore, a new paragraph will be added to Section 9.4 to address safety in parks (point 6).

The Council will also include additional paragraph to state that CAVUHB will also be consulted formally on major planning applications (point 7).

The issues raised in point 8 are noted.

Proposed changes

- Amend Paragraph 5.24 as follows "The Good Food and Movement Framework (2024-2030) ~~for Cardiff and the Vale of Glamorgan brings together partners from the PSBs and the Regional Partnership Board to provide a regional response to how we can encourage people to be more active and have a healthier diet. This strategy focuses on collective action to create meaningful change in communities, schools, workplaces, and the environment over the next six years~~ **sets out where, in Cardiff and the Vale of Glamorgan, we will prioritise our collective efforts and how we will work together to create change; in the environment, across our settings and in our communities. It has been shaped locally by a wide range of ideas, perspectives and voices and describes how, together we will create environments, settings and opportunities that enable good food and movement for everyone in Cardiff and the Vale of Glamorgan."**
- Amend Paragraph 6.7 as follows "To the achieve this, Strategic Policy SP5 requires developers to assess and understand the impact of their schemes on health and wellbeing through the application of either **the Council's Healthy Placemaking Screening Checklist provided at Appendix 1 or through undertaking** a Rapid Health Impact Assessment ~~or HIA screening tool~~ subject to the thresholds set out in Table 1."
- Amend Paragraph 7.7 to read "Engagement with the local community early in the process is ~~encouraged~~ **expected**".
- Addition line to Paragraph 7.18 "Early dialogue with the local community and organisations provides the opportunity to identify more specific needs within the local area, and shape how the design of the development can respond to addressing the community aspirations, **especially those who may be directly impacted (adjoining streets and areas), using accessible and clear materials, resources and language to provide engagement opportunities in a place and time accessible to the community.**"
- Include a new paragraph in Section 7 to reference the quality of HIAs.
- Include a new paragraph to Section 9 to address safety in parks.
- Include an additional paragraph to state that CAVUHB will also be consulted formally on major planning applications.

6777 - Persimmon Homes (Boyer Planning) – Object
6910 – Barratt Redrow Homes (Boyer Planning) – Object

The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the

SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Council response

The comments are noted.

The Wales Health Impact Assessment Support Unit have issued '*Guidance for Local Planning Authorities (LPAs) in Wales: What to consider when advising applicants on the requirements of a Health Impact Assessment (HIA) for development.'* This guidance explains that it is a matter for the local planning authority to set out the triggers for HIA and that these should be proportionate and reasonable. Given that it is the LPA that sets the policy rather than the Regulations themselves, it is not considered necessary to make specific reference to the HIA Regulations within the policy, as this may cause confusion in respect of the requirements.

The SPG states that when undertaking initial HIA screening this "*will generally be proportionate to the size of the development; the larger the development the more detailed the responses to the questions will be expected to be, whereas smaller developments are more likely to provide a brief summary*" (paragraph 6.1.8).

6625 - South Wales Police Secured by Design Officer - Comment

South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.

Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry). Where Health care facilities are proposed South

Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.

Council Response

Reference will be made to the Safer Parks document in the Healthy Placemaking SPG.

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN
2021 - 2036

SCHEDULE OF FOCUSSED CHANGES, MINOR EDITORIAL CHANGES AND OTHER CHANGES

November 2026



RLDP CDLN

VALE of GLAMORGAN
BRO MORGANNWG

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

FOCUSSED CHANGES

	Policy/ Paragraph No	Type of Change	Amendment	Reason
FC1	Policy Context	Amendment	Under National Policy Context, reference Cymraeg 2050: A million Welsh-speakers. **Cymraeg 2050: A million Welsh-speakers** **2.XX Cymraeg 2050: A Million Welsh Speakers is the Welsh Government's long-term strategy for promoting and increasing the use of the Welsh language. Published in 2017, its central ambition is to increase the number of Welsh speakers to one million by 2050 and to significantly increase the number of people who use Welsh every day. The strategy states that the land use planning system should contribute to the vitality of the Welsh language by creating suitable conditions for thriving, sustainable communities, supported by an awareness of the relevant principles of language planning.** Under Local Policy Context, reference the Vale of Glamorgan Welsh Language Promotion Strategy and the Welsh in Education Strategic Plan (WESP) 2022–2032. **Vale of Glamorgan Welsh Language Promotion Strategy 2022-2027** **2.XX The Welsh Language Promotion Strategy is a 5-year strategy to promote the Welsh language with the Vale. The strategy recognises that there are no areas of linguistic sensitivity in the Vale (usually areas where at least 20% of the population speak Welsh) but planning has a role in creating favourable conditions for the Welsh language.** **Welsh in Education Strategic Plan (WESP) 2022–2032**	In response to WG representation (5179) on the Welsh Language.

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			2.XX The Welsh in Education Strategic Plan 2022-2032 (WESP) sets out the Council's ten-year plan for further developing the provision of Welsh medium and Welsh language education. The ten-year vision for increasing and improving the planning of the provision of Welsh-medium education in the Vale of Glamorgan is to increase the number of Year 1 children taught through the medium of Welsh to 24% by 2031-32. This equates to approximately 390 year one places being made available by 2031-32 based on current population projections. This target is based on contributing to the overall long-term target of one million people in Wales being Welsh speakers by 2050, as set out in Cymraeg 2050: A Million Welsh Speakers (Cymraeg 2050). **2.XX Increasing capacity is a key part of the WESP. The Sustainable Communities for Learning Programme (previously the 21st Century Schools Programme) is a long-term strategic investment in educational estate throughout Wales and there have been several new Welsh Medium schools proposed with further planned as part of the programme.**	
FC2	Objective 9 – Building a Prosperous and Green Economy	Amendment	Make reference to the Port of Barry in the Objective 'Promote Cardiff Airport and Bro Tathan Enterprise Zone, **the Port of Barry** and the former Aberthaw power station site, as important employment areas, enabling delivery of high-quality and skilled jobs, training, and education opportunities.'	Amendment in response to representation from ABP (6228).
FC3	Key Element 6 – Allowing for regeneration opportunities on previously	Factual update	Paragraph 5.35 should be amended as follows: 5.35 In addition, Associated British Ports (ABP) ~~have prepared a Masterplan~~ **will be masterplanning the Port** which identifies future redevelopment opportunities on land within their ownership. This **may** include ~~includes~~: • ~~Upgrading in Landy Windsor Lock and installation of new lock gates to meet the needs of all vessels using the Dock~~ **Investment in Port infrastructure**.	Factual update in response to representations from ABP (6231)

	Policy/ Paragraph No	Type of Change	Amendment	Reason
	developed and under-utilised land, including at the former Aberthaw Power Station and Barry Docks. Supporting text paragraph 5.35.		• Redevelopment of Black Rocks Growth Zone for **potential** uses such as battery supply chain, advanced manufacturing, rare earth mineral processing, ~~and~~ next generation biofuel manufacturing, **and other green energy generation and Port-related opportunities**. • The Port Clean Growth Hub focusing on zero carbon **operations and** manufacturing.	
FC4	SP1 Sustainable Growth Strategy	Factual update	Amend the policy text as follows: <u>Housing</u> The delivery of 7,890 dwellings by 2036, including a minimum of ~~3,070~~ **3,108** affordable homes.	Consequential changes in light of 1st April 2026 housing monitoring.
FC5	SP4 Placemaking	Amendment	Amend criterion 9 of SP4 to read: 'Protecting or enhancing the historic environment and its setting, **and the natural environment'**	Amendment in response to representation from NRW (7033).

	Policy/ Paragraph No	Type of Change	Amendment	Reason
FC6	SP6 Housing and consequential changes to Paragraphs 6.67-6.70, Table 2 Table 3 and Paragraph 6.74	Amendment	Policy SP6 amended as follows to incorporate the latest housing monitoring data. Please also see FC15 and FC16 for two minor amendments to housing capacities which have also been incorporated. To meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of ~~8,660~~ **8,616** homes in the Plan Period 2021 to 2036. This will be delivered by: • ~~3,837~~ **3,927** dwellings from the existing land supply • ~~3,520~~ **3,519** dwellings on allocated sites • ~~1,303~~ **1,170** dwellings from large and small windfall developments 6.67 Policy SP6 sets out a housing requirement of 7,890 dwellings over the plan period, equating to 526 units per annum. To ensure flexibility and support deliverability, the Plan includes a ~~10%~~ **9.2%** over-allocation, making provision for a total of ~~8,660~~ **8,616** dwellings. This housing provision will be delivered from the component sources listed in Table 2. 6.68 In order to meet this housing requirement figure, the Council has considered the contribution from sites that have been completed since April 1st 2021, units under construction and units with planning permission, also factoring in an assumption for non-delivery. Collectively these sources would contribute ~~3,837~~ **3,927** dwellings towards meeting the housing requirement. Further detail on the contribution from each source is summarised in Table 2. 6.69 A further source of housing arises from windfall developments, which are sites that are not specifically allocated for housing yet come forward in accordance with the development plan and other material planning considerations. Analysis of historical delivery of housing indicates that on average small windfall sites (sites of	Consequential changes in light of 1st April 2026 housing monitoring and updated trajectory forecasts. NB – The reduction in the flexibility allowance is not as a result of the deletion of allocated sites or significant change in the number of units allocated but is due to the low levels of completions in 2025-26, with lower than anticipated small and large

<table>
<tr><th></th><th>Policy/ Paragraph No</th><th>Type of Change</th><th>Amendment</th><th>Reason</th></tr>
<tr><td></td><td></td><td></td><td>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~~ 1,170 dwellings over the remainder of the plan.

6.70 Table 2 also includes the number of dwellings that are allocated for residential development on key sites, rolled forward sites that are considered to be deliverable, and other housing allocations, including affordable housing led sites. These allocations could deliver ~~3,520~~ 3,519 dwellings. Further details of the Council's analysis of the Vale of Glamorgan land supply are set out in the RLDP Housing Land Supply Background Paper.

Table 2 updates:

<table>
<tr><th></th><th>Component of Supply</th><th>Number of Dwellings</th><th>Notes</th></tr>
<tr><td>A</td><td>Completions 21/22 – ~~24/25~~ 25/26</td><td>~~1,747~~ 1,919</td><td>Comprising ~~1,562~~ 1,693 dwellings on large sites and ~~185~~ 226 dwellings on small sites</td></tr>
<tr><td>B</td><td>Units under construction 1st April ~~2025~~ 2026</td><td>~~313~~ 346</td><td>Comprising Large Sites 10 dwellings ></td></tr>
<tr><td>C</td><td>Units within planning permission</td><td>~~1,860~~ 1,739</td><td>Includes sites that have S106 agreements pending where it is realistic that the agreement will be signed.</td></tr>
</table></td><td>site windfall completions. Due to rounding, the Deposit flexibility allowance has only decreased from 9.8% (rounded to 10%) to 9.2%.</td></tr>
</table>

	Policy/ Paragraph No	Type of Change	Amendment						Reason
				D	Non-delivery allowance for land bank	~~-83~~ **-77**	Assumed 5% of units with planning permission where construction has not already commenced (~~1663~~ **1,547** units) will not be delivered based on past delivery rates		
					Total Existing Supply (A+B+C-D)	~~3,837~~ **3,927**			
				E	Large Sites Windfall Allowance (10 or more dwellings)	~~720~~ **640**	Based on past delivery rates over adopted LDP plan period. To avoid double counting of large windfall sites already within the land supply, this allowance has been discounted from the first 2 years of the land supply and applied to the subsequent ~~9~~ **8** remaining years of the plan (80 dwellings x ~~9~~ **8** years)		
				F	Small Sites Windfall Allowance	~~583~~ **530**	Based on past delivery rates. This allowance has been applied to the remaining ~~11~~ **10** years of the plan period (53 dwellings x ~~11~~ **10** years)		
					Total Windfall allowance (E+F)	~~1,303~~ **1,170**			
					RLDP allocations	~~3,520~~ **3,519**	Key sites – 2,278 units New housing allocations – 161 units		

	Policy/ Paragraph No	Type of Change	Amendment	Reason

			Rolled forward sites – ~~959~~ **958** units Affordable housing led sites – 122 units
	Housing Provision	~~8,660~~ **8,616**	

Spatial Distribution of Housing Growth

6.71 The table below summaries the spatial distribution of the various components of the housing land supply as they relate to the RLDP Settlement Hierarchy. The table indicates that ~~1,747~~ **1,919** dwellings have already been constructed since the commencement of the plan period and that the existing housing land bank will contribute to a considerable proportion of the identified housing requirement. The distribution of windfalls across the settlement hierarchy shown in the table is representative of historical trends which indicate that most windfall development has come from sites within Barry and the Service Centres of Cowbridge, Llantwit Major and Penarth, and the projected allowance reflects this trend. Further details of the Council's analysis of windfall trends are set out in the RLDP Housing Land Supply Paper.

Table 3: Spatial Distribution of Housing Supply (April ~~2025~~ **2026**)

Components of Housing Supply	Total	Settlement Hierarchy

	Policy/ Paragraph No	Type of Change	Amendment	Reason

			Key Settlement Barry	Service Centre Settlements	Primary Settlements in Strategic Growth Area	Minor Rural Settlements and Primary Settlements outside of Strategic Growth Area	Hamlets and Smaller Rural Settlements
A	Small Windfall Completions 2021-~~25~~ 26	~~185~~ **226**	~~70~~ **80**	~~73~~ **90**	22	~~15~~ **29**	**5**
A	Large (Windfall) and Allocations Completions 2021-~~25~~ **26**	~~1,562~~ **1,693**	~~581~~ **626**	~~394~~ **375**	~~569~~ **664**	~~18~~ **28**	**0**
B	Units under Construction April ~~2025~~ **2026**	~~313~~ **346**	~~70~~ **94**	~~163~~ **138**	~~63~~ **30**	~~17~~ **46**	~~**0**~~ **38**
C	Units with Planning permission **with 5% reduction for** ~~including~~ non-delivery	~~1,777~~ **1,662**	~~66~~ **0**	~~1,004~~ **1,015**	~~331~~ **345**	~~124~~ **86**	~~**253**~~ **217**

	Policy/ Paragraph No	Type of Change	Amendment							Reason
				Existing land supply	~~3,837~~ **3,927**	~~787~~ **800**	~~1,634~~ **1,618**	~~985~~ **1,061**	~~174~~ **189**	~~258~~ **260**	
			D	LDP Sites rolled forward	~~959~~ **958**	~~200~~ **199**	340	419	0	0	
			F	Key Housing Allocations	2,278	376	0	1,902	0	0	
			G	Other allocations including Affordable Housing Led Sites	283	110	0	51	122	0	
				Allocated sites	~~3,520~~ **3,519**	~~686~~ **685**	**340**	**2,372**	**122**	**0**	
			G	Large windfall sites (10>)	~~720~~ **640**	~~376~~ **326**	~~172~~ **147**	~~81~~ **83**	~~52~~ **51**	~~39~~ **32**	
			H	Small windfall sites (<10)	~~583~~ **530**	~~304~~ **270**	~~139~~ **122**	~~65~~ **69**	42	~~32~~ **27**	

<table>
<tr><th></th><th>Policy/ Paragraph No</th><th>Type of Change</th><th>Amendment</th><th>Reason</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td></td><td>Total Windfall</td><td><s>1,303</s> 1,170</td><td><s>680</s> 597</td><td><s>311</s> 269</td><td><s>146</s> 152</td><td>94</td><td><s>71</s> 59</td></tr>
<tr><td>I</td><td>Total Housing Provision</td><td><s>8,660</s> 8,616</td><td><s>2,153</s> 2,082</td><td><s>2,285</s> 2,227</td><td><s>3,503</s> 3,585</td><td><s>390</s> 404</td><td><s>329</s> 318</td></tr>
</table>

6.74 Strategic Policies SP1 and SP6 identify a housing requirement of 7,890 dwellings over the plan period. To allow for choice and flexibility, the plan makes provision for <s>8,660</s> 8,616 dwellings, which equates to a flexibility allowance of <s>10</s> 9.2%. Policy HG1 sets out the housing sites that will contribute towards meeting the housing land supply requirement.
</td><td></td></tr>
<tr><td>FC7</td><td>HG1.1 Land to the west of Pencoedtre Lane, Barry</td><td>Amendment</td><td>Amend the number of units from 135 to 99 units in light of site constraints identified through the masterplanning process.

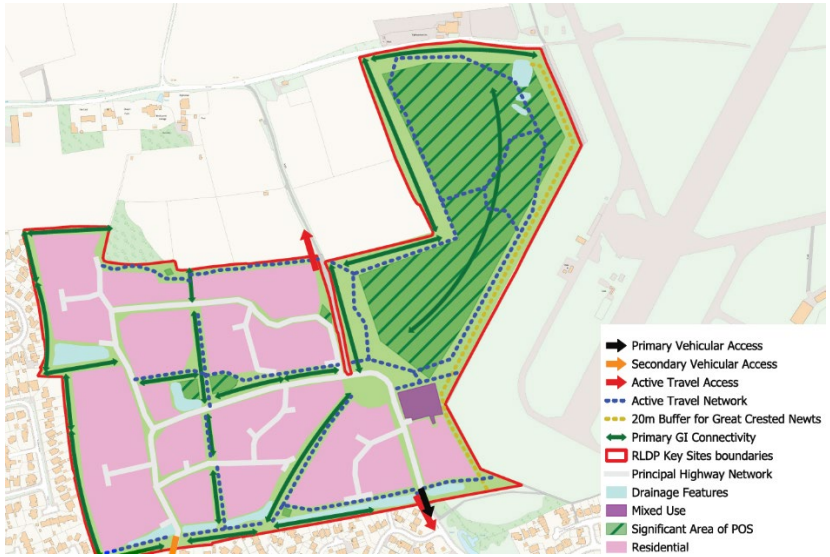
This will result in consequential changes to the total dwelling contribution figure in Section B of Policy HG1 Housing Allocations as well as Policy SP6, Table 2 and Table 3. These have been addressed under FC6 to account for updated housing monitoring data for 2025/26.</td><td>To reflect updated site capacity work.</td></tr>
<tr><td>FC8</td><td>HG1.2 Land at the Mole, Barry</td><td>Amendments</td><td>Amend the number of units from 65 to 100 to reflect a recent planning approval (2023/00051/HYB) which increased the number of units.

As the planning permission was approved on 17th July 2026, after the base date of the latest monitoring (1st April 2026), it is proposed to continue to include the site</td><td>To reflect an amended capacity identified in a</td></tr>
</table>

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			as a housing allocation rather than part of the existing land supply/major land bank site. This will result in consequential changes to the total dwelling contribution figure in Section B of Policy HG1 Housing Allocations as well as Policy SP6, Table 2 and Table 3. These have been addressed under FC6 to account for updated housing monitoring data for 2025/26.	recent planning approval.
FC9	Key Housing site – Paragraph 6.80	Amendment	Amend paragraph 6.80 as follows: 'The sites at Barry, Rhoose and St Athan that are identified as Key Sites are those that best accord with the principles of the Sustainable Growth Strategy. As part of the production of the RLDP the Council held a serious of Placemaking Engagement Sessions in the communities near the sites which gave local residents the opportunity to inform the illustrative masterplans that accompany each of the Key Sites. **A Masterplan has been prepared for each of the key sites to demonstrate the key placemaking and design principles that would apply to each site. Each high-level plan is referenced as 'indicative,' rather than being a detailed site layout. However, it does set out key parameters including which parts of the site are likely to accommodate built development and which are open space and green infrastructure corridors, which will also include areas required to achieve net biodiversity benefit**. **As the layouts are described as indicative, the detailed masterplans and site layouts will be subject to further consideration and determination through the planning application process.** In addition, independent site-specific development viability appraisals have been undertaken to ensure site deliver and the ability of sites to financial support the necessary affordable housing and other supporting infrastructure specified within each Key Site Policy.'	Amendment in response to representation from Barratt Redrow Homes (7103).
FC10	HG1 Key sites KS1-KS5	Amendment	Remove reference to the number of affordable dwellings on each site and just retain the percentage.	Amendment in response to representations

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			HG1 KS1 Land at North West Barry • The provision of a minimum of ~~113~~ **30%** affordable housing ~~units (30%)~~ with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data. HG1 KS2 Land to the North of Dinas Powys • The provision of a minimum of ~~100~~ **40%** affordable housing ~~units (40%)~~ with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data. HG1 KS3 Land at Readers Way, Rhoose • The provision of a minimum of ~~182~~ **35%** affordable housing ~~units (35%)~~ with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data. HG1 KS4 Land at Church Farm, St Athan • The provision of a minimum of ~~81~~ **35%** affordable housing ~~units~~ on phase**s** 1 and 2 ~~105 affordable units on phase 2 (35%)~~ with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data. HG1 KS5 Land to the west of St Athan • The provision of a minimum of ~~210~~ **35%** affordable housing ~~units (35%)~~ with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data.	from site promoters, including Barratt Redrow Homes (7103) and Savills (6741).
FC11	HG1 KS1 Land at North West	Factual update	Include the following bullet point:	Factual update in response to

	Policy/ Paragraph No	Type of Change	Amendment	Reason
	Barry (and consequential change to Appendix 2)		• **The site is in close proximity to Walters Farm and Barry Woodlands SSSI and the provision and/or enhancement of appropriate alternative open space on site and/or in the area to reduce recreational pressure on the SSSI will be required.** Also include in the key site constraints section of Appendix 2 and BP44 Infrastructure Plan.	representation from NRW (6654).
FC12	HG1 KS2 Land North of Dinas Powys	Amendment	Amend the wording of Policy HG1 KS2 be amended as follows to remove reference to Georges Row. This should instead refer to the existing link from Seel Park to Highfield Close: The inclusion of walking and cycling links between the development and **Highfield Close via** Seel Park ~~and George's Row.~~	Amendment in response to additional evidence on land ownership
FC13	HG1 KS3 Land at Readers Way, Rhoose	Amendment	Amend one bullet point and add an additional bullet point to Policy KS3: • ~~The provision of a pond that holds water and connected green infrastructure close to Readers Way Pond is required to provide~~ **In order to provide** an appropriate **terrestrial** habitat for great crested newts**, a minimum 20 metre wide corridor must be provided on the eastern boundary of the site to provide a link to the wider countryside. Ponds should be provided in the north of the site. These should not form part of the open space and should be fenced and managed for great crested newts.** • **The site is within the 12.6km Core Recreational Catchment Zone for the Severn Estuary European Marine Site and will be considered for a financial contribution as part of the Mitigation Strategy for the site. Green space design must consider any emerging guidance for Suitable Alternate Natural Greenspace (SANG) to reduce recreational pressure on the features of the Estuary.**	Amendments in response to representations from NRW (6656 and 6674).

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			Update Appendix 2 to reference this. Update the Indicative Plan for KS3 to show the GCN corridor and additional ponds to the north of the site.  	

	Policy/ Paragraph No	Type of Change	Amendment	Reason
FC14	HG1 KS4 Land at Church Farm, St Athan	Amendment	Amend the key site policy wording as follows: A new ~~access to St Athan Primary~~ **road** through the site to ~~replace the existing sub-standard access to the school from Rock Road~~ **facilitate an alternative access to St Athan Primary School, should this be required**.	Amendment in response to representation from Barratt Redrow Homes (7103)
FC15	HG1 KS5 Land west of St Athan	Amendment	Under 'Sustainable Transport and Highways', reference to the safeguarding of land on the southern side of the railway line will be amended from Policy CI3 (2) to Policy CI3 (6). The Council will amend bullet point 8 so that it reads: '**The provision of (or contribution towards) pedestrian/cycle links to Llantwit Road and pedestrian footway improvements along Llantwit Road.**'	Typographical correction and amendment in response to representation by Hallam Land (6741).
FC16	SP7 Affordable Housing Provision and supporting text - paragraph 6.119 and Table 5 Projected Affordable	Factual update	Amend Policy SP7 as follows: The residential requirement identified in Policy SP6 is expected to contribute to the established community housing needs of the Vale of Glamorgan by delivering a minimum of ~~3,070~~ **3,108** affordable residential units over the plan period. Amend supporting text as follows: To help address the need identified, Policy SP7 anticipates that RLDP will contribute towards delivering a minimum of ~~3,070~~ **3,108** affordable dwellings over the plan period.	Consequential changes in light of 1st April 2026 housing monitoring.

<table>
<tr><th></th><th>Policy/ Paragraph No</th><th>Type of Change</th><th>Amendment</th><th>Reason</th></tr>
<tr><td></td><td>Housing Units by Source</td><td></td><td>Table 5

<table><tr><th>Source</th><th>Affordable Dwellings</th></tr><tr><td>Number of affordable dwellings delivered April 1st, 2021, to the 31st March ~~2025~~ 2026</td><td>~~702~~ 791</td></tr><tr><td>Sites with permission and or under construction on April 1st ~~2025~~ 2026</td><td>~~908~~ 863</td></tr><tr><td>Contribution from rolled forward LDP allocations</td><td>~~222~~ 224</td></tr><tr><td>Contributions from Key and additional housing sites</td><td>952</td></tr><tr><td>Contributions from Affordable Housing Led Sites</td><td>62</td></tr><tr><td>Contributions from Large Windfall Developments</td><td>~~224~~ 216</td></tr><tr><td>Total Affordable Units</td><td>~~3,070~~ 3,108</td></tr></table></td><td></td></tr>
<tr><td>FC17</td><td>Policy SP7 – Supporting text - Paragraph 6.121 Affordable Housing</td><td>Amendment</td><td>Amend paragraph 6.121 as follows:
“The Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments. This may include social and intermediate rent and low-cost home ownership, as well as co-operative housing and other forms of community led affordable housing and ~~those requiring~~ specialist housing including for older people.”</td><td>To ensure conformity with updates to the definition of affordable housing in PPW 12, as indicated by the representation by Cwmpas (4803)</td></tr>
<tr><td>FC18</td><td>HG5 – Affordable</td><td>Amendment</td><td>Amend paragraph 6.141 as follows:</td><td>To ensure conformity</td></tr>
</table>

	Policy/ Paragraph No	Type of Change	Amendment	Reason
	Housing Exception Sites, paragraph 6.141.		In general, the Council will require affordable housing to be delivered by a Registered Social Landlord (RSL), the Council or the community itself - for example via a community land trust **or other forms and models of community led affordable housing.**	with updates to the definition of affordable housing in PPW 12, as indicated by the representation by Cwmpas (4800)
FC19	TR1 – supporting text paragraphs 6.189 and 6.190	Amendment	Amend paragraphs 6.189 and 6.190 as follows: 6.189 PPW indicates that development plans should identify and where necessary safeguard areas for future transport infrastructure, and where the precise location is not known safeguard the area of land necessary for the proposal. **Therefore, the Public Transport Schemes and the Highways Improvements have been shown on the Proposals Map as symbols.** 6.190 Three Active Travel schemes aimed at improving walking and cycling connectivity between settlements within the Strategic Growth Area have been identified. All three schemes are included on the Council's Active Travel Network Map **and are shown on the Proposals Map.**	To provide clarity on how locations for transport proposals have been shown on the proposals map.
FC20	SP12.1 Land at Church Farm, St Athan (and consequential amendments	Amendment	Amend Policy SP12 as follows: Land at Church Farm, St Athan – up to ~~1,858 sq m~~ **1,400 sq m** Amend Policy 6.209 as follows:	To ensure consistency in the policy between gross and net retail

	Policy/ Paragraph No	Type of Change	Amendment	Reason
	to supporting text 6.209, HG1 KS4 and paragraph 6.99)		In addition, up to ~~1,858 sq m~~ **1,400 sq m** of **net** additional convenience floorspace is allocated as part of the mixed used residential led allocation at Church Farm, St Athan (Policy HG1 KS4 refers). Amend HG1 KS4 as follows: The 24.1 Ha site will deliver 532 homes over the plan period and a class A1 retail foodstore of up to ~~20,000 sq ft (~~**1,400** ~~1,858~~ sq m~~)~~ with associated car parking. Amend Paragraph 6.99 as follows: Phase 1 will deliver 232 units and **up to 1,400 sq m** ~~1,672 – 1,858 sq m (18,000-20,000 sq ft)~~ Class A1 retail food store.	floorspace areas.
FC21	Policy RCS1	Amendment	Amend Policy RCS1 to improve clarity and to elevate the marketing requirement from the supporting text to the policy as follows: *Proposals involving the change of use at ground floor level uses from A1 retail use will **be** permitted where the proposal ~~would~~:* *1 Support**s** ~~the~~ vitality and vibrancy of the town centre by generating footfall and economic activity; **and*** *2 ~~Be~~ **is** compatible with surrounding uses and the commercial character of the centre; **and*** *3 **Would** not result in adverse amenity impacts; **and*** *4 Provide**s** an active frontage; **and***	To improve clarity and address a representation from Lidl GB Ltd (7020) which referenced a policy requirement on marketing that

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			*5 Avoid**s** an over-concentration of non-retail uses that would undermine the retail function of the centre;* ***and*** ***6 It can be demonstrated that the unit has been appropriately marketed.*** An additional sentence will be included in Paragraph 6.215 as follows: **Non-A1 retail proposals within a retail centre will be carefully controlled to ensure that the viability and vitality of retail centres are not adversely affected by an over concentration or clustering of non-A1 retail premises. Given the diversity and individual characteristics of each local centre, the Council shall annually monitor the proportion of retail and non-retail within centres in accordance with the proposed RLDP monitoring framework to inform the suitability of proposals for non-A1 uses.** Introduce a new indicator in Appendix 3 Monitoring Framework (FCA16).	was included in the supporting text and not within the policy itself as well as clarification on how over-concentration will be assessed.
FC22 and FC23	CI1 Open Space Provision and supporting text	Amendment	Add the following two sites under Policy CI1 (FC22 is Land at Cosmeston Lakes Country Park and FC23 is Land at Porthkerry Country Park): **Land is safeguarded for the provision of open space at the following locations:** **1. Land at Cosmeston Lakes Country Park (27 ha)** **2. Land at Porthkerry Country Park (42 ha)** **6.XX Land has been safeguarded to provide additional open space through extensions to Cosmeston Lakes Country Park and Porthkerry Country Park. Both extensions have the potential to deliver additional Suitable Alternative Natural Greenspace (SANG) to help address recreational pressure on the Severn Estuary, as set out in Policy DNP8.**	To address an omission in the Deposit RLDP. Both sites were identified for open space in the adopted LDP so this would roll forward designations that were

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			6.XX To complement the existing provision at Cosmeston Lakes Country Park, approximately 27 hectares of land to the west of Mile End Road and north of Cogan Hall Farm is allocated as an extension to the country park. The land is within the ownership of the Council. **The extension to Porthkerry Country Park is referenced in Policy SP14.2 Land South of Port Road (Model Farm). There is a requirement for the transfer of land to the Vale of Glamorgan Council to facilitate a 42-hectare extension to the country park, together with an associated financial contribution.** Both sites will also be shown on the Proposals Map	previously found to be sound.
FC24	SP14.3 Bro Tathan Aerospace and Business Park and EMP3.3	Amendment	Amend references to "Bro Tathan Aerospace and Business Park" to read "Bro Tathan Business Park" in Policy SP14 Also consequential changes to paragraph 6.267 and EMP3.4.	Amendment in response to representations made by Welsh Government (5187, 5191)
FC25	EMP1.2 Land at the Port of Barry – supporting text paragraph 6.283	Factual update	Amend paragraph 6.283 as follows: "The plans for the Port of Barry represent the next stage in the regeneration of Barry Docks and focus~~es~~ on enhancing the docks' future economic role. The identification of the area as an Employment Regeneration Opportunity Area reflects the vision and aspirations of ABP contained within its **emerging** long-term strategy ~~Future Ports: Barry~~. This **will** set ~~sets~~ out the employment areas and operational port land at ~~No2 Dock to 2035~~ **the Port** and focus~~es~~ on developing the port around low and zero carbon sectors alongside traditional marine related industrial uses."	Factual update in response to representation from ABP (6234)

	Policy/ Paragraph No	Type of Change	Amendment	Reason
FC26	EMP2 MOD St Athan – supporting text paragraphs 6.286 and 6.288	Amendment	Paragraph 6.286 should be amended as follows: ~~Policy EMP2 supports development within MOD St Athan where it is required for operational purposes, as defined on the Policies Map. Similarly, proposals within or on land immediately adjacent to MOD St Athan will only be permitted where these proposals would not adversely affect or prejudice the use of the area for its operational purposes.~~ **New development within or adjoining MOD St Athan and the safeguarded MOD technical site that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. Proposals for non-military or non-defence related development within or in the areas around MOD St Athan, or the safeguarded MOD technical site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.** Paragraph 6.288 should also be amended to include additional text: Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example where proposals include a wind turbine or roof mounted solar PV system. **In addition, tall or narrow profile structures such as masts or flue stacks with a**	Amendment in response to representation made by MOD (6700)

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.	
FC27	SP18 Sustainable Provision of Minerals	Amendment	Amend Criterion 4 of Policy SP18 as follows: • Safeguarding **existing and planned infrastructure, including** railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, **together with wider minerals processing infrastructure.**"	To ensure full consistency with PPW paragraph 5.14.7, in response to representation made by Mineral Products Association (6807)
FC28	SP18 Sustainable Provision of Minerals Supporting text – new paragraph after 6.376	Amendment	Add the following paragraph to the supporting text: **The following are active mineral working sites in the Vale of Glamorgan and inactive sites where future working is considered likely to occur:** **1. Aberthaw** **2. Lithalun** **3. Pantyffynnon** **4. Longlands** **5. Forest Wood (Shared with Rhondda Cynon Taf)** **6. Ruthin*** **7. Garwa*** **8. Pant*** **9. Ewenny***	To ensure consistency with the Proposals Map. Active, inactive and dormant quarries were shown on the Proposals Map but active and inactive quarries were

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			10. Wenvoe* ***Currently inactive but held in reserve** Consequential changes will be required to the Proposals Map. BP25 Minerals will also be updated to reflect the most up to date information.	not specifically referenced in the RLDP. Inactive quarries were shown on the 'Dormant Minerals Site' layer in the Deposit RLDP Proposals Map but should be shown on the 'Quarry Site' layer for consistency with the approach in the adopted LDP where sites have an extant permission and there is a realistic prospect of them being worked.

	Policy/ Paragraph No	Type of Change	Amendment	Reason
FC29	New Policy SPXX – Natural Environment	New Policy	Include a new policy on the Natural Environment as follows: **SPXX Natural Environment** **To protect, conserve, restore and enhance the Vale of Glamorgan's natural environment and ensure the Sustainable Management of Natural Resources, all development proposals must demonstrate that they:** 1 **Protect statutorily and non-statutorily designated sites, protected habitats and protected species and species of principal importance and existing biodiversity assets, including trees, woodland and hedgerows, from adverse impacts;** 2 **Safeguard important landscapes, including Special Landscape Areas and the Glamorgan Heritage Coast.** 3 **Safeguard soil resources.** 4 **Safeguard Best and Most Versatile (BMV) agricultural land in accordance with national planning policy, avoiding its loss wherever possible.** 5 **Protect and improve air quality.** 6 **Protect, maintain and enhance the quality and quantity of surface water and groundwater resources through the incorporation of sustainable drainage systems (SuDS), the use of nature-based solutions where appropriate, the protection of watercourses and riparian corridors, and the provision of suitable ecological buffer zones.** 7 **Maintain and strengthen ecological networks and green infrastructure connectivity across the Vale.** **6.XXX The Vale of Glamorgan contains a diverse range of natural assets that contribute significantly to the area's environmental quality, biodiversity, landscape character, climate resilience and the health and well-being of**	

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			communities. These assets include internationally, nationally and locally designated nature conservation sites, protected and priority habitats and species, woodlands, trees, hedgerows, rivers, coastal environments, agricultural land and valued landscapes. Protecting and enhancing these resources is essential to achieving sustainable development and supporting the sustainable management of natural resources. **6.XXX Development proposals should avoid adverse impacts on biodiversity and ecological features wherever possible through appropriate site selection, design and layout. This policy should therefore be considered alongside Policy SP20 on biodiversity and ecosystem resilience.** **6.XXX Trees, woodlands and hedgerows are important components of the Vale's green infrastructure network and provide a range of ecosystem services, including carbon sequestration, habitat provision, flood mitigation, air quality improvement and landscape enhancement. Existing trees, woodlands and hedgerows should be retained and integrated into development schemes wherever possible.** **6.XXX The Vale's landscapes make an important contribution to local distinctiveness, biodiversity, recreation and tourism. Development proposals should also consider the specific policies on Special Landscape Areas (DNP1) and the Glamorgan Heritage Coast (DNP3).** **6.XXX Soils are a finite and valuable natural resource that support food production, biodiversity, water management and carbon storage. Development should minimise the loss, degradation and sealing of soils and incorporate measures to conserve and appropriately manage soil resources during both**	

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			construction and operation. Particular consideration should be given to protecting the Best and Most Versatile (BMV) agricultural land in accordance with national planning policy. **6.XXX Poor air quality can have significant impacts on human health, biodiversity and environmental quality. Development proposals should minimise emissions, reduce exposure to air pollution and incorporate measures that contribute towards maintaining and improving air quality.** **6.XXX The protection and sustainable management of water resources is critical in responding to climate change and maintaining healthy ecosystems. Development proposals should protect surface water and groundwater resources from pollution and adverse impacts and should incorporate sustainable drainage systems (SuDS) and, where appropriate, nature-based solutions to manage water quantity and quality. The protection of watercourses, riparian corridors and associated habitats through appropriate buffer zones can help improve ecological resilience, reduce flood risk and enhance biodiversity.** **6.XXX The maintenance and enhancement of ecological networks and green infrastructure connectivity are essential for building ecosystem resilience and enabling species movement in response to habitat fragmentation and climate change. This policy should be considered alongside policy SP19 on Green Infrastructure.**	

	Policy/ Paragraph No	Type of Change	Amendment	Reason
FC30	SP19 Green Infrastructure	Amendment	Amend the policy wording of SP19 as follows: Development proposals will incorporate measures that protect and enhance ~~high quality~~ multi-functional green infrastructure provision. Amend criterion 2 of SP19: 2 Protect and enhance connectivity between existing green infrastructure assets **and be planned wherever possible to positively support areas of high ecological value.** Add an additional criterion to Policy SP19: **10 Have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessments (and the assets listed therein) and the Green Infrastructure Action Plan** Add an additional sentence into paragraph 6.397: **However, multi-functional uses of space must be considered carefully so that they are not detrimental to the natural environment or the policy requirement to achieve net benefit for biodiversity**	Amendment in response to representations by Welsh Government (Planning Division) (5177) and Natural Resources Wales (7031)
FC31	Policy SP20 Biodiversity and Ecosystem Resilience and	Amendment	Policy SP20 and its supporting text are amended as follows: Biodiversity in the Vale of Glamorgan will be protected, maintained and enhanced. All development proposals must demonstrate how they will contribute to the	Amendment in response to representations by NRW (7034/6643).

	Policy/ Paragraph No	Type of Change	Amendment	Reason
	supporting text		maintenance and enhancement of biodiversity and the resilience and connectivity of ecosystems. Proposals for new development must: 1 Avoid areas of high ecological value. 2 ~~Be accompanied by~~ **Consider whether** an ecological survey **is required. Where surveys are necessary, these must be completed in full and submitted as part of the application.** ~~and assessment of the likely impacts of the proposal on the biodiversity and ecosystem resilience of the development site. The survey and assessment to be proportionate to the nature and scale of the ecological value of the site and the nature and scale of the proposed development.~~ 3 Demonstrate ~~through~~ the application of the ~~S~~**s**tep-wise approach **where developments have firstly been designed to avoid all adverse impacts. Where impacts cannot be fully avoided, they should be minimised, with mitigation to offset unavoidable impacts considered as the next step. Compensation should be seen as a last resort.** ~~that there has been an~~ **Developments will need to demonstrate an** overall net benefit for biodiversity proportionate to the nature and scale of the development. ~~4 Ensure that International and UK protected species and habitats are protected in accordance with statutory requirements.~~ Protect the integrity of non-statutory ~~locally and regionally designated sites~~ **wildlife and geological sites** ensuring that they are appropriately protected and managed.	

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			5 ~~Incorporate existing green infrastructure at the early stages of design, that protects and enhances existing site features and~~ **Ensure that development** improves the connectivity of the ecological network. 6 Be designed to avoid the introduction or spread of invasive non-native species~~. and where necessary, include proposals to eliminate, minimise, reduce and mitigate the impacts of invasive non-native species on biodiversity and ecosystems.~~ 7 Incorporate nature-based solutions within the development to support biodiversity and build ecosystem resilience within the site and the wider area. 8 Make provision for the on-going maintenance and management of existing and newly created nature conservation interests proportionate to the nature and scale of the development. 9 **Protect trees, woodlands and hedgerows. Where losses are unavoidable, compensation will be required at the replacement levels set out in national planning policy.** Where development is considered appropriate and the on-site delivery of nature-based solutions is not feasible or sufficient, planning obligations and/or conditions will be used to secure and maintain compensatory off-site habitats and measures. ~~that are functionally related to the assets within the site and contribute to the wider local nature recovery priorities.~~	

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			6.403 Policy SP20 Biodiversity and Ecosystem Resilience recognises the importance of the Vale of Glamorgan's natural assets and seeks to ensure that they are protected, maintained and enhanced not only for their intrinsic nature conservation value, but also for the wider social, economic and community benefits that they provide. 6.404 The Environment (Wales) Act 2016 introduced an enhanced biodiversity and resilience of ecosystems duty (Section 6 Duty) on public authorities in Wales. This duty requires that in the exercise of their functions, public authorities in Wales must seek to maintain and enhance biodiversity by ensuring development does not cause any significant loss of habitats or populations of species and must provide a net benefit for biodiversity and improved ecosystem resilience. 6.XXX **Areas of high ecological value can be defined as:** **1. Statutorily Protected Sites - Within the Vale, this includes Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSIs).** **2. Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed. Within the Vale this includes ancient woodland and veteran trees, ancient hedgerows, wet woodlands, peatland, species rich grassland, long undisturbed soils, salt marsh and lowland fen.** **3. Areas with populations of nationally rare and/or declining species or protected species where mitigation and compensation measures are either difficult to achieve or where the likelihood of success is low.**	

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			6.405 ~~Development~~ **Applications** will ~~therefore~~ be required to demonstrate that a net benefit for biodiversity can be achieved. A net benefit for biodiversity can be achieved through a range of actions ranging from habitat creation and/or long-term management arrangements that enhance existing degraded habitats ~~or semi natural habitats~~ and improve the resilience of ecosystems. Benefits must be long term, measurable **and** demonstrable ~~and primarily on site~~. Biodiversity enhancements should be delivered **by** following the step-wise approach of firstly avoiding **any adverse impacts**, then minimising, ~~with mitigation~~ **then mitigating**, **with compensation being considered** as a last resort for any negative impact. Where it is not possible to achieve on-site ~~mitigation~~ **compensation** and enhancement, off-site ~~compensation~~ **provision** must be provided to ensure a biodiversity net benefit. **This policy applies to all development proposals, including on non-statutorily local and regional sites such as Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs) and Regionally Important Geodiversity Sites (RIGS).** 6.406 Networks of natural habitats and green infrastructure provide a valuable ecological resource. They connect sites of biodiversity importance and provide **habitats for wildlife,** and stepping stones for the migration, dispersal and genetic exchange of species within the wider environment. To avoid fragmentation and isolation of natural habitats, it is essential that such networks are protected from inappropriate development and, where possible, enhanced. The Council's Green Infrastructure Assessment ~~identifies the green infrastructure provision within the Vale of Glamorgan and~~ contains a vision, recommendations, and action plan of how green infrastructure within the Vale can be extended and enhanced.	

	Policy/ Paragraph No	Type of Change	Amendment	Reason
			6.407 Sensitive design and choice of location of new development can have a positive effect on the Vale's built and natural heritage. Similarly, new development will be required to minimise its impact on natural systems **and** landscapes~~, species and habitats and where appropriate provide opportunities for the creation of new habitats or the sensitive enhancement of existing habitats. Consideration should be given to the Vale Nature Partnership's Nature Recovery Action Plan (NRAP) and any opportunities that exist to support the actions identified~~. **Applicants are advised to review the Council's Supplementary Planning Guidance on Biodiversity and Development for further information.** 6.408 Where a management plan is required, this should set out the immediate and on-going management proposals for the site **as well as** the future monitoring **and remediation** arrangements ~~and~~ **including** the funding mechanisms available to ~~meet~~ **deliver** the management plan objectives. The plan should include details of the proposed timescale for securing a net benefit for biodiversity within as short a time scale as possible. 6.409 Invasive Non-Native Species (INNS) are alien animals, plants or other organisms that can spread and cause harm to the environment, the economy and health. Development proposals must be designed and implemented to avoid the spread or introduction of INNS. ~~and where INNS are known to exist or suspected to be present on a site, planning applications must include a survey and risk assessment undertaken by a competent professional that provides details of how the INNS will be controlled, eradicated or contained both during and after construction.~~ **In addition, where a Construction Environmental Management Plan (CEMP)**	

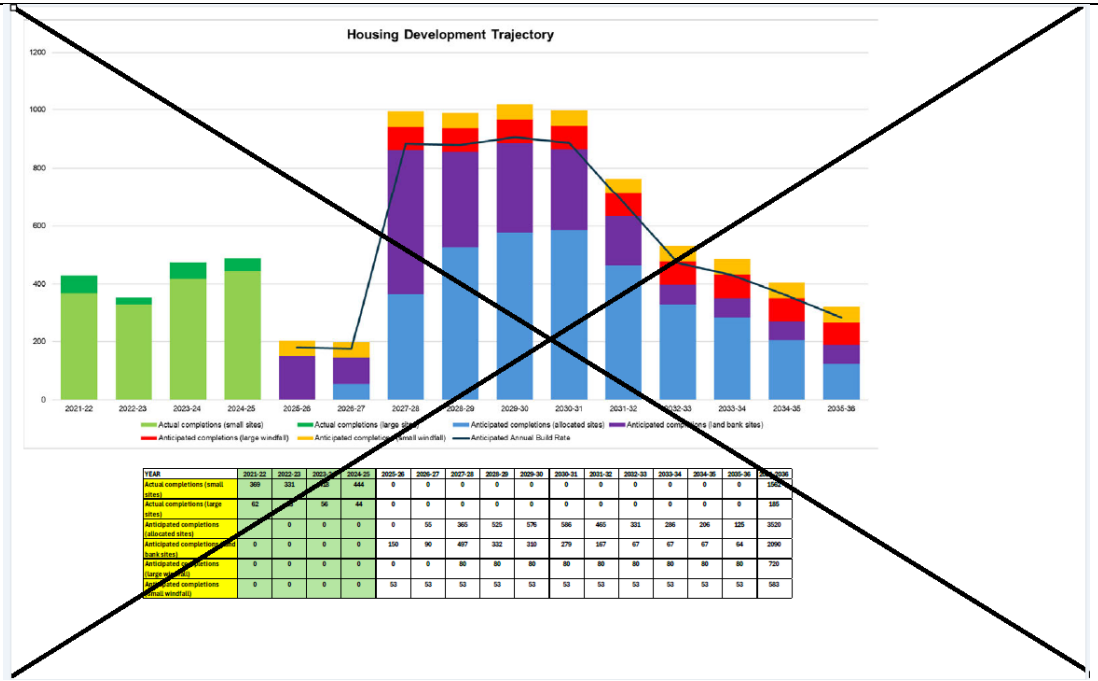
	Policy/ Paragraph No	Type of Change	Amendment	Reason
			is required as part of a planning permission, biosecurity measures must be included as part of this. 6.XXX **Trees, woodlands and hedgerows are important components of the Vale's green infrastructure network and provide a range of ecosystem services, including carbon sequestration, habitat provision, flood mitigation, air quality improvement and landscape enhancement. Existing trees, woodlands and hedgerows must be retained and integrated into development schemes. Applicants should also consider the requirements of the Council's Supplementary Planning Guidance on Trees, Woodlands and Hedgerows and Development and the Vale of Glamorgan Tree Strategy.** 6.410 Policy SP20 is supported by SP13 Community Infrastructure and Planning Obligations and SP19 Green Infrastructure. These require new development to provide new community infrastructure including Green Infrastructure and features that support net biodiversity benefit and to incorporate Green Infrastructure respectively. 6.411 Some areas in the east of the Vale of Glamorgan lie within 300m of the Severn Estuary SPA/Ramsar, the distance within which material visual and noise disturbance impacts to qualifying birds are likely to occur. As recommended by the RLDP Habitats Regulation Assessment **(HRA)**, to minimise the potential for visual and noise disturbance, any construction works on new sites within 300m of the Severn Estuary SPA/Ramsar should be undertaken in the summer months, when qualifying populations in the site will not be present. If this cannot be timed to avoid the non-breeding season, noise impact assessments will need to be undertaken to ensure that noise levels at sensitive receptors will remain non-disturbing.	

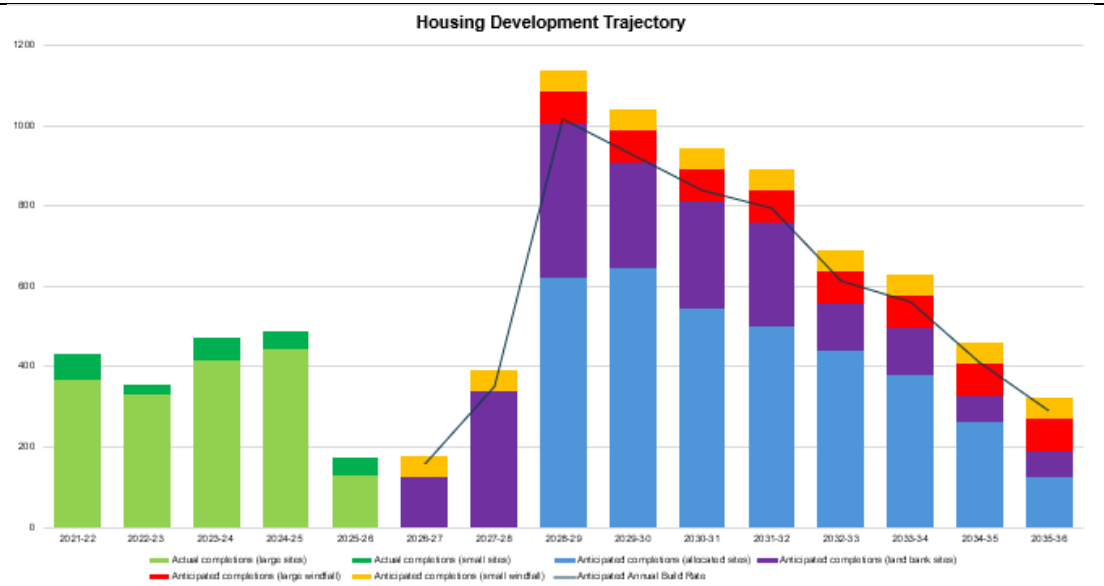
	Policy/ Paragraph No	Type of Change	Amendment	Reason
			Appropriate screening will be required for construction works within 300m of any established high-tide roosts or key foraging areas within or outside the SPA/Ramsar. If the prevailing habitats are deemed suitable, non-breeding bird surveys of adjoining undeveloped land parcels should be undertaken to establish whether these are functionally linked to the SPA/Ramsar and if concluded to be the case, mitigation measures should also apply to these areas. **Development proposals that could potentially have an impact on the Severn Estuary European designations should be accompanied by an HRA. This will also need to consider run-off and air quality.**	
FC32	DNP5 Environment Protection	Amendment	Amend Paragraph 6.430 to include the following in respect of proposals affecting BMV land: 6.4.30 Policy DNP5 follows the precautionary approach, and the Council encourages developers to assess any impact at the earliest stage so that development proposals reduce any impact present to an acceptable level. Where development is permitted conditions will be attached to the approval to minimise any potential pollution levels and where appropriate monitor the effects of the development. **For proposals that would result in the loss of grades 1, 2 and 3a Best and Most Versatile Land, these will be considered in accordance the policy requirements set out in Planning Policy Wales.**	To provide clarity on the consideration of BMV land in response to representation by Taylor Wimpey (6849)
FC33	DNP8 Severn Estuary Recreational Pressure	Amendment	Amend paragraphs 6.442 and 6.443 as follows: A Core Recreational Catchment zone of 12.6km has been identified in the HRA to inform the RLDP as a consistent recreational catchment around the European site.	To ensure consistency with the Severn Estuary

	Policy/ Paragraph No	Type of Change	Amendment	Reason
	Paragraphs 6.442 and 6.443		**However, this catchment zone may be refined in light of locally specific visitor survey information.** ~~This~~ **The Core Recreational Catchment Zone** indicates where new development might be required to make financial contribution to fund on-site SAC/SPA/Ramsar conservation measures, as part of strategic mitigation measures. This takes the form of a recreation mitigation and management strategy and would include a mixture of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) measures. 6.443 The provision of SANG must be a key design consideration **for** ~~in~~ developments within ~~12.6km of the Severn Estuary~~ **the Core Recreational Catchment** ~~with housing site allocation policies referring to provision Supplementary Planning Guidance will provide~~ **The Council has prepared a Recreation Mitigation Strategy which will be subject to regular review and Supplementary Planning Guidance will be prepared to** provide further information on the mechanisms for delivery.	Mitigation Strategy

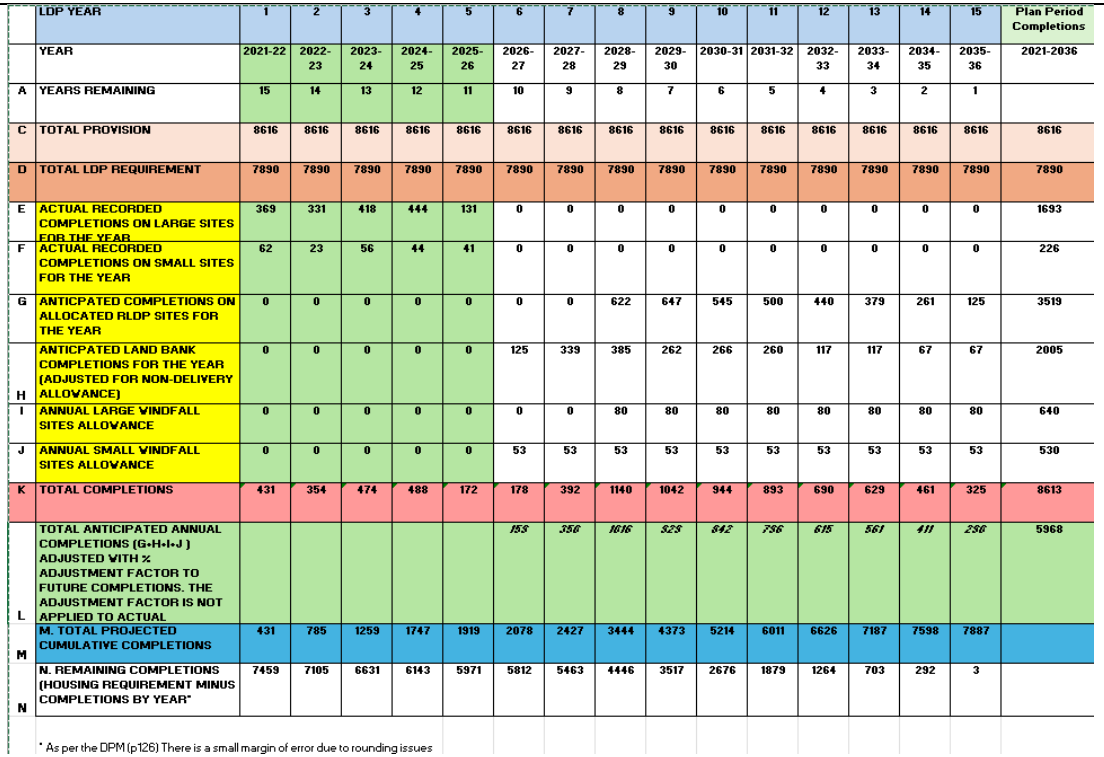
Appendices

	Section	Type of Change	Amendment	Reason
FCA1	Appendix 1	Amendment	Update the Housing Development Trajectory in Appendix 1 of the RLDP to include additional rows in the Table to ensure that it fully mirrors Table 21 of the DPM and to reflect consequential changes in FC6 and updates to forecasts.	Amendment to ensure conformity with the Development Plans Manual in response to representation

			 YEAR 2021-22 2022-23 2023-24 2024-25 2025-26 2026-27 2027-28 2028-29 2029-30 2030-31 2031-32 2032-33 2033-34 2034-35 2035-36 2036 Actual completions (small sites) 369 331 [illegible] 444 0 0 0 0 0 0 0 0 0 0 0 1952 Actual completions (Large sites) 62 [illegible] 56 44 0 0 0 0 0 0 0 0 0 0 0 185 Anticipated completions (allocated sites) 0 0 0 0 0 55 365 525 576 586 465 331 286 206 125 3520 Anticipated completions (land bank sites) 0 0 0 0 150 90 407 332 310 279 167 67 67 67 64 2090 Anticipated completions (large windfall) 0 0 0 0 0 0 80 80 80 80 80 80 80 80 80 720 Anticipated completions (small windfall) 0 0 0 0 53 53 53 53 53 53 53 53 53 53 53 583	by WG (5118) and in light of consequential changes and factual updates.



YEAR	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2021-2036
Actual completions (large sites)	369	331	418	444	131	0	0	0	0	0	0	0	0	0	0	1693
Actual completions (small sites)	62	23	56	44	41	0	0	0	0	0	0	0	0	0	0	226
Anticipated completions	0	0	0	0	0	0	0	622	647	545	500	440	379	261	125	3519
Anticipated completions (land	0	0	0	0	0	125	339	385	262	266	260	117	117	67	67	2005
Anticipated completions (large	0	0	0	0	0	0	0	80	80	80	80	80	80	80	80	640
Anticipated completions (small	0	0	0	0	0	53	53	53	53	53	53	53	53	53	53	530

				
FCA2	Appendix 2 – Infrastructure Plan – list of surveys required	Amendment	Expand bullet point on list of evidence required to support a planning application in Appendix 2 as follows: • **There will be a requirement for up to date ecological appraisals and protected species surveys to be prepared, the exact scope of which will need to be determined in consultation with the Council's ecologist at the time of application. Should the surveys identify evidence of protected species, a detailed masterplan will need to demonstrate the retention, provision and enhancement of essential areas for protected species.**	Amendment in response to representation by NRW (6653).

	LDP YEAR	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Plan Period Completions
	YEAR	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36	2021-2036
A	YEARS REMAINING	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1	
C	TOTAL PROVISION	8616	8616	8616	8616	8616	8616	8616	8616	8616	8616	8616	8616	8616	8616	8616	8616
D	TOTAL LDP REQUIREMENT	7890	7890	7890	7890	7890	7890	7890	7890	7890	7890	7890	7890	7890	7890	7890	7890
E	ACTUAL RECORDED COMPLETIONS ON LARGE SITES FOR THE YEAR	369	331	418	444	131	0	0	0	0	0	0	0	0	0	0	1693
F	ACTUAL RECORDED COMPLETIONS ON SMALL SITES FOR THE YEAR	62	23	56	44	41	0	0	0	0	0	0	0	0	0	0	226
G	ANTICPATED COMPLETIONS ON ALLOCATED RLDP SITES FOR THE YEAR	0	0	0	0	0	0	0	622	647	545	500	440	379	261	125	3519
H	ANTICPATED LAND BANK COMPLETIONS FOR THE YEAR (ADJUSTED FOR NON-DELIVERY ALLOWANCE)	0	0	0	0	0	125	339	385	262	266	260	117	117	67	67	2005
I	ANNUAL LARGE WINDFALL SITES ALLOWANCE	0	0	0	0	0	0	0	80	80	80	80	80	80	80	80	640
J	ANNUAL SMALL WINDFALL SITES ALLOWANCE	0	0	0	0	0	53	53	53	53	53	53	53	53	53	53	530
K	TOTAL COMPLETIONS	431	354	474	488	172	178	392	1140	1042	944	893	690	629	461	325	8613
L	TOTAL ANTICIPATED ANNUAL COMPLETIONS (G+H+I+J) ADJUSTED WITH % ADJUSTMENT FACTOR TO FUTURE COMPLETIONS. THE ADJUSTMENT FACTOR IS NOT APPLIED TO ACTUAL						*158*	*356*	*1016*	*925*	*842*	*796*	*615*	*561*	*411*	*286*	5968
M	M. TOTAL PROJECTED CUMULATIVE COMPLETIONS	431	785	1259	1747	1919	2078	2427	3444	4373	5214	6011	6626	7187	7598	7887	
N	N. REMAINING COMPLETIONS (HOUSING REQUIREMENT MINUS COMPLETIONS BY YEAR*	7459	7105	6631	6143	5971	5812	5463	4446	3517	2676	1879	1264	703	292	3	

* As per the DPM (p126) There is a small margin of error due to rounding issues

FCA3	Appendix 2 Infrastructure Plan – HG1 KS4 Church Farm, St Athan	Factual update	Include the following text as a key site issue/constraint: • **Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site that exceed 15.2m to ensure that there is no impact on the operation or capability of the defence site or asset.**	Factual update in response to representation by MOD (6704)
FCA4	Appendix 2 Infrastructure Plan – HG1 KS5 Land West of St Athan	Factual update	Include the following text as a key site issue/constraint: • **Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site that exceed 15.2m to ensure that there is no impact on the operation or capability of the defence site or asset.**	Factual update in response to representation by MOD (6705)
FCA5	Appendix 2 Infrastructure Plan – HG1.1 Land at Pencoedtre Lane, Barry	Factual update	Under key site issues and constraints amend as follows: • 125mm, **450mm**, 17" and 36" watermains cross~~ing~~ the site. • **The site is within 200m of Barry Woodlands SSSI and the provision and/or enhancement of appropriate alternative open space on site and/or in the area to reduce recreational pressure on the SSSI will be required.** In the notes section of water supply/sewage add the following: **The water network can supply the proposed development and the public sewerage network can accept potential foul flows.** These should also be amended in BP44 Infrastructure Plan.	Factual update in response to representations by DCWW (6977) and NRW (6659).
FCA6	Appendix 2 Infrastructure Plan – HG1.4 Land	Factual update	Under key site issues and constraints add: • **Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.**	Factual update in response to representations by NRW

	at Neptune Road, Barry		• **Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.** • **A 150mm diameter watermain, a 2 x 160mm watermains and a 300mm diameter surface water sewer cross the site.** Under key infrastructure requirements add: • **Water Supply - A hydraulic modelling assessment (HMA) will be required.** • **Wastewater - The public sewerage network can accept potential foul flows from this development site.** These should also be amended in BP44 Infrastructure Plan.	(6662) and DCWW (6980)
FCA7	Appendix 2 Infrastructure Plan – HG1.5 Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)	Factual update/ typographical correction	Amend the first word of the following sentence: ~~Any~~ **A** minor area of the site is located within Flood Zone 2 Fluvial flood risk is confined to the southern boundary of the site, with flood zones associated with the Boverton Brook ~~which flows through the site~~. Add additional sentences: • **Any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.** • **Hydraulic modelling assessments will be required for the water supply and wastewater.**	Typographical correction Factual update in response to representations by NRW (6663) and DCWW (6982)
FCA8	Appendix 2 – Infrastructure Plan – HG1.6 Land	Factual update	Under key site issues and constraints amend as follows: • **The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.**	Factual update in response to representations by NRW (6664).

	at St Athan Road, Cowbridge			
FCA9	Appendix 2 Infrastructure Plan – HG1.7 Former Stadium Site adjacent to Burley Place, St Athan	Factual update	Under key site issues and constraints amend as follows: • **Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site to ensure that there is no impact on the operation or capability of the defence site or asset.** This should also be amended in BP44 Infrastructure Plan.	Factual update in response to representation by MOD (6706)
FCA10	Appendix 2 Infrastructure Plan – HG1.8 Clive Road, St Athan	Factual update	Under key site issues and constraints amend as follows: • **Due to proximity to the MOD St Athan technical safeguarding zone, there is a statutory requirement to consult the MOD on any applications for development on the site to ensure that there is no impact on the operation or capability of the defence site or asset.** These should also be amended in BP44 Infrastructure Plan.	Factual update in response to representation by MOD (6707)
FCA11	Appendix 2 Infrastructure Plan – HG1.9 Land North of the Railway, Rhoose	Factual update	Under key site issues and constraints include the following: • **The Happy Valley Level Crossing is located to the south of the site and developers must consult with Network Rail to demonstrate that safety will not be compromised or that mitigation measures will be incorporated to prevent any increased safety risk.** • **Water supply/sewerage - The site is near to a Sewage Pumping Station (SPS). To avoid the potential for noise or odour nuisance for future**	Factual update in response to representations by Network Rail (6794) and DCWW (6987)

			occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.	
FCA12	Appendix 2 Infrastructure Plan – HG4.1 Land to the East of Colwinston	Factual update	Under key site issues and constraints amend as follows: • **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**. This should also be amended in BP44 Infrastructure Plan.	Factual update in response to representations by NRW (6665)
FCA13	Appendix 2 Infrastructure Plan – HG4.4 Land north of West Winds Business Park, Fferm Goch	Factual update	Under key site issues and constraints add: • **A 150mm diameter foul sewer crosses the site.** Under key infrastructure requirements add: • **Water Supply – The water network can supply the proposed development** • **Wastewater - The public sewerage network can accept potential foul flows from this development site** • **Cowbridge WwTW has capacity to accept foul flows from the proposed development.** These should also be amended in BP44 Infrastructure Plan.	Factual update in response to representations by DCWW (6992)
FCA14	Appendix 2 Infrastructure Plan	Amendment	Include a new section in Appendix 2 and BP44 Infrastructure Plan identifying the site-specific constraints on new employment sites and Gypsy and Traveller site provision.	Factual update in response to representations by NRW and DCWW.

<table>
<tr>
<td>FCA15</td>
<td>Appendix 3 – Monitoring Framework – SP13</td>
<td></td>
<td>Include a new monitoring indicator for Policy SP13 to monitor the proportion of children attending Welsh Medium schools
<table>
<tr><th>Monitoring Outcome</th><th>Indicator</th><th>Target</th><th>Trigger/ Variation</th><th>Source of information</th></tr>
<tr><td>To increase the % of children receiving Welsh Medium education</td><td>Percentage of children attending Welsh Medium Schools</td><td>Increase in the % of children attending Welsh Medium schools assessed against all school places in the Vale</td><td>No increase in the % of children attending Welsh Medium schools for two consecutive years</td><td>Number on roll data</td></tr>
</table></td>
<td>In response to WG representation (5179) on the Welsh Language.</td>
</tr>
<tr>
<td>FCA16</td>
<td>Appendix 3 – Monitoring Framework - Retail</td>
<td>Amendment</td>
<td><table>
<tr><th>Monitoring Outcome</th><th>Indicator</th><th>Target</th><th>Trigger/ Variation</th><th>Source of information</th></tr>
<tr><td>To ensure that the Vale’s retail centres are vibrant,</td><td>Proportion of A1 and Non-A1 uses within retail centre</td><td>Maintain or increase the proportion of A1 uses in retail</td><td>Decrease in the proportion of A1 uses by 10% against</td><td>Baseline – Background Paper 47A Retail Centre Uses</td></tr>
</table></td>
<td>Amendment in response to representation by Lidl GB Ltd (7020)</td>
</tr>
</table>

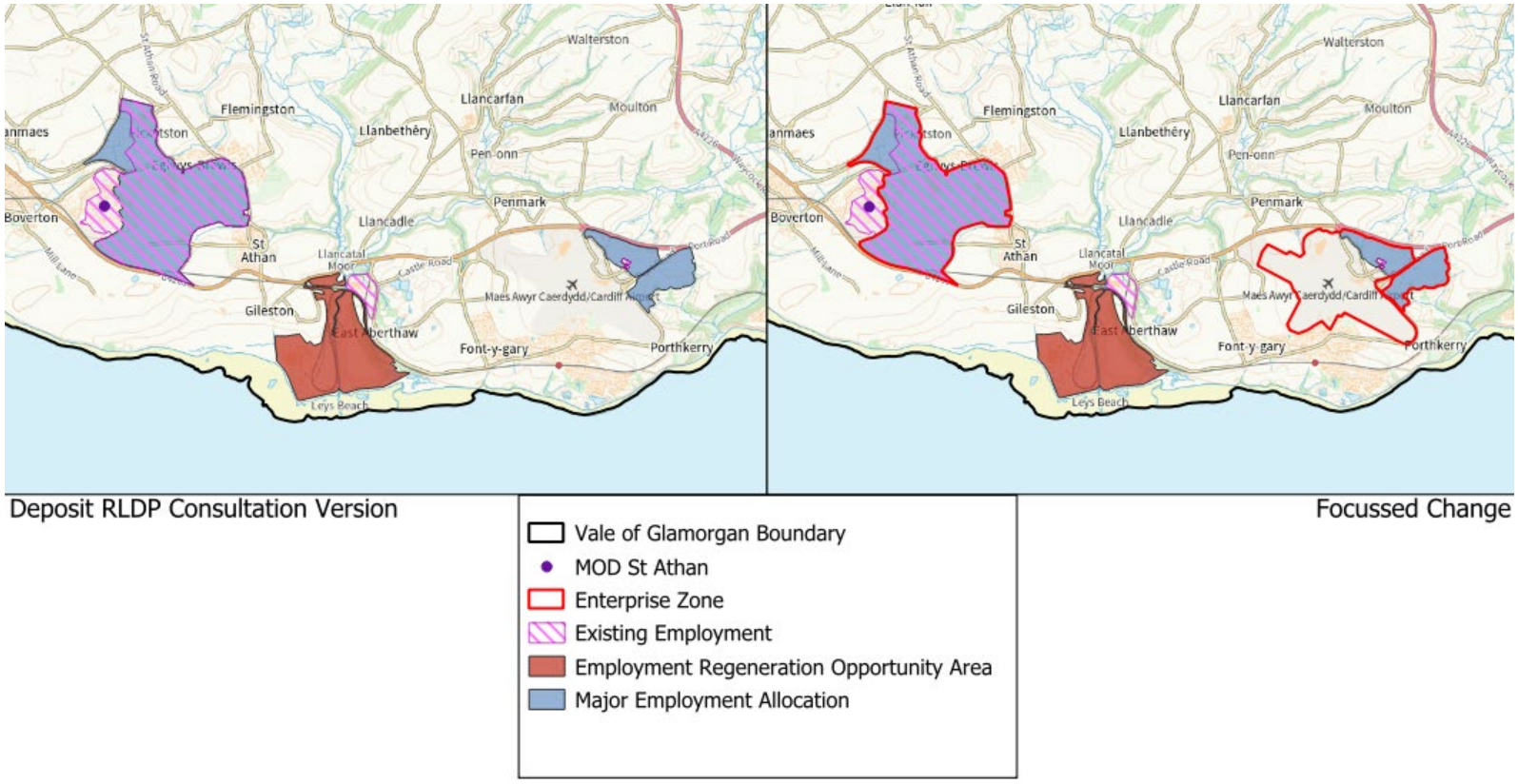
			viable and resilient to change		centres against baseline data	baseline data	Annual retail centre surveys	
FCA17	Appendix 3 – Monitoring Framework – Supplementary Planning Guidance	Amendment	Following adoption of the RLDP, the Council shall undertake a review of all SPG adopted under the LDP. Existing adopted SPGs to be reviewed: • Affordable Housing • Barry Development Guidelines • Barry Garden Suburb • Biodiversity and Development • Cardiff Airport and Gateway Development Zone • Conservation Areas in the Rural Vale • Conversion of Renovation of Rural Buildings • County Treasures • Design in the Landscape • Model Design Guide Wales • Economic Development, Employment Land and Premises • Minerals Safeguarding • Parking Standards • Penarth Conservation Area • Planning Obligations • Public Art in New Development • Renewable Energy					In order to address the Inspectors Preliminary Question that will be posed to the Council in respect of SPG preparation.

			• Residential and Householder Development • Retail and Town Centre Development • Sustainable Development • Tourism and Leisure Development • Travel Plan • Trees, Woodlands, Hedgerows and Development New SPG will be produced where considered necessary including on the following topics: • Green Infrastructure • Healthy Placemaking • Net Zero Dwellings • Hot Food Takeaways • Open Space Provision • Suitable Alternative Natural Greenspace • Sustainable Urban Drainage Systems	
FCA18	Appendix 7	Amendment	Include a full list of statutorily designated sites in Appendix 7	Amendment in response to representation by NRW (6642)

Proposals Map

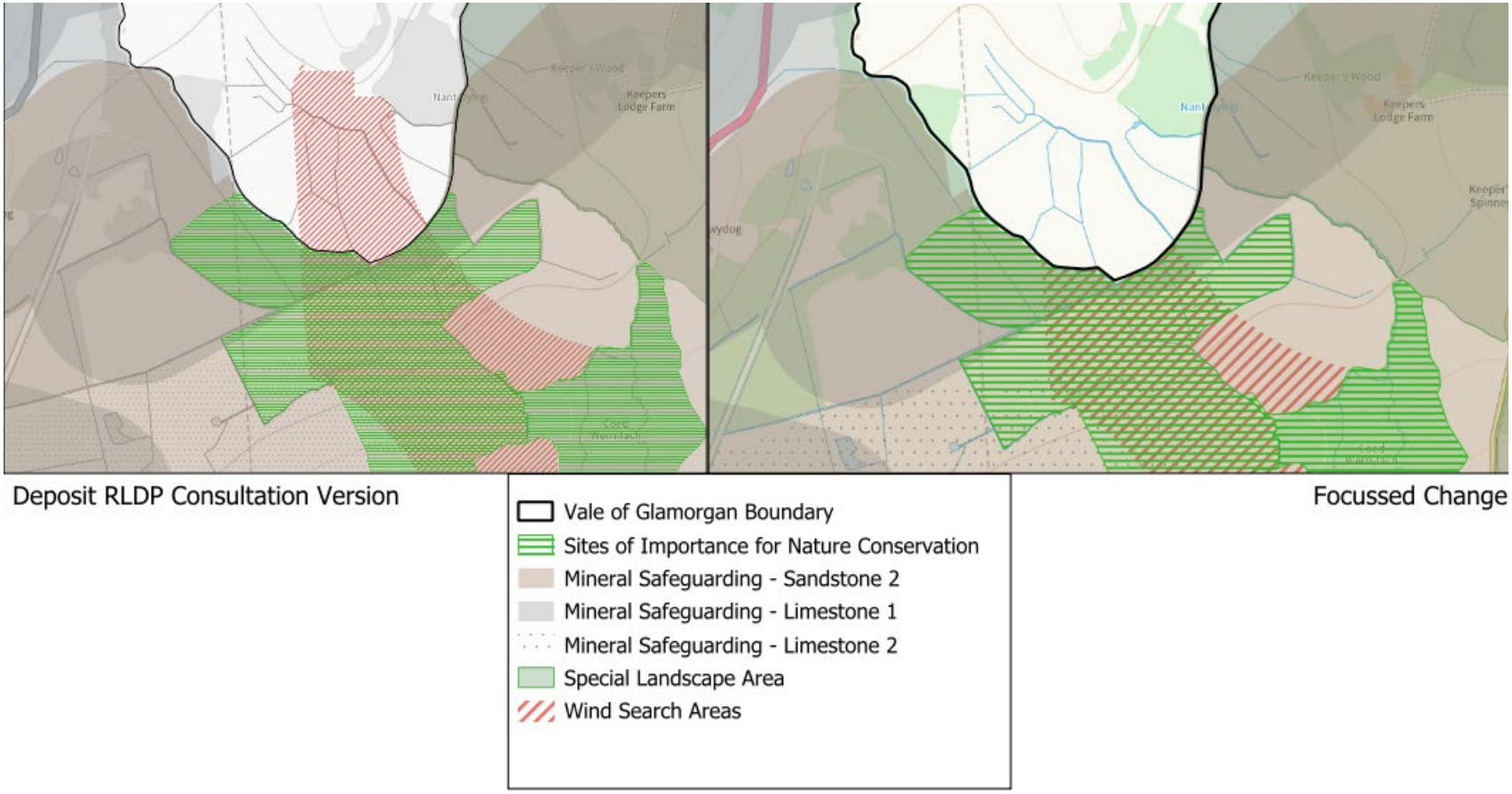
	Proposal	Type of Change	Amendment	Reason
FCM1	Cardiff Airport and Bro Tathan Enterprise Zone	Amendment	Show the Enterprise Zone boundary on the Proposals Map.	Amendment in response to representation by Welsh Government (5127)

Image Extract of Focussed Change:



	Proposal	Type of Change	Amendment	Reason
FCM2	CC3 North East of Ystradowen Wind Search Area	Amendment	Amend boundary to remove the part of the search area that lies outside of the Vale of Glamorgan Boundary	To correct a mapping error

Image Extract of Focussed Change:



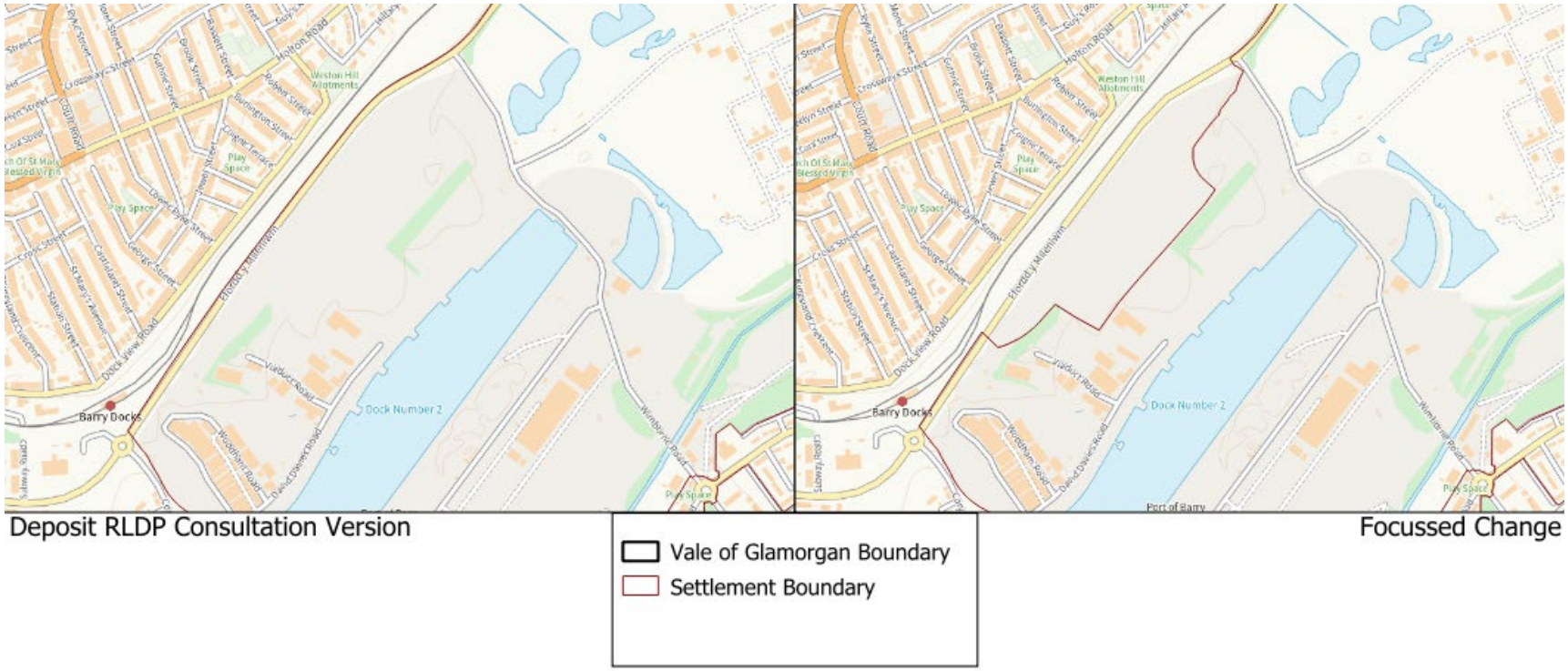
	Proposal	Type of Change	Amendment	Reason
FCM3	DNP2 (6) Green Wedge between Llantwit Major and Llanmaes	Amendment	Amend Green Wedge boundary at West Croft to align with the boundary identified in the Green Wedge Background Paper.	To ensure consistency between the Proposals Map and BP27 Green Wedges - Merchant (7055).

Image Extract of Focussed Change:



	Proposal	Type of Change	Amendment	Reason
FCM4	Barry Settlement Boundary	Amendment	Extend the settlement boundary to include Land at Ffordd y Mileniwm.	To ensure consistency between the Proposals Map and BP12A Employment Supplementary Paper - Cadoc Castle Land Developments (7181)

Image Extract of Focussed Change:



	Proposal	Type of Change	Amendment	Reason
Part of FC22 and FC23	CI1 Provision of open space	Amendment	Include the following additional sites that are safeguarded for open space on the Proposals Map: CI1.1 Land at Cosmeston Lakes Country Park CI1.2 Land at Porthkerry Country Park	To ensure consistency between FC22 and FC23 and the Proposals Map

Image Extract of Focussed Change (CI1.1)

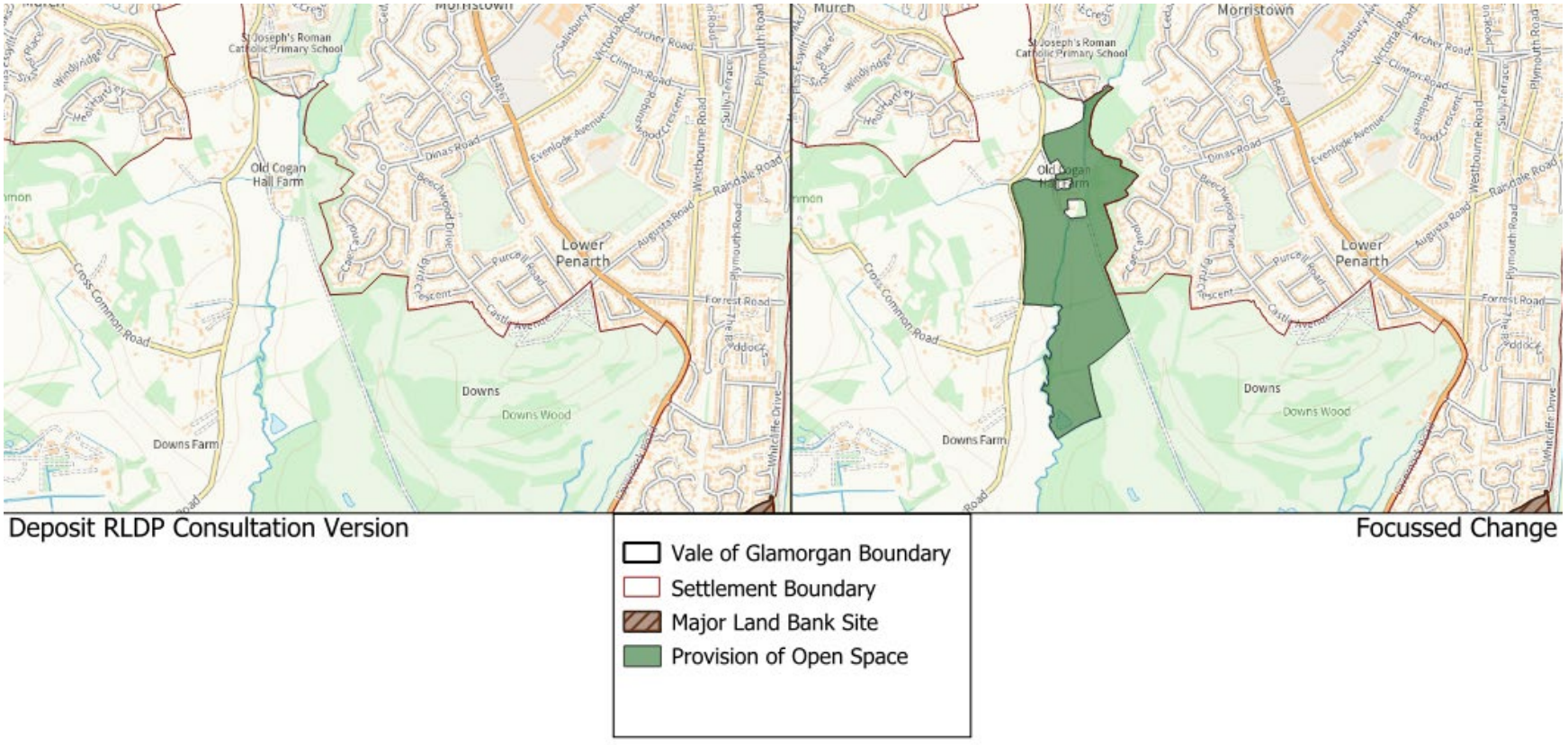
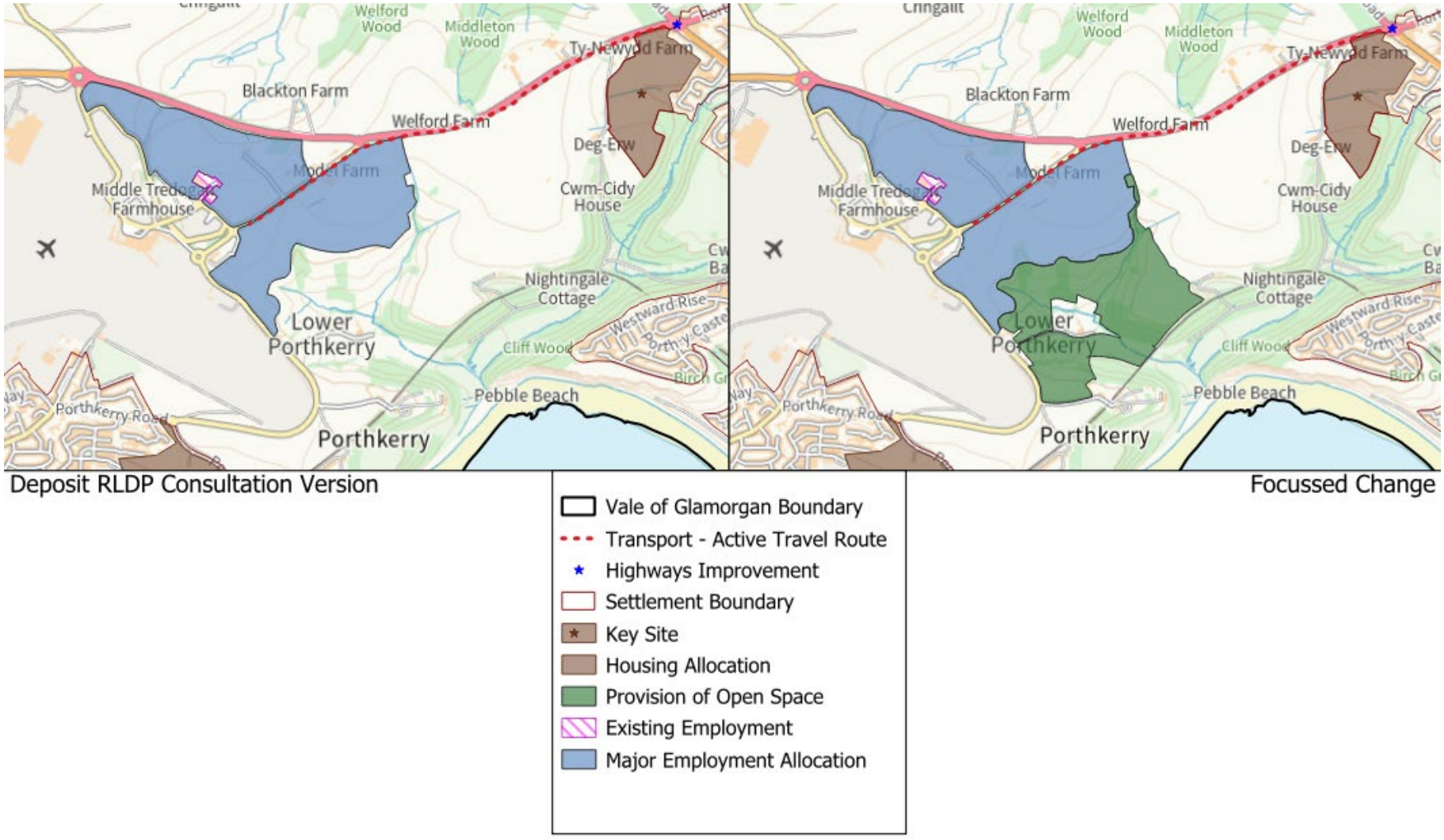
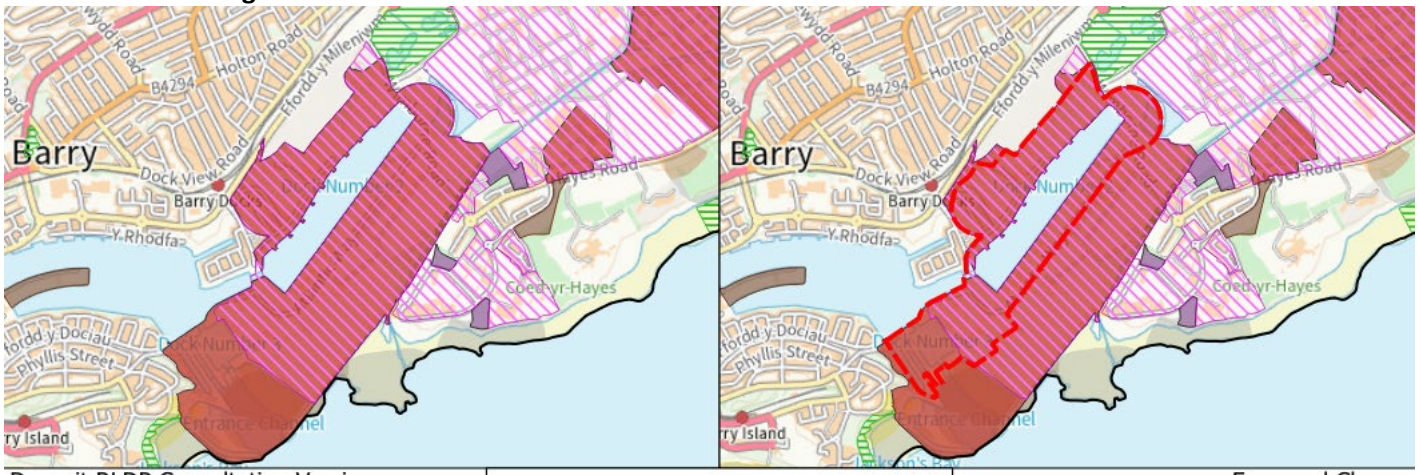


Image Extract of Focussed Change (CI1.2)



	Proposal	Type of Change	Amendment	Reason
FCM5	SP18 Sustainable Provision of Minerals	Amendment	Show the Sand and Gravel Wharf Safeguarding layer on the Proposals Map.	To correct an omission

Image Extract of Focussed Change:

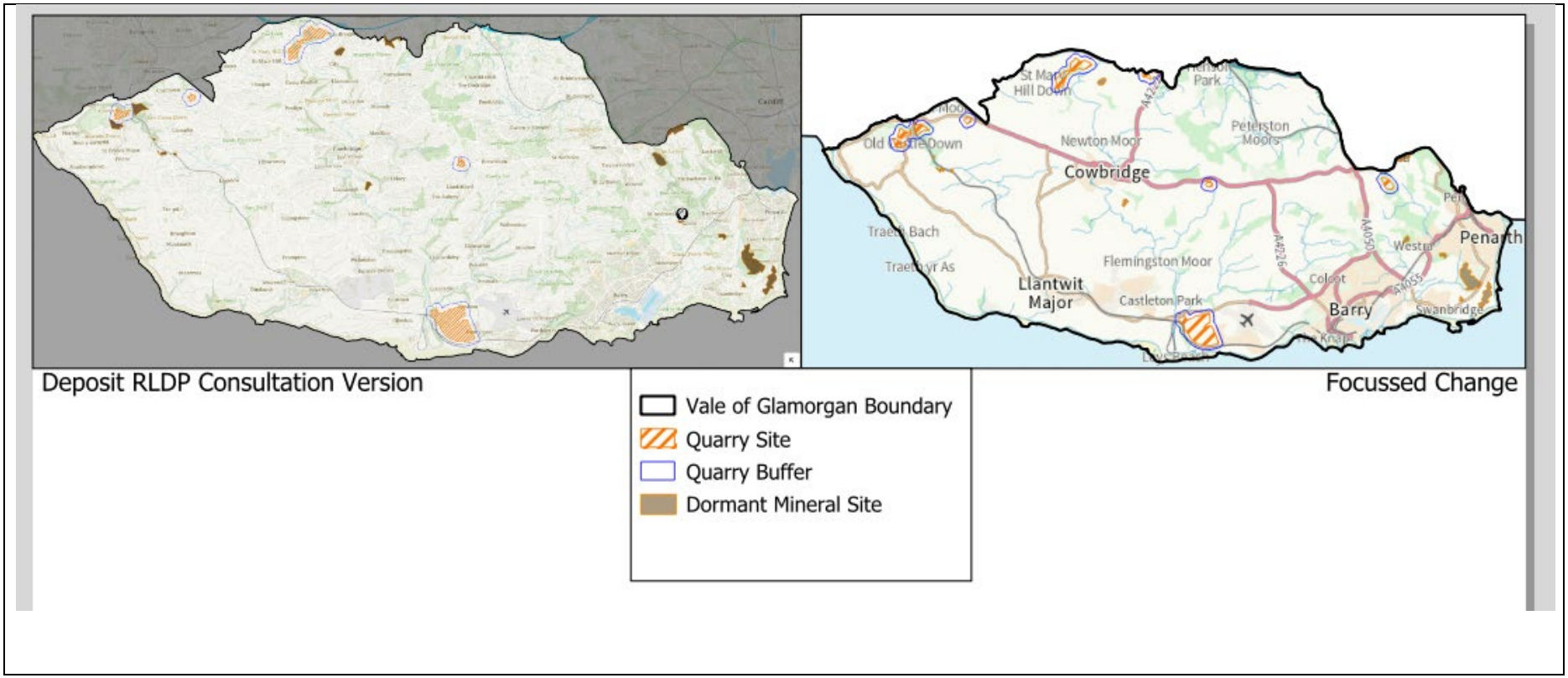


Deposit RLDP Consultation Version

Focussed Change

- Vale of Glamorgan Boundary
- Housing Allocation
- Sand and Gravel Wharf Safeguarding
- Existing Employment
- Employment Regeneration Opportunity Area
- Local Employment Allocation
- Sites of Importance for Nature Conservation
- Mineral Safeguarding - Sandstone 2
- Mineral Safeguarding - Limestone 1
- Mineral Safeguarding - Sand and Gravel 1
- Mineral Safeguarding - Sand and Gravel 2

	Proposal	Type of Change	Amendment	Reason
Part of FC28	SP18 Sustainable Provision of Minerals and MIN3 Dormant Minerals Sites	Amendment	Move the following sites from the 'Dormant Minerals site' category to 'Quarry Site:' • Ewenny • Forest Wood • Pant • Wenvoe	To ensure consistency between FC25 and the Proposals Map Inactive quarries were shown on the 'Dormant Minerals Site' layer in the Deposit RLDP Proposals Map but should be shown on the 'Quarry Site' layer for consistency with the approach in the adopted LDP where sites have an extant permission and there is a realistic prospect of them being worked.


Deposit RLDP Consultation Version
Vale of Glamorgan Boundary
Quarry Site
Quarry Buffer
Dormant Mineral Site
Focussed Change
Cowbridge
Newton Moor
Peterston Moors
Llantwit Major
Castleton Park
Flemingston Moor
Barry
Penarth
Swanbridge
Coloot
Traeth Bach
Traeth yr As

SCHEDULE OF MINOR EDITORIAL CHANGES

	Policy/Paragraph No	Type of Change	Amendment	Reason
MC1	Pages i-iii	Factual update	Remove consultation information from the front end of the plan.	Factual update to reflect the stage of plan preparation
MC2	Introduction – Paragraph 1.2	Factual update	Include expiry date for the Plan as 31st March 2036.	Factual update as required by the Development Plans Manual
MC3	Paragraph 5.7	Typographical correction	Amend as follows: "**complementary** ~~complimentary~~ to the wider growth aspirations."	Typographical correction
MC4	Paragraphs 2.10 and 2.11	Typographical correction	Remove the hyphen in 'South-Central Area Statement' to read 'South Central Area Statement' in paras 2.10 to 2.11	Typographical correction to address a representation by NRW (6644)
MC5	Paragraph 2.81	Typographical correction	Amend paragraph 2.81 to read '6 broad ecosystems' instead of '6 broad habitat types.'	Typographical correction to address a representation by NRW (6650)
MC6	Vision	Factual update	Replace reference to marina with watersports centre: 'The town and local retail centres are vibrant places, while the new ~~marina~~ **watersports centre** at Barry Waterfront and revitalised Barry Island provide all year-round tourism.'	Factual update in response to representations from HBF (5882) and Reed (5406).
MC7	Policy SP2 Policy text and Paragraph 6.10	Typographical correction	Amend the Policy follows: "Development within these settlements will reflect the **complementary** ~~complimentary~~ role" and amend paragraph 6.10 to read "**complementary** ~~complimentary~~ role"	Typographical correction

	Policy/Paragraph No	Type of Change	Amendment	Reason
MC8	SP5 Creating Healthy and Inclusive Places and Spaces – Supporting text Paragraph 6.61	Typographical correction	Amend the organisation names as follows in Paragraph 6.61: Cardiff and Vale ~~Local~~ **University** Health Board and ~~Public Health~~ Wales Health Impact Assessment **Support** Unit **(Public Health Wales)**.	Correction of organisation names in response to representation from CAVUHB (6718).
MC9	Policy SP10 and TR1	Factual update	Update Policies SP10 and TR1 and their supporting texts to refer to walking, **wheeling** and cycling. There will also be consequential changes to paragraph 6.38.	Factual update to reflect updated terminology as set out in representation by Cardiff and Vale University Health Board (6725)
MC10	TR1 Transport Proposals - Paragraph 6.194	Typographical corrections	Amend as follows: "A preliminary feasibility study was undertaken by the Council in May 2022[12] to understand the potential for a new railway station located on the Vale of Glamorgan Line. This study considered 5 potential locations sited along the line to the south of St Athan with the central location (Section C) being considered the most appropriate location for the station given it's ~~the~~ proximity to St Athan (including RLDP housing allocations) and the potential for walking and cycling connectivity. Accordingly, land has been ~~safeguarding~~ **safeguarded** to protect the land from development that may prejudice the provision of a new station to serve St Athan, which includes land associated with the Key housing allocation HG1 KS5 Land to the West of St Athan. This area would be the Council's preferred location for a new station	Typographical corrections

	Policy/Paragraph No	Type of Change	Amendment	Reason
			providing an opportunity for park and ride facilities and commercial development ~~complimentary~~ **complementary** to a transport interchange and also includes enhanced walking and cycling connections to St Athan. The transport interchange will need to provide bus bays, taxi parking bays and cycle parking. An access to the site will be provided as part of the signalised junction access arrangements for Land to the West of St Athan (HG1 KS5)."	
MC11	Paragraph 6.213 (supporting text for Policy RCS1)	Factual update	The Vale of Glamorgan have ~~committed to producing a series of~~ **recently adopted** Placemaking Plans for its **four** towns **(Barry, Penarth, Cowbridge and Llantwit Major).**	Factual update to reflect current status of Placemaking Plans
MC12	Paragraph 2.269	Typographical correction	Make the following amendment to this sentence: "Cardiff and Vale College have been granted planning permission for a college campus on ~~2.7ha~~ **3.7ha** of land to the south-east of the existing Airport Business Park."	Typographical correction
MC13	SP14 Employment Growth and Paragraph 6.271	Typographical correction	Amend the Policy to read "**Complementary** ~~Complimentary~~ ancillary non-B uses ~~maybe~~ **may be** permissible" and supporting text Paragraph 6.271 to read "provision of **complementary** ~~complimentary~~ ancillary uses"	Typographical correction
MC14	EMP4 Non-Employment Proposals on Existing Employment	Typographical correction	In the first paragraph of the policy text amend as follows: Development proposals on existing employment sites and premises identified in Policy ~~EMP2~~ **EMP3** will be subject to the following restrictions	To amend an incorrect policy cross reference and correct typographical errors.

	Policy/Paragraph No	Type of Change	Amendment	Reason
	Areas and Premises and paragraph 6.296		Criterion 2 amend to read "the use would be **complementary** ~~complimentary~~ to neighbouring uses" Paragraph 6.296 "provide a **complementary** ~~complimentary~~ benefit"	
MC15	EMP5 New Employment Proposals Within Settlements	Typographical correction	In the first paragraph of the policy text amend as follows: Proposals for new employment uses outside of allocated sites **(Policy SP14)** or existing employment areas ~~identified in~~ **(**Policy ~~EMP2~~ **EMP3)** will only be permitted where:	To amend an incorrect policy cross reference.
MC16	Policy CC4 – Renewable, Low and Zero Carbon Energy Generation, paragraph 6.334 and 6.346	Factual update	Replace references to Developments of National Significance (DNS) with Strategic Infrastructure Projects (SIP) in paragraphs 6.344 and 6.346.	From the 15 December 2025 the Developments of National Significance (DNS) system has been replaced with the Significant Infrastructure Projects (SIP) system.
MC17	SP19 Green Infrastructure – Supporting Text paragraph 6.396	Typographical correction	Amend as follows: "When identify**ing** opportunities, a site and its surrounding context are key considerations, alongside the GIA.	Typographical correction.
MC18	Appendix 2 - HG1 KS4 Church Farm, St Athan	Typographical correction	Delete duplicate reference to the 'Historic Environment Record identifies evidence of significant Medieval activity in the immediate vicinity, a desk-based assessment and geophysical survey will be required'	Typographical correction.

	Policy/Paragraph No	Type of Change	Amendment	Reason
MC19	Appendix 2 – KS1-KS5	Typographical correction	Change policy references from SP14 KS1-KS5 to HG1 KS1-KS5	Typographical correction.

SCHEDULE OF CHANGES TO BACKGROUND DOCUMENTS (OTHER CHANGES)

	Document	**Type of Change**	**Amendment**	**Reason**
OC1	Constraints Map	Amendment	Include the Severn Estuary Ramsar and SPA on the constraints map	To correct an omission
OC2	Constraints Map	Amendment	Show the Local Nature Reserves on the constraints map	To correct an omission
OC3	BP9A – Housing Land Supply and Housing Trajectory	Update	Update to incorporate the latest housing monitoring data and updated trajectory forecasts (see FC6 and FCA1)	Consequential changes in light of 1st April 2026 housing monitoring and updated trajectory forecasts.
OC4	BP25 - Minerals	Amendment	Update to incorporate Focussed Change FC28 on Dormant Quarries	To ensure consistency between the Background Paper, Proposals Map and Deposit Plan (as amended by Focussed Changes)

OC5	BP31 – Open Space	Amendment	Review BP31 to ensure that areas of open space that are no longer available due to planning applications for alternative uses are removed. Remove site 779 and site 505, both in the ward of St Nicholas and Llancarfan from the BP31 calculation and make any consequential changes to the calculations.	Amendment in response to representation by Perry (5066).
OC6	BP44 - Infrastructure Delivery Plan	Amendment	Update to incorporate Focussed Changes FCA2-FCA14	To ensure consistency between the Appendices and the Background Paper

OC7	Green Infrastructure Strategy	Amendment	The following changes are proposed to the Green Infrastructure Strategy: • Add a reference to Vale Local Nature Partnership local Nature Recovery Action Plan and the Vale 30 by 30 ambition in Sections 1 and 2.2 and Box 2.5 and Appendix 1. • Update paragraphs 2.2.2-2.2.3 and Box 2.4 to reflect the Deposit stage of the RLDP. • Update the reference to the State of Natural Resources Report from 2020 to 2025 in Box 2.5 and update the relevant section in Appendix 1 to reflect the updated report. • Update Box 2.5 to reference the Wales National Marine Plan. • Amend paragraph 3.3.4 to read "The Severn Estuary **and Bristol Channel** ~~is~~ **are** also ~~a~~ potential source**s** of tidal flooding in the Vale." • Update paragraph 3.4.2 and Map 3.4 to reflect the SINC review findings. • Amend the references to four bathing beaches so that they correctly refer to six bathing beaches (paragraphs 3.3.1, 3.6.6 and appendix 2).	In response to representations from NRW (6676), Levett (4792) and Barry and Vale Friends of the Earth (6255)

OC8	Draft Healthy Placemaking SPG	Amendment	• Make reference to the Safer Parks document. • Amend Paragraph 5.24 as follows "The Good Food and Movement Framework (2024-2030) ~~for Cardiff and the Vale of Glamorgan brings together partners from the PSBs and the Regional Partnership Board to provide a regional response to how we can encourage people to be more active and have a healthier diet. This strategy focuses on collective action to create meaningful change in communities, schools, workplaces, and the environment over the next six years~~ **sets out where, in Cardiff and the Vale of Glamorgan, we will prioritise our collective efforts and how we will work together to create change; in the environment, across our settings and in our communities. It has been shaped locally by a wide range of ideas, perspectives and voices and describes how, together we will create environments, settings and opportunities that enable good food and movement for everyone in Cardiff and the Vale of Glamorgan."** • Amend Paragraph 6.7 as follows "To the achieve this, Strategic Policy SP5 requires developers to assess and understand the impact of their schemes on health and wellbeing through the application of either **the Council's Healthy Placemaking Screening Checklist provided at Appendix 1 or through undertaking** a Rapid Health Impact Assessment ~~or HIA screening tool~~ subject to the thresholds set out in Table 1." • Amend Paragraph 7.7 to read "Engagement with the local community early in the process is ~~encouraged~~ **expected**".	In response to representations from South Wales Police (6625) and CAVUHB (6713)

			• Addition line to Paragraph 7.18 “Early dialogue with the local community and organisations provides the opportunity to identify more specific needs within the local area, and shape how the design of the development can respond to addressing the community aspirations, **especially those who may be directly impacted (adjoining streets and areas), using accessible and clear materials, resources and language to provide engagement opportunities in a place and time accessible to the community.**” • Include a new paragraph in Section 7 to reference the quality of HIAs. • Include a new paragraph to Section 9 to address safety in parks. • Include an additional paragraph to state that CAVUHB will also be consulted formally on major planning applications.	