

Meeting of:	<b>Cabinet</b>
Date of Meeting:	<b>Thursday, 11 July 2024</b>
Relevant Scrutiny Committee:	Environment and Regeneration
Report Title:	Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021-2036 Preferred Strategy Initial Consultation Report
Purpose of Report:	To advise Cabinet of the issues raised through representations received during the public consultation exercise undertaken between December 2023 and February 2024 in respect of the Preferred Strategy for the Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021-2036
Report Owner:	Cabinet Member for Community Engagement, Equalities and Regulatory Services
Responsible Officer:	Marcus Goldsworthy, Director of Place
Elected Member and Officer Consultation:	<p>Head of Sustainable Development, Operational Manager for Planning and Building Control, Lawyer - Legal Division, Operational Manager Accountancy, Head of Strategy, Community Learning and Resources, Operational Manager, Strategy and Resources, Sustainable Communities for Learning Project Manager, Operational Manager, Neighbourhood Services, Healthy Living and Performance, Head of Neighbourhood Services and Transport, Operational Manager Engineering, Group Manager Transport Services, Senior Sustainable Transport Officer, Engineering Manager – Environment, Engineering Manager Highways Development, Head of Housing and Building Services, Operational Manager, Public Housing Services, Housing Development Manager, Finance Support Manager, Operational Manager for Regeneration, Team Leader Countryside Services, Ecologist, Operational Manager (Property), Programme Manager Project Zero,</p>

	<p>Team Manager (Shared Regulatory Services), Operational Manager, Corporate Communications, Participation, Equalities and Directorate Development.</p>
<p>Policy Framework:</p>	<p>This is a matter for Executive decision by Cabinet and for referral to Full Council for approval following referral to Environment and Regeneration Scrutiny Committee.</p>
<p>Executive Summary:</p> <ul style="list-style-type: none"> <li>• This report has been prepared to advise Members of the representations made on the Vale of Glamorgan RLDP Preferred Strategy.</li> <li>• It seeks endorsement of proposed changes to the Preferred Strategy in light of representations made and seeks approval that the Preferred Strategy, as amended, should form the basis for the ongoing preparation of the Deposit Plan.</li> <li>• The Welsh Government representation on the Preferred Strategy is included as Appendix 1.</li> <li>• The Initial Consultation Report is attached at Appendix 2.</li> </ul>	

## **Recommendations**

1. That the contents of the report are noted.
2. That Cabinet refers this report to Environment and Regeneration Scrutiny Committee for their consideration. Should the Committee raise no further matters for Cabinet consideration, the report be referred to a meeting of Full Council on 30th September, 2024 for:
  - a) endorsement of the actions set out in the Initial Consultation Report
  - b) approval of the Replacement Local Development Plan (RLDP) Preferred Strategy as a basis for the ongoing preparation of the Deposit RLDP.

## **Reasons for Recommendations**

1. To outline to Members the issues raised during the 10-week public consultation exercise on the RLDP Preferred Strategy.
2. To seek approval for the proposed changes to the Preferred Strategy as set out in the Initial Consultation Report and to allow officers to progress with preparation of the Deposit RLDP in accordance with the Council's approved Delivery Agreement.

## **1. Background**

- 1.1** The RLDP is a key Council policy document that underpins many of the Council's corporate strategies. Based on a robust evidence base, the RLDP will allocate land for development, designate areas for protection and contain 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.
- 1.2** One of the key stages of the plan process is the preparation of a Preferred Strategy for the RLDP. The Preferred Strategy provides the strategic direction for the development and use of land in the Vale of Glamorgan over the RLDP period (2021 to 2036) and identifies how much sustainable growth is needed and where this growth will broadly be located. The preparation of the Preferred Strategy has been guided by a framework of key inputs that includes national legislation and policy, local and regional policies and strategies and an evidence base relating to key local issues that the Plan should seek to address. It provides the strategic context for the preparation of more detailed policies, proposals and land use allocations which will be included in the Deposit RLDP.
- 1.3** At its meeting of 20th November, 2023, Full Council endorsed the Preferred Strategy for public consultation for a 10-week period (Minute 531 refers). The public consultation was held between 6th December, 2023 and 14th February, 2024.
- 1.4** The Preferred Strategy, including the level of growth and spatial distribution of growth, was developed through engagement with key stakeholders, including a series of workshops with Elected Members, Town and Community Councils and representatives from the Public Service Board, as well as sessions with the Equalities Consultative Forum and health professionals as part of a rapid participatory Health Impact Assessment. Full details on how this influenced the Preferred Strategy is contained within BP1 Engagement Report, which forms one of the background papers to the Preferred Strategy.
- 1.5** The consultation on the Preferred Strategy involved a range of consultation methods to maximise engagement. This consultation was carried out in accordance with the Community Involvement Scheme set out within the DA and included two online sessions held in December 2023 and seven in person engagement sessions in locations across the Vale of Glamorgan in January 2024. The specific and general consultation bodies listed within Appendix 1 of the DA (together with other interested parties who had requested to be included on the RLDP consultation database and/or to be kept informed of RLDP consultations) were notified at the start of the consultation.

- 1.6** An online hub was created on Participate Vale to provide a single point of information and engagement on the draft and the consultation was promoted as follows:
- An animation and series of infographics were produced to present the strategy in a simple and engaging way for residents;
  - Emails sent to approximately 5,000 residents who had subscribed for updates on Council consultations via the Participate Vale database;
  - Printed promotional materials were made available at the Council’s Civic Offices and Council run libraries;
  - Posters advertising the consultation were displayed in these libraries and other key locations where sessions were held;
  - Partner organisations, Town and Community Councils and elected Members were encouraged to share details of the consultation with residents and other stakeholders.
- 1.7** The Council’s Communications Team also ran a series of social media notifications during the 10-week period aimed at raising awareness of the consultation and providing information on the public engagement sessions and on how to comment on the Preferred Strategy.
- 1.8** As part of the consultation, comments were invited on the Preferred Strategy as well as the supporting background evidence to the Preferred Strategy - the Initial Integrated Sustainability Appraisal (ISA) Report and the Habitats Regulations Assessment (HRA) of the Preferred Strategy. Whilst not part of the formal process, an opportunity was also given for representors to submit comments on the 150 candidate sites that had been submitted as part of the Call for Candidate Sites in 2022 and the supporting documents that formed the evidence behind the policies. The consultation offered a further opportunity to submit new sites as part of a second call for candidate sites.
- 1.9** Regulation 16 of the LDP Regulations requires the Council to prepare an Initial Consultation Report (ICR) that sets out how the consultation was publicised, who was involved, and to address the main issues raised through the representations submitted as part of the consultation process. The Vale of Glamorgan RLDP 2021-2036 Initial Consultation Report - Pre-Deposit ICR has been prepared and is included as Appendix 1.
- 1.10** The ICR considers the issues raised through the representations and provides an officer response to them and a recommendation on what action, if any, is required. A number of changes are proposed to the wording of the Preferred Strategy to improve clarity.

Many of the issues raised are detailed matters that will be addressed through the provision of further information and evidence that will inform the Deposit Plan. The ICR also sets out where this is the case.

## **2. Key Issues for Consideration**

**2.1** A total of 857 individuals and organisations made representations on the RLDP Preferred Strategy and its supporting documents. 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:

- Preferred Strategy – 2,853 duly made representations, comprising 225 representations of support, 425 comments and 2,203 objections.
- Candidate Sites Register – 312 duly made representations, comprising 72 representations of support, 25 comments and 215 objections.
- Initial Integrated Sustainability Appraisal – 7 duly made representations.
- Habitats Regulations Assessment of the Preferred Strategy – 1 duly made representation .
- Other Supporting documents – 15 duly made representations.

**2.2** One e-petition was received in respect of key site SP4 KS1 North East Barry and SP4 KS2 Land to the North of Dinas Powys. This petition received 244 signatures. In accordance with the approach to handling representations in the DA, 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.

**2.3** It should be noted that where representations suggest additions or changes to the wording of any element of the Preferred Strategy these have been treated as objections.

### **Specific Consultation Bodies**

**2.4** The Welsh Government (WG) submitted its comments on the Preferred Strategy on 13th February, 2024. The comments were split into two sections, the first in respect of the general conformity of the Preferred Strategy to National and Regional Planning Policy and Context, and the second in respect of Core Matters that need to be addressed by the Council prior to publication of the Deposit RLDP.

**2.5** In regard to general conformity of the plan, no objection was raised by the Welsh Government to the Preferred Strategy and the Welsh Government is of the opinion that the Preferred Strategy is in general conformity with the National Development Framework: Future Wales.

**2.6** While the Welsh Government also supported the Council's joint statement with Cardiff Council that considers the relationship between Cardiff and the Vale from a population, housing, commuting and transport perspective, the Welsh Government wished to see further wider regional collaboration be undertaken to demonstrate how regional collaboration has influenced the scale of growth in the Vale of

Glamorgan and the relationship to all adjoining authorities, including Bridgend and Rhondda Cynon Taff. In this regard and in response, Members are advised that a regional assessment of future growth across the Cardiff Capital Region (CCR) has been commissioned by the 10 CCR authorities which assesses the scale of growth that could reasonably be delivered across the region. This will form part of the evidence base for the Deposit RLDP. Officers will continue to work collaboratively with adjoining authorities on plan preparation.

- 2.7** In relation to the Core Matters, the Welsh Government considers that the Spatial Strategy, the distribution and level of housing and employment growth proposed by the Council is in general conformity with Future Wales, and as such no objections were raised in respect of these elements of the Preferred Strategy.
- 2.8** The Welsh Government also raised a number of points of clarification which the Council will address at the Deposit Plan Stage. These relate to the RLDP Settlement Hierarchy, delivery and implementation of Key Sites, Gypsy and Traveller Site Provision, Renewable Energy, Minerals, the consideration of the Best and Most Versatile Agricultural Land in the assessment of Candidate Sites, and the provision of additional information in respect of the potential impact of the RLDP on the Welsh Language. The WG representation is included in Appendix 1 of this report and the initial response to these matters is provided within Annex 1 of the ICR.
- 2.9** Natural Resources Wales (NRW) also submitted comments to the Preferred Strategy during the consultation period. The representations received suggested a number of amendments to the vision, strategic objectives, and strategic policies of the Preferred Strategy which the Council shall incorporate where appropriate into the Deposit RLDP.
- 2.10** NRW also submitted site specific representations in respect of the two of the Key Sites identified within the Preferred Strategy, namely, SP4 KS1 North East Barry and SP4 KS2 North of Dinas Powys, although comments on other sites had been received as part of engagement prior to the consultation. NRW raise concerns about the scale of the development at North East Barry and the proximity to the Barry Woodlands SSSI. NRW also raised concerns that the development would create risks from unauthorised and unmanaged public access, which had been experienced elsewhere in the Barry Woodlands SSSI at Pencoedre West. NRW consider that there is scope to reduce the developed area of the site and enable a sustainable design that reduces the potential for impacts upon the SSSI, whilst also maintaining, enhancing and managing the important retained and created habitats on site. Advice has also been provided on avoiding built development in the southern part of the site, which is located within the flood plain, and suggested the further masterplanning is informed by ecological surveys. In this regard the Council has relayed these concerns to the promoters of sites, and it is intended that site layouts will be amended to reflect the comments of NRW. This will include appropriate buffers for SSSI woodlands and maximising opportunities for biodiversity net benefit to increase connectivity between the currently fragmented woodland parcels. No built development has been identified in the flood risk area in the south of the site.

- 2.11** In respect of SP4 KS2 North of Dinas Powys, it is reiterated that masterplanning will be important in ensuring constraints for ecological surveys are carefully considered and that the masterplan would need to include appropriate mitigation and compensation. In response to these comments, the Council is committed to continuing to work closely with NRW as part of the master planning of the key sites to ensure that the concerns raised are addressed to the satisfaction of NRW.
- 2.12** Dwr Cymru Welsh Water (DCWW) have provided general comments on the existing water infrastructure capacity associated with the Key Sites within the Preferred Strategy and have identified where additional investment would be required to support planned growth. DCWW have requested that Hydraulic Modelling Assessments are undertaken on the key sites, however, they have advised that this work would be expected prior to a planning application, not at the development plan stage. DCWW have advised that the Cog Moors Wastewater Treatment Works (WwTW) has capacity to accommodate domestic foul flows in the Eastern Vale but that capacity for the sites in the Western Vale that are within the catchment area of West Aberthaw WwTW is limited. Improvements to capacity will be required over the plan period. Further infrastructure investment will be taking place as part of DCWW's asset management plan (AMP) programme.

### **Key Issues Raised**

- 2.13** In addition to representations from statutory consultees, representations were received from a range of stakeholders, 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 Preferred Strategy.
- 2.14** Most of the representations received objected to housing and employment allocations identified within the Preferred Strategy or sought the inclusion of sites previously discounted through the Candidate Site Assessment Process.
- 2.15** Many representations sought amendments to the wording of a variety of elements of the Preferred Strategy including strategic objectives, policies and/or supporting text. Comments were also made in respect of supporting documents. Any proposed changes arising from the Preferred Strategy consultation responses will be included in the Deposit Plan which shall be subject to further statutory public consultation in accordance with the timetable set out in the DA.

## **3 Key Issues Raised through the Consultation**

### **Vision, Themes and Strategic Objectives**

- 3.1** Representations were received in respect of the Vision (58 responses), Themes (56 responses) and Strategic Objectives (484 responses). Representations made in support of the RLDP Vision and Objectives commented that it was aspirational and ambitious, promoted economic growth and sought to address the challenges of climate change. Conversely, objections submitted challenged the ability of the



Council to deliver the RLDP Vision on the grounds that it was overly ambitious, or that the Vision should be shortened.

- 3.2** Objectors also suggested that the proposed housing and employment allocations and the spatial distribution of housing proposed within the strategy ran contrary to the delivery of the RLDP Vision and Objectives, e.g. that the proposed level of growth and identification of greenfield sites would have a detrimental impact on climate change and protecting and enhancing the natural environment. Conversely, others argued that insufficient levels of housing in rural areas would not meet the aspirations for the Rural Vale as set out in the Vision. The Preferred Strategy seeks to align housing, employment, services and facilities to reduce the need to travel as well as focusing development in locations well served by existing and proposed rail stations and in areas with good bus links. Integral to meeting the objective on climate change is reducing the need to travel by car and the sites that have been identified in the Preferred Strategy are in sustainable locations where this could be achieved. The key sites are primarily of a scale that could deliver a mix of uses. The key residential led sites chosen are greenfield as there are insufficient brownfield sites in sustainable locations available to meet the housing requirements. However, the proposed sites are primarily improved grassland with limited ecological value and all have a real opportunity for biodiversity net benefit to be achieved and to protect the areas of highest value.

### **Spatial Strategy**

- 3.3** In developing the RLDP Preferred Strategy the Council considered the following 4 spatial strategy options, with Option 4 being the preferred option.
- Option 1 – Continuation of the adopted LDP Growth Strategy.
  - Option 2 – Dispersed Growth.
  - Option 3 – Focused Growth.
  - Option 4 – Sustainable Transport Oriented Growth.
- 3.4** A total of 65 representations were received in respect of the spatial strategy options (23 in support of the preferred option, 37 objections and 5 comments). Representations made in support of the Preferred Strategy thought transport orientated growth was correct and supported national and regional policy, that it responded to affordable housing need identified, and that placemaking would enable connected communities.
- 3.5** Objections to the Spatial Strategy suggested that there is an over reliance on a small number of larger settlements to deliver housing growth, placing pressure on existing infrastructure, and that there are limited opportunities for sustainable transport. Representations also considered that the Spatial Strategy ignored opportunities for growth in rural settlements where the current adopted LDP has successfully delivered housing and that a proportion of growth should be directed to the rural Vale.

**3.6** Accordingly, representors considered that the Council should base the strategy on one of the other spatial strategy options. Support for these were:

- Spatial Options 1- Continuation of the adopted LDP Growth Strategy – 0 Representations in support.
- Spatial Option 2 – Dispersed Growth - 12 Representations in support
- Spatial Option 3 – Focussed Growth - 1 Representations in support.

**3.7** As set out in the evidence base, it is considered that option 4 continues to be the most appropriate basis for the Preferred Strategy as it best accords with national planning policy, would help deliver the RLDP Vision and Objectives and importantly is considered appropriate by Welsh Government.

### **Housing and Employment Growth**

**3.8** In preparing the RLDP, the Council considered a range of population growth scenarios to assist in the identification of the level of housing and employment growth that will be provided over the plan period. The RLDP Preferred Strategy proposes the provision of 8,679 dwellings over the plan period and is based upon the average annual build rate of 526 dwellings achieved during the first 10 years of the current adopted plan (7,890 dwellings) plus a further 10% flexibility allowance (789 dwellings). In terms of employment provision, the RLDP requires 67.80 ha of land with the capacity to support 5,338 jobs over the plan period, and closely aligns to the projected increase in working age population associated with the proposed level of housing over the plan period.

**3.9** A total of 88 representations were received in respect of the proposed level of housing growth - 20 in support, 55 objections and 13 comments. Representations objecting to the proposed level of housing included those that considered that the housing requirement was too high, that housing should be prioritised to local residents and not encourage inward migration, that empty homes should be brought into occupation first and that the growth would have a negative impact on existing infrastructure and would conflict with climate change mitigation and therefore should be reduced. Others felt that a higher level of housing would be appropriate as it would deliver more affordable housing and that the Council should be more ambitious regarding growth due to its position in a Future Wales national growth area.

**3.10** It is considered that the level of housing growth identified in the Preferred Strategy achieves the correct balance for the delivery of the Vision and Objectives as it would facilitate a more balanced demographic by encouraging in-migration of working age people. It will deliver much needed homes, including affordable housing, delivered on sites in sustainable locations. Notably, Welsh Government have raised no objection to the level of growth and consider the plan to be in conformity with Future Wales.

- 3.11** Representations were also received on Policy SP3 Housing Requirement and the housing land supply calculation. A number of objectors considered that the 10% flexibility allowance should be increased to 15-20% and that assumptions for non-delivery for rolled forward LDP sites and units with planning permission should be factored in. The flexibility allowance reflects the approach in the adopted LDP, where 10% was considered to be appropriate. It should be noted that not all undeveloped adopted LDP sites have been rolled forward – only those with developer interest that were realistically likely to be developed. In advance of the Deposit LDP, a housing stakeholder group will be set up with representatives from the housebuilding industry to discuss likely delivery rates on sites within the plan. This will be the opportunity to discuss the sites with planning permission to ensure that the sites included in the plan are realistically likely to proceed.
- 3.12** In respect of the proposed employment growth contained within the Preferred Strategy, a total of 13 specific representations were received of which 1 was in support, 6 Objections and 6 comments. Representations objecting to the employment land provision consider it to be too high and that there is a lack of evidence for demand. There was also concern that there are existing vacant employment premises within the Vale of Glamorgan that should be prioritised first. The employment land requirements are based on an Employment Land Study which considers supply and demand as well as past take up rates. The associated jobs figures have been aligned with housing growth.

#### **Settlement Hierarchy and Strategic Growth Area**

- 3.13** The Preferred Strategy identifies a settlement hierarchy in Policy SP2 comprising a key settlement (Barry), three service centre settlements (Cowbridge, Llantwit Major and Penarth), primary settlements (Rhoose, St Athan, Sully, Llandough, Dinas Powys, Wenvoe, Wick and Culverhouse Cross) and a fourth tier of minor rural settlements. Representations have been made that some settlements should be elevated or demoted in the settlement hierarchy based on their role. However, the settlement hierarchy is based on a robust Settlements Appraisal Review and it is considered that this hierarchy can be justified.
- 3.14** A Strategic Growth Area has been defined, reflecting the area within which growth would be targeted (Key Diagram and Policy SP1). This follows the rail corridor and includes the key, service centre and primary settlements with the exception of Wick, Culverhouse Cross and Wenvoe, which have no current or proposed rail access. Cowbridge, despite not being on the train line, has been included in the Strategic Growth Area as it is a sustainable settlement in its own right given the level of services and facilities. Outside of the Strategic Growth Area, development will be limited to small scale affordable housing led sites.
- 3.15** A total of 30 representations were received on the Strategic Growth Area (3 support, 21 object and 6 comments). The concerns raised were that the primary settlements of Wick, Culverhouse Cross and Wenvoe should be included within the strategic growth area due to good bus routes and that the Minor Rural Settlements should

accommodate more housing. Representations were also received that St Athan should not be in the Strategic Growth Area as it does not have a station. St Athan's position in the Strategic Growth Area is justified as it is on the rail line. Since the publication of the Preferred Strategy, the UK Government have announced funding to develop the business case for a new station. The settlements outside of the Strategic Growth Area do not have access to an existing or potential station and do not have the services or facilities to justify them being a sustainable location for significant levels of new development.

### **Key Housing Sites**

**3.16** The Preferred Strategy proposes the following 5 key sites that will assist in the delivery of the identified housing requirement. The key sites, together with the number of representations received on them, are listed in the table:

	<b>Respondents</b>	<b>Representations</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>
<b>SP4 KS1 North East Barry</b>	394	480	0	462	18
<b>SP4 KS2 Land North of Dinas Powys</b>	476	556	1	540	15
<b>SP4 KS3 Land at Readers Way, Rhoose</b>	60	97	0	88	9
<b>SP4 KS4 Land at Church Farm, St Athan</b>	51	151	2	134	15
<b>SP4 KS5 Land to the west of St Athan</b>	51	146	1	126	19

**3.17** The issues raised by objectors to the Key sites were primarily in respect of the potential negative impact of new development on the existing transport network (especially congestion), natural environment, air quality, flooding, loss of agricultural land, built environment, heritage and impacts on the character of existing settlements and loss of community identity.

**3.18** Objectors also cited the increased demand that new development would have on local facilities such as health services, schools and supporting infrastructure and in particular roads and public transport. The full consideration of the range of issues identified and the proposed response to them is set out within the ICR.

**3.19** It should be recognised that some of the concerns raised fall outside the remit of what the RLDP can realistically address. However, Officers are continuing to liaise with key stakeholders to address key concerns:

- **Health** - The Planning department meet regularly with Cardiff and Vale University Health Board (UHB) to discuss the RLDP and the implications of this on general medical services provision across the Vale. As part of the recent RLDP Preferred Strategy consultation, the representation from the UHB confirmed that it is

“undertaking an assessment of capacity across its services and will work with the Local Authority to address the impact of the preferred housing growth option in the Plan.” Following the completion of this assessment of capacity, it is anticipated that a background paper will be prepared collaboratively between the Local Authority and the UHB as part of the evidence base for the Deposit RLDP, setting out how the impact can be addressed in any areas where there are currently capacity concerns.

- **Education** - The Council has undertaken an initial assessment of educational need for each of the key housing sites identified within the Preferred Strategy. Further detailed assessment of the demand for additional educational provision generated from the proposed housing growth, as well as changes in the projected school age population over the plan period is currently being undertaken by the Council’s Sustainable Communities for Learning team. The final details of the required provision arising from each of the proposed housing sites will be set out within the Deposit Plan.
- **Flooding** – the Preferred Strategy seeks to avoid built development on areas that are identified within the flood plain. A Strategic Flood Consequences Assessment for the Vale forms part of the evidence base for the Preferred Strategy, and individual sites have submitted flooding and drainage strategies as part of their evidence base. The Sustainable Drainage (SuDs) approval body (SAB) requires new development to achieve approval for sustainable drainage before a 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.
- **Water Infrastructure** - DCWW have been consulted through the preparations of the Preferred Strategy and have provided information on existing mains water and sewage treatment capacity within the Vale of Glamorgan. DCWW have also provided representations in respect of Key Sites identified, advising where improvements will be required to support these sites.
- **Highway Congestion** - Stage 1 of the Strategic Transport Assessment was published alongside the Preferred Strategy and considered the baseline highway operation and sustainable transport position. A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan. This will include updated data, which will take into account post-pandemic travel patterns. This will also identify any mitigation that may be required to reduce the impact of the additional traffic from the sites. It must be acknowledged that the RLDP cannot itself rectify existing traffic congestion, but by allocating sites in sustainable locations that reduce the need to travel and where there are existing or proposed improvements, the potential for modal shift is greater.
- **Active Travel and Public Transport** – The key sites will be required to contribute towards the provision of sustainable transport through Section 106 agreements

and/or improvements to wider links. A number of concerns have been raised over the frequency, capacity and reliability of public transport. The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with TFW in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme. It is appreciated that trains travelling along the Vale of Glamorgan Line are currently at capacity during peak times. TFW have committed to introducing additional services at peak times and they will also be introducing new trains to the Line with increased capacity. It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.

### **Rolled Forward Sites**

- 3.20** Policy SP4 also includes 13 sites that have been rolled forward from the adopted LDP. As the principle of development has already been established on these sites, only a small number of comments were received. However, site SP4 L2 Land adjoining St Athan Road, Cowbridge, notably received 33 objections and 5 comments, with representors raising concerns about the access to the site and the fact that the current proposal, for which a planning application is awaiting determination, does not have the same boundary as the adopted LDP site and therefore there are concerns that this will not deliver the envisaged highway improvements. As the boundary for the site is different, representors feel that the site should not have been rolled forward and if assessed afresh, the site would have been viewed differently. As referenced, there is a planning application on the site and ultimately the outcome of this will need to be reflected in the Deposit Plan.

### **Key Employment Sites**

- 3.21** The Preferred Strategy identifies a hierarchy of strategic and local employment sites which include 4 key employment sites located at Bro Tathan (St Athan) Aerospace and Business Park, land east of Cardiff Airport Business Park and land south of Port Road (Model Farm) and Land to the South of Junction 34.

#### **SP13.2 Land south of Port Road (Model Farm), Rhoose**

- 3.22** A total of 29 representations have been made to the continued allocation of Model Farm for employment (25 objections, 1 support, 3 comments). Concerns raised include the loss of agricultural land, the previous identification of the site as a Green Wedge, the impact that the proposal would have on existing infrastructure, the increased risk of flooding and loss of biodiversity as well as the lack of demand for employment. The site has been included within the RLDP Preferred Strategy as it has been rolled forward from the adopted LDP, based on the recommendation of the Employment Land Study. The site is subject to an appeal for non-determination and ultimately the decision on this appeal may have a bearing on whether the site is

carried forward into the Deposit RLDP. However, given this is subject to an ongoing process, it is considered that this does not prejudice considering rolling forward the site in principle.

### **SP13.3 Bro Tathan East, Aerospace and Business Park**

**3.23** Objections made in respect of Bro Tathan East related to the lack of evidence for the need for the proposals and the number of jobs forecast and the lack of public transport to serve the development. A further representation was made which seeks to increase the boundary of the site to consider the availability of land within the ownership of the Welsh Government associated with the Enterprise Zone. As above, the Employment Land Study considers that the site will realistically deliver jobs over the plan period and should continue to be allocated for employment. The concern about public transport is noted. However, Bro Tathan will help to support the business case for a new station at St Athan, which was subject to a UK Government announcement in March 2024 that funding would be available for the development of a business case for the station. Further consideration will be given to the proposed expansion of the boundary for Bro Tathan as part of the evidence base for the Deposit Plan.

### **SP13.4 Land to the South of Junction 34, Hensol**

**3.24** Objections made in respect of Land to the South of Junction 34, Hensol sought to reduce the area of land allocated for development to reduce the loss of areas of nature conservation interest. However, the site reflects an existing planning permission, with ecological mitigation and protection being considered as part of this process.

### **Strategic Policies**

**3.25** The Preferred Strategy contains 19 Strategic Policies. The strategy and housing and employment allocation policies (SP1, SP2, SP3, SP4 and SP13) are discussed above. The other policies have received small numbers of representations of support, objections and comments, as detailed in the ICR. Objections in relation to the policies generally sought to amend the wording of policies and supporting text to provide further clarity. The ICR identifies that a number of these changes should be incorporated in the Deposit Plan.

### **Initial Integrated Sustainability Assessment (ISA) and Habitats Regulations Assessment (HRA)**

**3.26** A total of 7 representations were made in respect of the Initial ISA. Most notably, NRW concludes that they are generally satisfied that the Preferred Strategy has been appropriately appraised through the ISA methodology. Several site promoters challenged the scoring of their sites in respect of the ISA but these have been dealt with under the site specific representations.

- 3.27** One representation was received on the HRA by NRW. This identifies that the conservation objectives for the Severn Estuary are incorrect and require review and they recommend that the study be expanded to consider the impact on some other species and habitats. Changes suggested through the representations shall be incorporated within the HRA for the Deposit Plan.

### **Candidate Sites Register**

- 3.28** Representations were made in respect of 52 sites included within the Stage 2 Candidate Sites Register. These include representations of support and further information from site promoters, as well as objections to the sites. The number of representations received by site are included within the ICR. The ICR does not contain full responses on these representations, but the additional evidence submitted, and the objections made in respect of sites will be considered as part of the candidate site assessment process.

### **2<sup>nd</sup> Call for Candidate Sites**

- 3.29** A total of 38 sites were submitted as part of the 2nd Call for Candidate Sites. This consisted of 14 new sites, and 24 sites that were submitted previously, but were proposed for a different use (for example submitted as affordable housing led proposals) or had a boundary amendment. The Council will in due course publish a register of these sites, and consideration of the sites will be made in accordance with the Council's Candidate Site Assessment Methodology, and the result will be published alongside the Deposit Plan.
- 3.30** All of the representations received, from individuals, businesses, statutory consultees and all stakeholders, have been fully considered and responded to in detail in the Annexes attached to the Consultation Report. It is recognised that there have been a number of objections submitted to the proposed strategy, policies and sites, and this is not unexpected given that the strategy involves a number of large housing sites that will inevitably have external impacts to a degree. However, it is considered that these sites are located sustainably and in position which would minimise those impacts. The objections raised must be balanced and considered in the context of the identified housing need, and the requirement to deliver a level of growth that is consistent with the Vale's position in the National Growth Area set out in Future Wales. Consequently, and having considered all of the representations, it is recommended that the Preferred Strategy be approved as a basis for the ongoing preparation of the Deposit RLDP.

## **4 How do proposals evidence the Five Ways of Working and contribute to our Well-being Objectives?**

- 4.1 Long term** – The RLDP Preferred Strategy 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.



- 4.2 Prevention** – The RLDP will contain 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.
- 4.3 Integration** – The RLDP Preferred Strategy 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 numerous external organisations and agencies. Accordingly, it is recognised that they will all play an important role in the preparation of the RLDP. The RLDP will also be prepared in accordance with a range of national Planning Policy and guidance as well as environmental, social and economic evidence gathered as part of the Councils Integrated Sustainability Appraisal.
- 4.4 Collaboration** - The RLDP is subject to extensive statutory consultation in accordance with the LDP Regulations 2005 (as amended 2015) and the Development Plans Manual (Edition 3, 2020). 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. The RLDP must also consider the impact of the RLDP on neighbouring Local Authorities, the Council is involved in several regional working groups which will influence the evidence base and emerging policies.
- 4.5 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.

## **5 Climate Change and Nature Implications**

- 5.1** The RLDP provides the local planning policy framework for delivering sustainable development in the authority up to 2036. It has a key role to play in making new development resilient to climate change, decarbonising society, and protecting and enhancing the natural environment and strategic policies are set out within the Draft PS to respond to these issues.
- 5.2** Climate change and biodiversity are identified as ISA themes in the draft Scoping Report.
- 5.3** The ISA framework contains relevant ISA objectives for the RLDP in respect of climate change and biodiversity.

## **6 Resources and Legal Considerations**

### **Financial**

- 6.1** Revenue and reserve funding is available to progress the RLDP to adoption. It is anticipated that this will cover expenditure relating to all elements of preparation of the RLDP and the Independent Examination.

### **Employment**

- 6.2** There are no direct employment implications associated with this report.

### **Legal (Including Equalities)**

- 6.3** The RLDP will be subject to an ISA to assess the environmental, social and economic implications of the Plan's strategy and policies pursuant to Section 39(2) of the Planning and Compulsory Purchase Act 2004.
- 6.4** The adopted LDP remains the extant planning policy framework for the determination of planning applications and appeals in the Vale of Glamorgan while the RLDP is being prepared. Once the RLDP is adopted it will replace the current adopted LDP.

## **7 Background Papers**

None.



██████████  
Head of Sustainable Development  
Vale of Glamorgan Council  
Dock Offices  
Subway Road  
Barry  
CF63 4RT

13 February 2024

Dear ██████,

**Vale of Glamorgan Council – Replacement Local Development Plan (LDP) Preferred Strategy Consultation: Welsh Government Response**

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

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

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

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

## **Annex 1 – General Conformity with Future Wales**

- Regional Collaboration - **Further clarity required**

## **Annex 2 – Core matters that need to be addressed (PPW and the DPM)**

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

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

My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely,

[Redacted Signature]

[Redacted Name]  
**Chief Planner Welsh Government**

For matters relating to general conformity with Future Wales and planning policy please contact: [Redacted] / For matters relating to Local Development Plan procedures and compliance with the Development Plans Manual please contact: [Redacted] and [Redacted]

## Annex 1 - Statement of General Conformity

**The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Preferred Strategy 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).**

This conformity statement is based upon the evidence currently available. Welsh Government reserves its formal position until the full suite of policies, proposals and finalised evidence base is available to scrutinise at Deposit Stage. Currently, there is a joint position statement on the relationship between Cardiff and the Vale of Glamorgan (BP20), which considers population growth, migration patterns, housing completions, commuting and transport links between both authorities. Whilst the Welsh Government supports the principle of this work, further evidence is required to demonstrate how regional collaboration has influenced the scale of growth in the Vale of Glamorgan and the relationship to all adjoining authorities, including Bridgend and Rhondda Cynon Taff.

### 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 and make the best use of our 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 Local Development Plan (LDP) requires further evidence to clarify/demonstrate how the wider region, including the adjoining authorities of Bridgend and Rhondda Cynon Taff, has helped to influence and shape growth levels in the replacement plan.

**Annex 2** explains our comments in respect of the scale and location of growth. On balance, (and subject to the comments in Annex 2), the Welsh Government considers that the Preferred Strategy, including the scale and distribution of growth, 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

Policy 12 Regional Connectivity and Policy 36: South-East Metro

Policy 33: National Growth Area – Cardiff, Newport and the Valleys

**Regional Collaboration – Further clarity and justification:** The Welsh Government supports the joint position statement (BP20) on the relationship between Cardiff and the Vale of Glamorgan on matters including population and migration, housing growth, commuting patterns and transport. The paper concludes/supports a reduction in the housing requirement (from the currently adopted plan). The paper suggests that an up-take of housing delivery on the strategic sites in Cardiff will reduce the number of working age moving into the Vale for new build family housing with both authorities not in direct competition with each other for planned growth. Whilst the Welsh Government does

not object to the principle of this approach, **it is unclear how the wider region, particularly Bridgend and Rhondda Cynon Taff, has been involved in shaping and agreeing the choices made and the consequences of any decisions taken by the Vale for other plans in the region and future Strategic Development Plan (SDP).**

Moving forward to Deposit, further work will be required to understand how the Preferred Strategy has been developed within the wider regional context as **Future Wales brings a new perspective that all LDPs have to embrace on how each plan sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships in advance of the formal commencement of an SDP.**

## **Annex 2 – Core matters that need to be addressed (PPW and the DPM)**

### **Spatial Strategy - Location of Growth**

The Council has 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 Preferred Strategy. 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 most 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. It is noted that taking into account the existing land bank of 6060 dwellings, to meet the proposed housing requirement the authority needs to allocate around 2,600 units on new sites. As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (KS1-5) on well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the candidate sites assessment process to assess sites and their proximity to transport nodes. **The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.**

### **Spatial Strategy - Primary Settlements**

The Council's settlement hierarchy allocates circa 95% 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. However, as a result of the review process the settlements of Culverhouse Cross and Wick have been elevated (from that set out in the adopted plan) from Minor Rural Settlements to Primary Settlements. Both settlements are located outside the Strategic Growth Area and Policy SP2 is clear that in these settlements growth will be limited to the re-use of existing buildings, infill opportunities, small-scale affordable housing, and rural enterprises only. On this basis, **the rationale for identifying Culverhouse Cross and Wick as Primary Settlements is unclear**, especially as these settlements will perform the same function as the lower tier Minor Rural Settlements as set out in Policy SP2. The plan (6.47) makes clear that the Council will not support

growth in Culverhouse Cross and Wick due to their rural location as any growth here would encourage car borne trips, which is contrary to the Preferred Strategy and exasperated by a lack of Key Services (BP5) in the settlements, particularly in Culverhouse Cross. **The Council will need to evidence and justify the position of Culverhouse Cross and Wick as Primary Settlements in the hierarchy to ensure there will be no potential unintended outcomes in the implementation of the plan following adoption.**

### **The Level of Growth - Homes and Jobs**

The Preferred Strategy (Policy SP3) makes provision for 8,679 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 2,000 homes will be affordable. The flexibility allowance proposed by the Council is 10%. The delivery of new jobs is for up to 5,388 new posts over the plan period.

**Homes:** The 2018 WG Principal projections are the latest projections for this Preferred Strategy. **Any future population and household projections based on the latest 2021 Census will need to be considered by the Council if they are published before the plan is examined.** The 2018 principal projection would result in a requirement of 430 units p/a or 6,463 units over the plan period (using a 4% vacancy rate). The level of housing growth proposed in the plan is around +2,215 units above the WG 2018 principal projection. The Council considers that this lower level of growth 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.

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 migration of 1,009 persons. The Council considers that 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 the City'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. Whilst the Welsh Government supports the joint position statement between the Vale of Glamorgan and Cardiff Council (BP20) **it is our view that further work is essential in respect of regional collaboration to demonstrate this conclusion**, particular the relationship between the Vale of Glamorgan and neighbouring LPAs (see Annex 1).

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 780 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 would not comply with FW/PPW in terms of sustainable development and transport. 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 moving forward to Deposit stage** as required by Planning Policy Wales, Future Wales, and the Development Plan Manual.

**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 Study (BP12) and as set out in Policy SP13. The Welsh Government notes that the level of employment growth could be higher (up to 13,978 jobs) if the total realistic land supply (177ha) was built out. However, this is a measure of job capacity the land could support and is not a forecast of new jobs with many of the strategic sites not anticipated to be completed until after the plan period post 2036.

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 take into account low housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). On this basis, **the Welsh Government has no significant concerns on the level of job growth proposed in the plan.**

**In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.**

### **Affordable Housing Provision**

**The 'emerging' LHMA** - The Summary Note of the draft Local Housing Market Assessment (LHMA) (BP10A) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The calculation of affordable housing need projected against a 10-year dwelling-led scenario results in a requirement for 7,643 affordable homes over the plan period (510 p/a) with a tenure split of 67% social rent and 33% intermediate. The figures are lower for the policy neutral scenario (totalling an affordable housing need of 7,011 units) when calculated using the latest Welsh Government 2018 principal projections.

The plan (Policy SP8) identifies a target of delivering a minimum of 2,000 affordable homes, which will be revised and updated at Deposit stage. In both models, the housing need is across all 13 Housing Market Areas and is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (54%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.

On this basis, the Welsh Government has no significant concerns regarding the relationship between the emerging LHMA and the Preferred Strategy, however, **as the LHMA is not yet finalised, the WG reserves its position this matter until the final report is published by Deposit stage.**

**Affordable Housing Led Sites** - To deliver additional affordable housing above which market led housing can provide, the authority proposes (in Policy SP2) 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.** 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. At present the plan and supporting evidence is unclear and sometimes contradictory as to whether these sites will be located within or on the edge of settlement boundaries. In addition, the scale and location of these sites is unclear (the Plan, Table



3, Row F) where no spatial locations or dwelling numbers are attributed to them. How does such an approach comply with the transport oriented spatial strategy?

Affordable housing led sites that have a market element to them must be located within a settlement boundary in order to comply with the requirements in TAN 2. Only 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN and any threshold/policy requirements set in the development plan. **The approach to affordable housing led developments, their scale and location requires clarification and ensure compliance with national policy.**

### **Employment Land**

The Council's Employment Land Study (BP12) 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 SP13 identifies employment land allocations totalling 168ha, which is an increase of around +100ha 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 and total 139ha (83%) of total provision. On this basis, **the Welsh Government does not object to the over-provision of employment land in the plan** as the Enterprise Zone designation must be identified and the allocations within it (SP13: 1-3) are all subject to developer interest for specialist employment uses.

### **Delivery and Implementation**

In line with key requirements in Planning Policy Wales, the Development Plans Manual (Chapter 5) also contains 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 that the Preferred Strategy has included emerging master planning/infrastructure work on key sites, and this is considered to be a good start to be built upon moving forward to Deposit.

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. We note that two of the Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units are dependent upon 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 Council, in conjunction with Transport for Wales, will need to robustly evidence the delivery of the sites and include feasibility work and the funding required to secure the new station in the early phases of developing the key sites. 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 available at Deposit stage. The Council will also need to demonstrate that these Key Sites and all other housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.

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

### **Gypsy and Travellers**

The final draft of the Gypsy and Traveller Accommodation Assessment (June 2022) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026.

By Deposit stage, the authority must meet its statutory duty and comply with requirements in Planning Policy Wales (4.2.35), Circular 005/2018 (paragraph 35) and the Development Plans Manual (5.80-5.85) to allocate sufficient and deliverable sites in the plan for unmet gypsy and traveller need.

By Deposit stage, the Council will also need to ensure that any sites are supported by a transparent and robust site selection process that aligns with the requirements of Circular 005/2018 and any relevant guidance. The views of the relevant statutory bodies must also be agreed before Deposit stage with no outstanding objections to the delivery of the sites.

## **Renewable Energy**

Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Opportunities for district heating outside of Barry is considered in the study to be relatively limited.

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.

The Deposit plan may identify solar and wind areas (where appropriate) above 10MW. In this instance, the plan will need to be clear that large-scale energy developments (>10MW) are classed as Developments of National Significance (DNS) and will be considered by Ministers in accordance with the policies in Future Wales. The plan should also include a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW.

## **Minerals**

The Regional Technical Statement (RTS 2<sup>nd</sup> 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. However, by Deposit stage, the plan should be supported by a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region to explain how any shortfall will be met across the region, particularly for crushed rock, of which the Vale has a surplus.

## **Agricultural Land**

The Welsh Government has no objection to the Preferred Strategy in respect of Best and Most Versatile (BMV) agricultural land. However, the following areas of clarification and issues should be considered during the preparation of the Deposit plan:

**Candidate Site Assessment Methodology:** The methodology is clear on the application of BMV policy, evidence base (predictive map) and current guidance. In the methodology, BMV agricultural land is considered under state 2. Site promoters are encouraged to use the Predictive map and, in line with guidance, commission surveys if BMV is a matter for consideration.

The Land, Nature and Forestry Division disagrees with the 'traffic light' assessment noted in section 8.3.6 where Subgrade 3a agricultural land is noted as 'amber'; 3a should also be in 'Red'. PPW paragraph 3.58 is clear, '*Agricultural land of grades 1, 2 **and 3a** [emphasis added] of the Agricultural Land Classification system (ALC) is the best and most versatile and should be conserved as a finite resource for the future*'.

**Renewable Energy Assessment:** It is welcome that the Renewable Energy Assessment 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 1<sup>st</sup> March 2022 in respect of solar PV and BMV agricultural land for completeness.

**Topic paper – BMV Agricultural Land:** The authority has produced a specific topic paper on BMV policy application. This is very welcome and has made the assessment of the preferred strategy much clearer. The paper only covers the application of BMV policy in the candidate site assessment process of the LDP. It would benefit the paper to provide some initial introductory commentary on the application of BMV policy in the spatial strategy, evidence base and ISA for completeness. This would demonstrate how the policy has been applied to the entire LDP development. Matters that require further work/clarification are as follows:

- Two of the Key Sites have been identified as containing BMV agricultural land, and ALC surveys have been commissioned to confirm the grading. The Department would be available to validate any ALC surveys undertaken by the authority or site promoters.
- It is noted that a number of existing LDP allocations are being 'rolled forward' as detailed in the plan (Appendix 1). These sites should be reassessed against the Predictive ALC map (2019) and existing surveys, as the desk-based assessment undertaken at the time (2015) pre-dates the introduction of the Predictive ALC map and current guidance on survey requirements.
- WG disagrees with section 5.5 of the topic paper, regarding the 20ha threshold to consult with Welsh Government (TAN6, Annex B2). This would only be the case in respect of Departure cases. For LDP's, TAN6 Annex B1 notes the consultation arrangements for authorities with the Landscape, Nature and Forestry Division.

### **Welsh Language**

The ISA notes that issues relating to the Welsh language is currently not included and states that this will be further explored and addressed in the Deposit plan. **Not including sufficient evidence on the impact of the Preferred Strategy on the Welsh language is a concern.** Assessing the impacts on issues such as the Welsh language, should be fully aligned with the development of the plan early in the process and not at Deposit stage. There are no clear commitments on how the plan will sustain or support the further increase in the number of Welsh speakers within the local planning authority area in line with the Government's aspirations of supporting the increase in the number of Welsh-speakers and the use of the language. It would be of benefit if the Deposit plan could outline and consider the following policy and acts as well as local strategies:

- Welsh Language Measure (2011): especially in line with the authority's Welsh language standards of creating new policies
- Cymraeg 2050: A million Welsh-speakers

We would advise the authority to make contact with the local Welsh Language Initiative ([Menter Iaith y Fro](#)) for further help and support.

VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN  
2021 - 2036

# INITIAL CONSULTATION REPORT



MAY 2024



## 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 extended the 6-week statutory Pre-Deposit (Preferred Strategy) consultation period, as required by regulation 16, and held a 10-week consultation to account for the Christmas and New Year period. The Preferred Strategy statutory consultation period took place between Wednesday 6<sup>th</sup>

December 2023 and Wednesday 14<sup>th</sup> February 2024, in accordance with the timescales outlined in the Community Involvement Scheme (CIS), which forms part of the Delivery Agreement.

- 1.5 This Initial Consultation Report has been prepared to outline how the Vale of Glamorgan Council has undertaken public participation and consultation on the Preferred Strategy, 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, how the representations received have or will be addressed and how this key period of consultation will influence development of the Deposit RLDP.

## **2. Consultation Methods**

- 2.1 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 at Preferred Strategy stage to encourage engagement and participation with the widest audience possible in accordance with the CIS, which forms part of the Delivery Agreement.
- 2.2 Engagement on the Preferred Strategy 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.
- 2.3 The key methods of engagement were set out below:

### Local Advertisement

- 2.4 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.
- 2.5 There is no longer a statutory requirement for the formal notice to be published in local newspapers. However, the Local Democracy Reporter for the Vale of Glamorgan wrote an article about the Preferred Strategy that was published on Wales Online, which has an estimated reach of around 3 million readers, on the 5<sup>th</sup> of November 2023.



**Figure 1: Article on Wales Online**

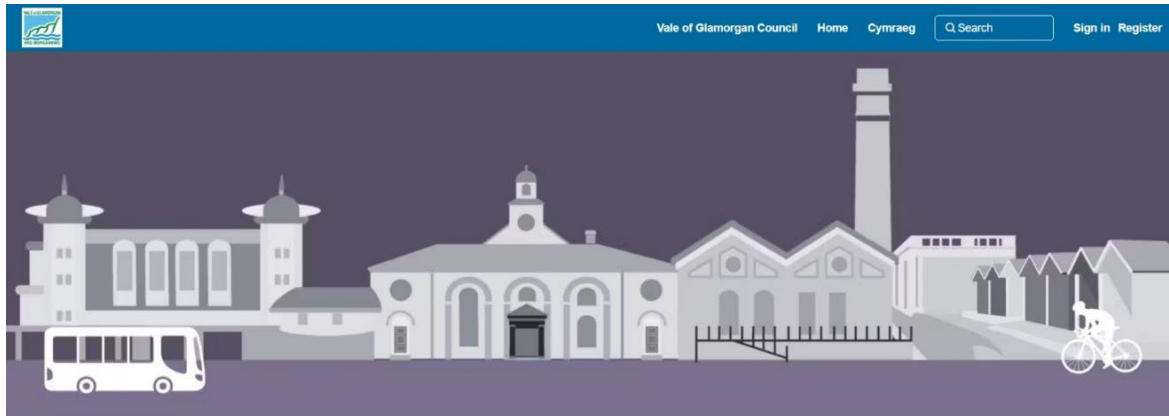
### Council Website and Public Inspection

- 2.6 A dedicated consultation page, including the package of consultation documents, was published on the Vale of Glamorgan Council's consultation website, Participate Vale, with links from the main Planning pages of the Council's website. Throughout the consultation period there were over 2,000 visits to this page. An email was sent to 4,970 residents, who have subscribed via Participate Vale to be kept informed of any consultations, advising them of the consultation start date on Wednesday 6<sup>th</sup> December 2023 as well as a follow-up email on the 18<sup>th</sup> January 2024. 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.
- 2.7 An animation and series of infographics were produced to present the strategy in a simple and engaging way for residents.
- 2.8 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 Preferred Strategy as well as how to view the documents, how to make comments and what will happen after the end of the Preferred Strategy consultation.

- 2.9 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](mailto: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 Docks Office, if preferred or for accessibility reasons.





Home / Consultation on the Preferred Strategy for the Replacement Local Development Plan (RLDP) 2021-2036

## Consultation on the Preferred Strategy for the Replacement Local Development Plan (RLDP) 2021-2036

[Gweld y tudalen hon yn Gymraeg / View this page in Welsh](#)

Consultation on the Preferred Strategy for the Vale of Glamorgan Council's Replacement Local Development Plan (RLDP), along with the Initial Integrated Sustainability Appraisal and Habitats Regulations Assessment has now ended.

The consultation was live for 10 weeks, from Wednesday 6 December 2023 to Wednesday 14 February 2024.

The RLDP will help shape the Vale of Glamorgan for the next 15 years (from 2021 to 2036). It will help us to decide what developments will and will not be permitted at different locations and highlight areas that we need to protect.

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 it does not include all of the detailed policies, land use proposals or infrastructure required to support development.

The Preferred Strategy sets out:

- A Vision for the Vale of Glamorgan by 2036
- Strategic Objectives
- A Sustainable Growth Strategy
- Regeneration Opportunities
- The identification of Key Housing and Employment Sites
- Strategic Policies to deliver the strategy

The consultation documents can be found on the consultation portal: [Vale of Glamorgan Council / Cyngor Bro Morgannwg - Consultations \(oc2.uk\)](#).

The Council hosted a series of online and in person engagement sessions at which information on the Preferred Strategy and how to make comments was made available. The dates, times and locations of these events is set out below:

### Online Information Sessions

Online information sessions were held on the following dates and times.

- Thursday 14th December 2023 - 18:00-19:30 (Penarth, Dinas Powys, Llandough and Sully)
- Monday 18th December 2023 - 18:00-19:30 (Western Vale, Peterston-Super-Ely, St Nicholas and Llancarfan)

### In-Person Information Sessions

- Barry @Victoria Park Community Centre, CF63 1JY - Tuesday 9th January 2024 - 14:00-18:00
- Rhosee @Rhoose Community Centre, CF63 3EZ - Thursday 11th January 2024 - 14:30-18:30
- Cowbridge @Cowbridge Town Hall, CF71 7AD - Friday 12th January 2024 - 14:30-18:30
- Dinas Powys @Murchfield Community Centre, CF64 4QQ - Monday 15th January 2024 - 14:00-18:00
- St Athan @Paul Lewis St Athan Community Centre, CF62 4PP - Tuesday 16th January 2024 - 14:30-18:30
- Llantwit Major @CF61 Centre, CF61 1ST - Thursday 18th January 2024 - 15:30-18:30
- Penarth @St Paul's Community Centre, CF64 1EU - Friday 19th January 2024 - 14:30-18:30

### Key Dates

Consultation opens  
06 December 2023

Consultation closes  
14 February 2024

### Vale of Glamorgan Replacement Local Development Plan (LDP) Video



### Contact us

#### Local Development Plan Team

Planning Policy, Vale of Glamorgan Council, Dock Office, Subway Road, Barry, Vale of Glamorgan, CF63 4RT.

Email [ldp@valeofglamorgan.gov.uk](mailto:ldp@valeofglamorgan.gov.uk)



### 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?

**Figure 2: Preferred Strategy Consultation Page, Participate Vale**

2.10 Bilingual printed copies of the Preferred Strategy, representation forms and any relevant 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 Preferred Strategy 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 Docks Office or scanned and emailed to [LDP@valeofglamorgan.gov.uk](mailto:LDP@valeofglamorgan.gov.uk).

## Social Media

2.11 The consultation was promoted through the Council's social media channels such as Facebook, X (formerly Twitter), and LinkedIn. The Facebook post on 12 December 2023 reached 2,127 people. A Facebook post on the 30<sup>th</sup> of January 2024 reached 2,130 people and had 87 engagements. Engagements can mean viewing an image, clicking on a link, expanding the text to 'read more', sharing the post or commenting on it.

2.12 It was posted on X (Twitter) five times over the consultation period, with each post finally receiving over 800 views. An example is shown in Figure 3. 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 3: X post**

## LDP Consultation Database

2.13 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 Pre-Deposit (Preferred Strategy) Consultation. In total, 867 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.

2.14 A detailed list of the bodies engaged during the Preferred Strategy Consultation is provided in the Delivery Agreement (Revised November 2023) and in Annex 9 of this document. As the consultation progressed, additional representors were added to the database upon request. Stakeholder sharing

## Stakeholder dissemination

2.15 The consultation was shared with the Council's Public Participation Network, which comprises Vale of Glamorgan officers involved in engagement across a

range of service areas, and also with the Council's Placemaking Group, which comprises officers involved in placemaking.

- 2.16 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.

### Public Engagement Sessions

- 2.17 Public Information drop-in sessions were hosted during the consultation period to provide residents the opportunity to discuss the scope of the Preferred Strategy, 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 Preferred Strategy, supporting documentation, all representation forms were made available at each session as well as bilingual exhibition boards that documented key elements of the Preferred Strategy and all the proposed Key Sites identified in the plan. The 7 drop-in sessions were all held in January to account for the Christmas and New Year period, in accordance with the advertised timetable as follows:

- Barry at Victoria Park Community Centre  
Tuesday 9<sup>th</sup> of January 2024 - 2pm-6pm (2 attendees)
- Rhoose at Rhoose Community Centre  
Thursday 11<sup>th</sup> of January 2024 – 2:30pm-6:30pm (55 attendees)
- Cowbridge at Cowbridge Town Hall  
Friday 12<sup>th</sup> of January 2024 – 2:30pm-6:30pm (41 attendees)
- Dinas Powys at Murchfield Community Centre  
Monday 15<sup>th</sup> of January 2024 – 2pm-6pm (125 attendees)
- St Athan at Paul Lewis St Athan Community Centre  
Tuesday 16<sup>th</sup> of January 2024 – 2:30pm-6:30pm (71 attendees)
- Llantwit Major at CF61 Centre  
Thursday 18<sup>th</sup> of January 2024 – 3:30-6:30pm (7 attendees)
- Penarth at St Paul's Community Centre  
Friday 19<sup>th</sup> of January 2024 – 2:30pm-6:30pm (32 attendees)

- 2.18 Online briefing sessions were organised and held in December, at the start of the consultation period. However, take up of these was limited, and this resulted in the cancellation of the first session on Monday 11<sup>th</sup> of December 2023 (and those that did sign up were subsequently invited to attend one of the remaining two sessions on Thursday 14<sup>th</sup> of December 2023 or Monday 18<sup>th</sup> of December 2023).



**Figure 4: Public Information Drop-in Session at Murchfield Community Centre, January 2024**

#### Planning policy duty line and LDP mailbox

- 2.19 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 and Elected Member Workshops

- 2.20 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 in advance of the Pre-Deposit Consultation. Whilst Elected Members were invited directly, PSB members and Town and Community Council Clerks were welcomed to either attend themselves or send a representative on behalf of their organisation.
- 2.21 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 as well as the Growth and Spatial Options:

## Vision, Issues and Objectives

<b>Workshop</b>	<b>Date</b>	<b>Attendees</b>
Elected members	05/09/22	33
Vale of Glamorgan Public Services Board	14/10/22	6
Community Councils	21/10/22	4
Town Councils	15/12/22	4

## Growth and Spatial Options

<b>Workshop</b>	<b>Date</b>	<b>Attendees</b>
Elected Members – Growth Options	01/12/22	18
Elected Members – Spatial Options	16/01/23	25
Town & Community Councils	08/02/23	12
Council Officers	14/02/23	14
Vale of Glamorgan Public Services Board	15/02/23	9

## Preferred Strategy

<b>Workshop</b>	<b>Date</b>	<b>Attendees</b>
Rapid Participatory Health Impact Assessment	27/06/2023	22
Vale of Glamorgan Public Services Board	14/07/2023	27
Equalities Consultative Forum	27/07/2023	16

- 2.22 Further details on these engagement sessions can be found in [BP1 Engagement Report](#), where both elected members and Town and Community Councils expressed a clear preference for Option 4 – Sustainable Transport Oriented Growth as the basis for the Preferred Strategy and for a Medium level of housing and employment growth.
- 2.23 Following on from these pre-consultation engagement sessions, additional sessions were held in advance of the Preferred Strategy consultation start date to provide awareness of the implications of the Preferred Strategy and its content, as well as provide details on the consultation process and associated engagement. The sessions held are identified in the table below:

<b>Session</b>	<b>Date</b>	<b>Invitees</b>	<b>Attendees</b>
Elected Members – Barry & Wenvoe	17/10/23	21	9
Elected Members – Penarth, Dinas Powys & Llandough	18/10/23	16	8
Elected Members – Western Vale, Peterston-Super-Ely and St Nicholas and Llancarfan	23/10/23	17	13
Town & Community Councils	29/11/23	All T&CCs	28
Equalities Consultative Forum	07/12/23	All ECF members	18

2.24 During the consultation period, members of the Council's Planning Policy team attended the 50+ Forum on the 24<sup>th</sup> of January 2024 to provide awareness of the Preferred Strategy and its content in relation to the Age Friendly Vale Charter as well as provide details on the consultation process. 6 members of the 50+ Forum executive committee attended and engaged in meaningful discussion and highlighted relevant points for the Council to consider as the plan progresses.

Accordance with the Delivery Agreement (Revised November 2023)

2.25 The table below identifies the methods of engagement for Consultation on the Preferred Strategy, Initial ISA Report/ HRA that the Council committed to in Appendix 2 of the Delivery Agreement (DA) (Revised November 2023) and confirmation if these were done.

<b>Methods of Engagement – Delivery Agreement</b>	<b>Status</b>
Website notification via email/letter	Complete
Social media	Complete
Posters	Complete
Exhibitions/drop-in sessions	Complete
Virtual engagement	Complete

2.26 To advertise the consultation, in accordance with the DA, an RLDP Consultation poster was produced as well as a high-level introduction video. 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. The introduction video, enhanced with engaging graphics, provided general background information on the RLDP process and Preferred Strategy stage but most importantly highlighted the key elements and basis of the Vale's Preferred Strategy, how to view the full package of consultation documents, and how the public could have their say.

2.27 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.

### **3. Responses to the Public Consultation**

- 3.1 A total of 857 individuals made representations on the RLDP Preferred Strategy and its supporting documents. 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:
- Preferred Strategy – 2,853 duly made representations, comprising 225 representations of support, 425 comments and 2,203 objections.
  - Candidate Sites Register – 312 duly made representations, comprising 72 representations of support, 25 comments and 215 objections.
  - Initial Integrated Sustainability Appraisal – 7 duly made representations.
  - Habitats Regulations Assessment of the Preferred Strategy – 1 duly made representation .
  - Other Supporting documents – 15 duly made representations.
- 3.2 A total of 178 representations that were submitted using the OpusConsult web were rejected as they were duplicate comments. This includes one representor who submitted the same comment 73 times and another who submitted the same comment 30 times. Two representations were not accepted as they were received after the deadline and a further postal representation was rejected as the representor had included no contact details.
- 3.3 One representation was withdrawn at the request of the representor.
- 3.4 One e-petition was received in respect of SP4 KS1 North East Barry and SP4 KS2 Land to the North of Dinas Powys. This petition received 244 signatures. 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.
- 3.5 A total of 38 sites was submitted as part of the 2nd Call for Candidate Sites. This consisted of 14 new sites, and 24 sites that were submitted previously, but were proposed for a different use (for example submitted as affordable housing led proposals) or had a boundary amendment. The Council will in due course publish a register of these sites, and consideration of the sites will be made in accordance with the Council's Candidate Site Assessment Methodology, and the result will be published alongside the Deposit Plan.
- 3.6 In total, 43.9% of representations were submitted using the online consultation portal, 45.6% were submitted by email (including completed response forms that were emailed to the Council) and 10.5% were submitted on paper.



## 4. Key Issues Raised

### Statutory consultees

- 4.1 Comments were made on the Preferred Strategy by statutory consultees, including the Welsh Government. The WG comments were split into two sections, the first in respect of the general conformity of the Preferred Strategy to National and Regional Planning Policy and Context, and the second in respect of Core Matters that need to be addressed by the Council prior to publication of the Deposit RLDP.
- 4.2 In regard to general conformity of the plan, no objection was raised by the Welsh Government to the Preferred Strategy and the Welsh Government is of the opinion that the Preferred Strategy is in general conformity with the National Development Framework: Future Wales.
- 4.3 While the Welsh Government also supported the Council's joint statement with Cardiff Council that considers the relationship between Cardiff and the Vale from a population, housing, commuting and transport perspective, the Welsh Government wished to see further wider regional collaboration be undertaken to demonstrate how regional collaboration has influenced the scale of growth in the Vale of Glamorgan and the relationship to all adjoining authorities, including Bridgend and Rhondda Cynon Taff.
- 4.4 In relation to the Core Matters, the Welsh Government considers that the Spatial Strategy, the distribution and level of housing and employment growth proposed by the Council is in general conformity with Future Wales, and as such no objections were raised in respect of these elements of the Preferred Strategy.
- 4.5 The Welsh Government also raised a number of points of clarification which the Council will address at the Deposit Plan Stage. These relate to the RLDP Settlement Hierarchy, delivery and implementation of Key Sites, Gypsy and Traveller Site Provision, Renewable Energy, Minerals, the consideration of the Best and Most Versatile Agricultural Land in the assessment of Candidate Sites, and the provision of additional information in respect of the potential impact of the RLDP on the Welsh Language. The Welsh Government comments and the Council's response to them is included in Annex 1 of this report.
- 4.6 Natural Resources Wales (NRW) also submitted comments to the Preferred Strategy during the consultation period. The representations received suggested a number of amendments to the vision, strategic objectives, and

strategic policies of the Preferred Strategy which the Council shall incorporate where appropriate into the Deposit RLDP.

- 4.7 NRW also submitted site specific representations in respect of the two of the Key Sites identified within the Preferred Strategy, namely, SP4 KS1 North East Barry and SP4 KS2 North of Dinas Powys, although comments on other sites had been received as part of engagement prior to the consultation. NRW raise concerns about the scale of the development at North East Barry and the proximity to the Barry Woodlands SSSI. NRW also raised concerns that the development would create risks from unauthorised and unmanaged public access, which had been experienced elsewhere in the Barry Woodlands SSSI at Pencoedtre West. NRW consider that there is scope to reduce the developed area of the site and enable a sustainable design that reduces the potential for impacts upon the SSSI, whilst also maintaining, enhancing and managing the important retained and created habitats on site. Advice has also been provided on avoiding built development in the southern part of the site, which is located within the flood plain, and suggested the further masterplanning is informed by ecological surveys. In this regard the Council has relayed these concerns to the promoters of sites, and it is intended that site layouts will be amended to reflect the comments of NRW. This will include appropriate buffers for SSSI woodlands and maximising opportunities for biodiversity net benefit to increase connectivity between the currently fragmented woodland parcels. No built development has been identified in the flood risk area in the south of the site.
- 4.8 In respect of SP4 KS2 North of Dinas Powys, it is reiterated that masterplanning will be important in ensuring constraints for ecological surveys are carefully considered and that the masterplan would need to include appropriate mitigation and compensation.
- 4.9 Dwr Cymru Welsh Water (DCWW) have provided general comments on the existing water infrastructure capacity associated with the Key Sites within the Preferred Strategy and have identified where additional investment would be required to support planned growth. DCWW have requested that Hydraulic Modelling Assessments are undertaken on the key sites, however, they have advised that this work would be expected prior to a planning application, not at the development plan stage. DCWW have advised that the Cog Moors Wastewater Treatment Works (WwTW) has capacity to accommodate domestic foul flows in the Eastern Vale but that capacity for the sites in the Western Vale that are within the catchment area of West Aberthaw WwTW is limited. Improvements to capacity will be required over the plan period. Further infrastructure investment will be taking place as part of DCWW's asset management plan (AMP) programme.

### Other Key Issues Raised through the Consultation

- 4.10 In addition to representations from statutory consultees, representations were received from a range of stakeholders, 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 Preferred Strategy.
- 4.11 Most of the representations received objected to housing and employment allocations identified within the Preferred Strategy or sought the inclusion of sites previously discounted through the Candidate Site Assessment Process.
- 4.12 Many representations sought amendments to the wording of a variety of elements of the Preferred Strategy including strategic objectives, policies and/or supporting text. Comments were also made in respect of supporting documents.

### Vision, Themes and Strategic Objectives

- 4.13 Representations were received in respect of the Vision (58 responses), Themes (56 responses) and Strategic Objectives (484 responses). Representations made in support of the RLDP Vision and Objectives commented that it was aspirational and ambitious, promoted economic growth and sought to address the challenges of climate change. Conversely, objections submitted challenged the ability of the Council to deliver the RLDP Vision on the grounds that it was overly ambitious, or that the Vision should be shortened.
- 4.14 Objectors also suggested that the proposed housing and employment allocations and the spatial distribution of housing proposed within the strategy ran contrary to the delivery of the RLDP Vision and Objectives, e.g. that the proposed level of growth and identification of greenfield sites would have a detrimental impact on climate change and protecting and enhancing the natural environment. Conversely, others argued that insufficient levels of housing in rural areas would not meet the aspirations for the Rural Vale as set out in the Vision. The response to these representations is set out in Annex 5.

### Spatial Strategy

- 4.15 In developing the RLDP Preferred Strategy the Council considered the following 4 spatial strategy options, with Option 4 being the preferred option.
- Option 1 – Continuation of the adopted LDP Growth Strategy.
  - Option 2 – Dispersed Growth.
  - Option 3 – Focused Growth.

- Option 4 – Sustainable Transport Oriented Growth.
- 4.16 A total of 65 representations were received in respect of the spatial strategy options (23 in support of the preferred option, 37 objections and 5 comments). Representations made in support of the Preferred Strategy thought transport orientated growth was correct and supported national and regional policy, that it responded to affordable housing need identified, and that placemaking would enable connected communities.
- 4.17 Objections to the Spatial Strategy suggested that there is an over reliance on a small number of larger settlements to deliver housing growth, placing pressure on existing infrastructure, and that there are limited opportunities for sustainable transport. Representations also considered that the Spatial Strategy ignored opportunities for growth in rural settlements where the current adopted LDP has successfully delivered housing and that a proportion of growth should be directed to the rural Vale.
- 4.18 Accordingly, representors considered that the Council should base the strategy on one of the other spatial strategy options. Support for these were:
- Spatial Options 1- Continuation of the adopted LDP Growth Strategy – 0 Representations in support.
  - Spatial Option 2 – Dispersed Growth - 12 Representations in support
  - Spatial Option 3 – Focussed Growth - 1 Representations in support.
- 4.19 The response to these representations is included in Annex 2.

Housing and Employment Growth

- 4.20 In preparing the RLDP, the Council considered a range of population growth scenarios to assist in the identification of the level of housing and employment growth that will be provided over the plan period. The RLDP Preferred Strategy proposes the provision of 8,679 dwellings over the plan period and is based upon the average annual build rate of 526 dwellings achieved during the first 10 years of the current adopted plan (7,890 dwellings) plus a further 10% flexibility allowance (789 dwellings). In terms of employment provision, the RLDP requires 67.80 ha of land with the capacity to support 5,338 jobs over the plan period, and closely aligns to the projected increase in working age population associated with the proposed level of housing over the plan period.
- 4.21 A total of 88 representations were received in respect of the proposed level of housing growth - 20 in support, 55 objections and 13 comments. Representations objecting to the proposed level of housing included those that considered that the housing requirement was too high, that housing should be prioritised to local residents and not encourage inward migration,

that empty homes should be brought into occupation first and that the growth would have a negative impact on existing infrastructure and would conflict with climate change mitigation and therefore should be reduced. Others felt that a higher level of housing would be appropriate as it would deliver more affordable housing and that the Council should be more ambitious regarding growth due to its position in a Future Wales national growth area.

- 4.22 Representations were also received on Policy SP3 Housing Requirement and the housing land supply calculation. A number of objectors considered that the 10% flexibility allowance should be increased to 15-20% and that assumptions for non-delivery for rolled forward LDP sites and units with planning permission should be factored in.
- 4.23 In respect of the proposed employment growth contained within the Preferred Strategy, a total of 13 specific representations were received of which 1 was in support, 6 Objections and 6 comments. Representations objecting to the employment land provision consider it to be too high and that there is a lack of evidence for demand. There was also concern that there are existing vacant employment premises within the Vale of Glamorgan that should be prioritised first. The response to these representations is included in Annex 2.

#### Settlement Hierarchy and Strategic Growth Area

- 4.24 The Preferred Strategy identifies a settlement hierarchy in Policy SP2 comprising a key settlement (Barry), three service centre settlements (Cowbridge, Llantwit Major and Penarth), primary settlements (Rhoose, St Athan, Sully, Llandough, Dinas Powys, Wenvoe, Wick and Culverhouse Cross) and a fourth tier of minor rural settlements. Representations have been made that some settlements should be elevated or demoted in the settlement hierarchy based on their role.
- 4.25 A total of 30 representations were received on the Strategic Growth Area (3 support, 21 object and 6 comments). The concerns raised were that the primary settlements of Wick, Culverhouse Cross and Wenvoe should be included within the strategic growth area due to good bus routes and that the Minor Rural Settlements should accommodate more housing.
- 4.26 Representations were also received that St Athan should not be in the Strategic Growth Area as it does not have a station. The response to these representations is included in Annex 2.

#### Key Housing Sites

- 4.27 The Preferred Strategy proposes the following 5 key sites that will assist in the delivery of the identified housing requirement. The key sites, together with the number of representations received on them, are listed in the table

	<b>Respondents</b>	<b>Representations</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>
SP4 KS1 North East Barry	394	480	0	462	18
SP4 KS2 Land North of Dinas Powys	476	556	1	540	15
SP4 KS3 Land at Readers Way, Rhose	60	97	0	88	9
SP4 KS4 Land at Church Farm, St Athan	51	151	2	134	15
SP4 KS5 Land to the west of St Athan	51	146	1	126	19

- 4.28 One e-petition was received in respect of key site SP4 KS1 North East Barry and SP4 KS2 Land to the North of Dinas Powys. This petition received 244 signatures. In accordance with the approach to handling representations in the DA, 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.
- 4.29 The issues raised by objectors to the Key sites were primarily in respect of the potential negative impact of new development on the existing transport network (especially congestion), natural environment, air quality, flooding, loss of agricultural land, built environment, heritage and impacts on the character of existing settlements and loss of community identity.
- 4.30 Objectors also cited the increased demand that new development would have on local facilities such as health services, schools and supporting infrastructure and in particular roads and public transport. The full consideration of the range of issues identified is within Annex 3.

#### Rolled Forward Sites

- 4.31 Policy SP4 also includes 13 sites that have been rolled forward from the adopted LDP. As the principle of development has already been established on these sites, only a small number of comments were received. However, site SP4 L2 Land adjoining St Athan Road, Cowbridge, notably received 33 objections and 5 comments, with representors raising concerns about the access to the site and the fact that the current proposal, for which a planning application is awaiting determination, does not have the same boundary as the adopted LDP site and therefore there are concerns that this will not deliver the envisaged highway improvements. As the boundary for the site is different, representors feel that the site should not have been rolled forward and if assessed afresh, the site would have been viewed differently. Responses to the Rolled Forward site representations are also in Annex 3.

### Key Employment Sites

- 4.32 The Preferred Strategy identifies a hierarchy of strategic and local employment sites which include 4 key employment sites located at Bro Tathan (St Athan) Aerospace and Business Park, land east of Cardiff Airport Business Park and land south of Port Road (Model Farm) and Land to the South of Junction 34.
- 4.33 A total of 29 representations have been made to the continued allocation of Model Farm for employment (25 objections, 1 support, 3 comments). Concerns raised include the loss of agricultural land, the previous identification of the site as a Green Wedge, the impact that the proposal would have on existing infrastructure, the increased risk of flooding and loss of biodiversity as well as the lack of demand for employment.
- 4.34 Objections made in respect of Bro Tathan East related to the lack of evidence for the need for the proposals and the number of jobs forecast and the lack of public transport to serve the development. A further representation was made which seeks to increase the boundary of the site to consider the availability of land within the ownership of the Welsh Government associated with the Enterprise Zone.
- 4.35 Objections made in respect of Land to the South of Junction 34, Hensol sought to reduce the area of land allocated for development to reduce the loss of areas of nature conservation interest. Responses to employment site representations are in Annex 4.

### Strategic Policies

- 4.36 The Preferred Strategy contains 19 Strategic Policies. The strategy and housing and employment allocation policies (SP1, SP2, SP3, SP4 and SP13) are discussed above. The other policies have received small numbers of representations of support, objections and comments. Objections in relation to the policies generally sought to amend the wording of policies and supporting text to provide further clarity. Responses to Strategic Policy representations are in Annex 4.

## 5. Annexes

5.1 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. This includes proposed changes to the wording of sections of the Preferred Strategy as well as highlighting any further information that will be necessary to inform the Deposit RLDP.

5.2 The Annexes have been split as follows:

- Annex 1 – Response to the Welsh Government representation
- Annex 2 – Responses on the Preferred Strategy
- Annex 3 – Responses on the Key Sites and Rolled Forward Sites
- Annex 4 – Responses on the Strategic Policies
- Annex 5 - Introduction, Policy Context, Key Characteristics, Key Themes, Vision and Objectives
- Annex 6 – Responses on the ISA and HRA
- Annex 7 - Consultation and Welsh Language
- Annex 8 – Stage 2 Candidate Sites Register
- Annex 9 – List of organisations consulted on the Preferred Strategy



## Annex 1 Response to Welsh Government Representations

### Statement of General Conformity

Issue raised	Council Response	Action
<p>The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Preferred Strategy 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).</p> <p>Currently, there is a joint position statement on the relationship between Cardiff and the Vale of Glamorgan (BP20), which considers population growth, migration patterns, housing completions, commuting and transport links between both authorities. Whilst the Welsh Government supports the principle of this work, further evidence is required to demonstrate how regional collaboration has influenced the scale of growth in the Vale of Glamorgan and the relationship to all adjoining authorities, including Bridgend and Rhondda Cynon Taff.</p>	<p>The statement that the Preferred Strategy is in conformity with Future Wales is welcomed. See below in relation to regional collaboration.</p>	<p>N/A</p>

### Regional Collaboration – Further clarity and justification

Issue raised	Council Response	Action
<p>The Welsh Government supports the joint position statement (BP20) on the relationship between Cardiff and the Vale of Glamorgan on matters including population and migration, housing growth, commuting patterns and transport. The paper concludes/supports a reduction in the housing requirement (from the currently adopted plan). The paper suggests that an up-take of housing delivery on the strategic sites in Cardiff will reduce the number of working age moving into the Vale for new build family housing with both authorities not in direct competition with each other for planned growth. Whilst the Welsh Government does not object to the principle of this approach, it is unclear how the wider region,</p>	<p>The support for the Joint Position Statement with Cardiff (BP20) is welcomed. The Vale and Cardiff have a strong relationship, particularly from an employment/commuting and population/housing perspective, as discussed in detail within the paper.</p> <p>BP8 Demographic Evidence (prepared by Edge Analytics) considers the relationship with the other neighbouring authorities of RCT and Bridgend. This indicates that net</p>	<p>Regional growth report to form part of evidence base.</p> <p>Prepare joint statements with RCT and Bridgend to support Deposit Plan.</p>

<p>particularly Bridgend and Rhondda Cynon Taff, has been involved in shaping and agreeing the choices made and the consequences of any decisions taken by the Vale for other plans in the region and future Strategic Development Plan (SDP). Moving forward to Deposit, further work will be required to understand how the Preferred Strategy has been developed within the wider regional context as Future Wales brings a new perspective that all LDPs have to embrace on how each plan sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships in advance of the formal commencement of an SDP.</p>	<p>migration between the Vale and RCT/Bridgend has been consistently low over recent years and commuting flows between the areas are much lower than the flows to Cardiff. Notwithstanding this, the Council regularly engages with RCT and Bridgend as well as the other LAs within the Cardiff Capital Region.</p> <p>The Cardiff Capital Region LAs have recently commissioned work to consider regional growth in population and employment. The findings of this report, which also considers migration and commuting, will form part of the evidence base for the Deposit Plan and will address the concerns raised. Liaison will continue with the Vale's neighbouring authorities, and it is anticipated that further joint position statements will be prepared where appropriate.</p>	
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### Spatial Strategy - Location of Growth

Issue raised	Council Response	Action
<p>With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. It is noted that taking into account the existing land bank of 6060 dwellings, to meet the proposed housing requirement the authority needs to allocate around 2,600 units on new sites. As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (KS1- 5) on well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the candidate sites assessment process to assess sites and their proximity to transport nodes. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.</p>	<p>Support for the spatial option is welcomed.</p>	<p>N/A</p>

## Spatial Strategy – Primary Settlements

Issue raised	Council Response	Action
<p>The Council’s settlement hierarchy allocates circa 95% 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. However, as a result of the review process the settlements of Culverhouse Cross and Wick have been elevated (from that set out in the adopted plan) from Minor Rural Settlements to Primary Settlements. Both settlements are located outside the Strategic Growth Area and Policy SP2 is clear that in these settlements growth will be limited to the re-use of existing buildings, infill opportunities, small-scale affordable housing, and rural enterprises only. On this basis, the rationale for identifying Culverhouse Cross and Wick as Primary Settlements is unclear, especially as these settlements will perform the same function as the lower tier Minor Rural Settlements as set out in Policy SP2. The plan (6.47) makes clear that the Council will not support growth in Culverhouse Cross and Wick due to their rural location as any growth here would encourage car borne trips, which is contrary to the Preferred Strategy and exasperated by a lack of Key Services (BP5) in the settlements, particularly in Culverhouse Cross. The Council will need to evidence and justify the position of Culverhouse Cross and Wick as Primary Settlements in the hierarchy to ensure there will be no potential unintended outcomes in the implementation of the plan following adoption.</p>	<p>WG’s recognition that 95% of growth is in the top three tiers of the settlement hierarchy is welcomed.</p> <p>The Settlements Appraisal Review recognises that Culverhouse Cross and Wick have been elevated to primary settlements in the review. It is stated that there is a range of settlements within each tier. Whilst these score lowest in the primary settlement range, they collectively score higher in services/facilities than Minor Rural Settlements. Both settlements have grown in the previous plan period and this re-categorisation reflects this. Both settlements score well in different ways – the residents of Culverhouse Cross have good access to a range of shops etc and the area has good bus links, whereas Wick is more sustainable in terms of services to serve daily needs as the settlement has a school, post office, shop and pubs. A summary of the reasons is contained in paragraph 12.6.3 of BP5 but in light of WG concerns, further justification will be provided.</p> <p>In terms of unintended consequences, both areas are outside the Strategic Growth Area and therefore only small-scale affordable housing led growth or infill would be</p>	<p>Amend BP5 to include further justification on why Culverhouse Cross and Wick have been elevated to ‘primary settlement’ status.</p>

	<p>acceptable in principle, if appropriate sites where identified.</p> <p>In a primary settlement, affordable housing led schemes of up to 50 dwellings may be acceptable, whereas in the Minor Rural Settlement, the limit is 25. Both Wick and Culverhouse Cross have accommodated schemes of over 50 dwellings in the previous plan period, so the change in strategy approach would result in the potential for less development than in the adopted LDP. This reflects paragraph 6.47 of the Preferred Strategy, which states that <i>significant</i> additional growth would be contrary to the strategy.</p>	
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#### Level of Growth – Homes

Issue raised	Council Response	Action
<p>The 2018 WG Principal projections are the latest projections for this Preferred Strategy. Any future population and household projections based on the latest 2021 Census will need to be considered by the Council if they are published before the plan is examined.</p> <p>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 780 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 would not comply with FW/PPW in terms of sustainable development and transport. 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</p>	<p>Comments in relation to the 2021 Census are noted.</p> <p>Welsh's Governments comments on the level of growth are welcomed.</p> <p>Further evidence on deliverability will be published as part of the Deposit RDLP.</p> <p>Support for the change in emphasis of the Strategy away from rural settlements is welcomed.</p>	<p>Publish further deliverability evidence at Deposit stage.</p>

<p>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 moving forward to Deposit stage as required by Planning Policy Wales, Future Wales, and the Development Plan Manual.</p> <p>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.</p>		
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**Level of Growth – Jobs**

<b>Issue raised</b>	<b>Council Response</b>	<b>Action</b>
<p>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 Study (BP12) and as set out in Policy SP13. The Welsh Government notes that the level of employment growth could be higher (up to 13,978 jobs) if the total realistic land supply (177ha) was built out. However, this is a measure of job capacity the land could support and is not a forecast of new jobs with many of the strategic sites not anticipated to be completed until after the plan period post 2036.</p> <p>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 take into account low housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). On this basis, the Welsh Government has no significant concerns on the level of job growth proposed in the plan.</p>	<p>Comments noted and support is welcomed.</p>	<p>N/A</p>

<p>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.</p>		
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### Affordable Housing Provision

Issue raised	Council Response	Action
<p>The Summary Note of the draft Local Housing Market Assessment (LHMA) (BP10A) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option... In both models, the housing need is across all 13 Housing Market Areas and is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (54%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.</p> <p>On this basis, the Welsh Government has no significant concerns regarding the relationship between the emerging LHMA and the Preferred Strategy, however, as the LHMA is not yet finalised, the WG reserves its position this matter until the final report is published by Deposit stage.</p>	<p>Comment noted. The final LHMA will be published as part of the evidence base for the Deposit Plan.</p>	<p>Include the updated LHMA as part of the evidence base for the Deposit RLDP.</p>

### Affordable Housing Led Sites

Issue raised	Council Response	Action
<p>To deliver additional affordable housing above which market led housing can provide, the authority proposes (in Policy SP2) 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. 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</p>	<p>The support for the principle of the approach is supported. It is the intention that affordable housing led sites will be allocations in the Deposit RLDP and will consequently be included within the settlement boundary.</p> <p>Further consideration will be given to the viability and deliverability of sites. The Council would welcome further discussions and guidance on the necessary evidence for this policy approach.</p>	<p>Amend the supporting text of Policy SP2 to clarify that these sites will be allocated and included within the settlement boundary.</p>

<p>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. At present the plan and supporting evidence is unclear and sometimes contradictory as to whether these sites will be located within or on the edge of settlement boundaries. In addition, the scale and location of these sites is unclear (the Plan, Table 7 3, Row F) where no spatial locations or dwelling numbers are attributed to them. How does such an approach comply with the transport oriented spatial strategy?</p> <p>Affordable housing led sites that have a market element to them must be located within a settlement boundary in order comply with the requirements in TAN 2. Only 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN and any threshold/policy requirements set in the development plan. The approach to affordable housing led developments, their scale and location requires clarification and ensure compliance with national policy.</p>	<p>The Council considered numerous affordable housing-led schemes under the Stage 2 Candidate Site Assessment and the conclusions were published in the Stage 2 Candidate Site Register as part of the Preferred Strategy Consultation. A 2<sup>nd</sup> Call for Sites was conducted as part of the consultation in which the Council has encouraged the submission of further affordable housing-led schemes which are currently being assessed on their suitability to help meet and deliver affordable housing requirements. The Council are currently assessing these sites in mind of pursuing to allocate these affordable housing-led schemes outside of the Strategic Growth Area, which includes the Rural Vale. Further detail on these affordable housing-led schemes will be published as part of Deposit plan.</p>	<p>If sites are considered acceptable for allocation as affordable housing led schemes outside of the Strategic Growth Area, they will be identified as such in the Deposit Plan.</p>
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### Employment Land

Issue raised	Council Response	Action
<p>The Welsh Government does not object to the over-provision of employment land in the plan as the Enterprise Zone designation must be identified and the allocations within it (SP13: 1-3) are all subject to developer interest for specialist employment uses.</p>	<p>Comments noted, and the Enterprise Zone remains important to strengthening the role and economic/employment function of the Vale of Glamorgan.</p>	<p>NA</p>

### Deliverability

Issue raised	Council Response	Action
<p>We note that the Preferred Strategy has included emerging master planning/infrastructure work on key sites, and this is considered to be a good start to be built upon moving forward to Deposit.</p>	<p>The recognition of initial master planning work is welcomed, and the Council intend to continue this ahead of Deposit Plan Stage.</p>	<p>Continue work with developers on master planning the Key Sites.</p>

<p>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. We note that two of the Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units are dependent upon 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 Council, in conjunction with Transport for Wales, will need to robustly evidence the delivery of the sites and include feasibility work and the funding required to secure the new station in the early phases of developing the key sites. 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 available at Deposit stage. The Council will also need to demonstrate that these Key Sites and all other 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.</p> <p>The Deposit plan will also need to be supported by a high-level affordable housing study and sitespecific viability appraisals for Key Sites, where appropriate. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.</p>	<p>Comments in relation to the deliverability of sites is noted. In relation to viability, the Council will need to set up a Viability Steering Group and work with members to produce the required viability evidence to show sites are deliverable.</p> <p>With regard to the delivery of a train station in St Athan, the Council has actively engaged with Transport for Wales in developing proposals for a train station, and in March 2024 the Department for Transport announced funding for further feasibility for the reintroduction of a new train station at St Athan. As an interim measure, the Council are also exploring the potential for the provision of a park and ride facility at St Athan to enable improved access to train services at Llantwit Major in the interim prior to the development of the St Athan station.</p> <p>Notwithstanding this, the Council also view the two sites in St Athan as meeting key element number 2 of the Preferred Strategy: 'Aligning locations for new housing, employment, services and facilities to reduce the need to travel.' The sites are located in close proximity to the Bro Tathan Enterprise Zone and the Aberthaw site, where significant numbers of jobs are projected, and both sites will have strong active travel links to these. Furthermore, the allocation of these sites provides the opportunity to introduce new services and facilities into the St Athan locality, through the provision of a mixture of uses on site. The provision of these will further boost St Athan's sustainability and reduce the need to travel for existing and future residents.</p>	<p>The Council will work with developers to establish a Viability Steering Group and work with the members, including site-specific promoters, to produce the required viability evidence.</p> <p>The Council will continue to work with stakeholders in relation to the St. Athan sites to ensure that a development that meets the key elements of the Preferred Strategy is included within the Deposit Plan.</p>
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## Gypsies and Travellers

Issue raised	Council Response	Action
<p>By Deposit stage, the authority must meet its statutory duty and comply with requirements in Planning Policy Wales (4.2.35), Circular 005/2018 (paragraph 35) and the Development Plans Manual (5.80-5.85) to allocate sufficient and deliverable sites in the plan for unmet gypsy and traveller need.</p> <p>By Deposit stage, the Council will also need to ensure that any sites are supported by a transparent and robust site selection process that aligns with the requirements of Circular 005/2018 and any relevant guidance. The views of the relevant statutory bodies must also be agreed before Deposit stage with no outstanding objections to the delivery of the sites.</p>	<p>Comments noted. The Council will continue to work to identify a suitable site(s) to meet the need identified in the GTAA. The Deposit Plan will include more detailed site allocation and development management policies specific to gypsies and travellers.</p>	<p>Council to continue to progress work on identifying a suitable gypsy and traveller site or sites that meet the need identified in the GTAA. This work to be in accordance with the requirements of the relevant Welsh Government Regulations and guidance relating to gypsy and travellers. Council to include policies on site allocations and development management relating to gypsy and traveller sites within the draft Deposit Plan which is programmed to be formally</p>

		consulted in early 2025.
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## Renewable Energy

Issue raised	Council Response	Action
<p>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. Opportunities for district heating outside of Barry is considered in the study to be relatively limited.</p> <p>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) 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.</p> <p>The Deposit plan may identify solar and wind areas (where appropriate) above 10MW. In this instance, the plan will need to be clear that large-scale energy developments (&gt;10MW) are classed as Developments of National Significance (DNS) and will be considered by Ministers in accordance with the policies in Future Wales. The plan should also include a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW.</p>	<p>Comments are noted and it is acknowledged that the Deposit Plan will provide an identification of the thresholds that exist for energy development, which determine whether applications would be determined by the Local Planning Authority or the Welsh Ministers.</p> <p>Any commentary on thresholds for 'large-scale energy development' in the Deposit Plan will be informed by the thresholds that are in place at the time that it is consulted on. It is understood that the Infrastructure (Wales) Bill 2023 seeks to amend the existing thresholds and this may have come into effect by the Deposit Plan Stage.</p>	<p>Ensure that the Deposit Plan identifies the relevant thresholds that are in place, which set out whether an application for 'large-scale energy development' will be determined by the Local Planning Authority or the Welsh Ministers.</p>

## Minerals

Issue raised	Council Response	Action
<p>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</p>	<p>Comments are noted. A draft Statement of Sub-Regional Collaboration has been produced for the Cardiff City sub-region. The</p>	<p>Work with regional partners to agree a</p>

<p>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. However, by Deposit stage, the plan should be supported by a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region to explain how any shortfall will be met across the region, particularly for crushed rock, of which the Vale has a surplus.</p>	<p>Council will work with regional partners to agree this prior to Deposit Stage.</p>	<p>Statement of Sub-Regional Collaboration for the Cardiff City Region.</p>
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### Agricultural Land (As Summarised)

<b>Issue raised</b>	<b>Council Response</b>	<b>Action</b>
<p>The Welsh Government has no objection to the Preferred Strategy in respect of Best and Most Versatile (BMV) agricultural land. However, clarification is needed on candidate site assessment methodology, renewable energy assessment and BMV topic paper and issues should be considered during the preparation of the Deposit Plan.</p>	<p>Noted. BP23 on BMV Land will be updated to reflect the comments made.</p>	<p>Update BP23 to incorporate the comments on BMV Land</p>

### Welsh Language

<b>Issue raised</b>	<b>Council Response</b>	<b>Action</b>
<p>The ISA notes that issues relating to the Welsh language is currently not included and states that this will be further explored and addressed in the Deposit plan. Not including sufficient evidence on the impact of the Preferred Strategy on the Welsh language is a concern. Assessing the impacts on issues such as the Welsh language, should be fully aligned with the development of the plan early in the process and not at Deposit stage. There are no clear commitments on how the plan will sustain or support the further increase in the number of Welsh speakers within the local planning authority area in line with the Government's aspirations of supporting the increase in the number of Welsh-speakers and the use of the language. It would be of benefit if the Deposit plan could</p>	<p>Comments are noted, as set out in the ISA we will consider the implications of the Deposit Plan for the Welsh Language. As a part of this the Council will seek to engage with Menter Iaith y Fro.</p> <p>The Council will also produce a Welsh language Background Paper, which will consider the implications of the plan for the Welsh language.</p>	<p>The Council will engage with Menter Iaith y Fro and produce a Welsh language background paper.</p>

<p>outline and consider the following policy and acts as well as local strategies: • Welsh Language Measure (2011): especially in line with the authority's Welsh language standards of creating new policies • Cymraeg 2050: A million Welsh-speakers We would advise the authority to make contract with the local Welsh Language Initiative (Menter Iaith y Fro) for further help and support.</p>		
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## Strategic Options and Preferred Strategy

### Spatial Strategy Options

#### General Comments on Strategy Options

Issue raised	Council response	Action
<p>Vale is a greenbelt area.</p> <p>Loss of farmland.</p> <p>Contrary to aims on climate change.</p>	<p>None of the Vale is identified as green belt land, which is a specific planning designation designed for the long-term protection of land. Future Wales sets out the need for the Strategic Development Plan to identify a green belt in the Cardiff Capital Region, however the potential area does not include land in the Vale.</p> <p>As set out in the Green Infrastructure Assessment, 77.8% of the Vale of Glamorgan is agricultural land, amounting to 26,459 hectares. The strategy options would all require an element of development on agricultural land (in order to deliver a level of growth that would comply, as required, with Future Wales), but the overall total lost because of new development would be negligible. All strategy options would seek to protect the Best and Most Versatile (BMV) Agricultural Land.</p> <p>The climate emergency is a key consideration for all strategy options and the Preferred Strategy seeks to locate development in the most sustainable locations, reducing the need to travel and providing opportunities to travel by sustainable transport to minimise climate change impacts. Those climate impacts must be balanced and minimised in the context of the need to deliver an appropriate level of growth, that reflects the Vale's position within the National Growth Area in Future Wales.</p>	<p>N/A</p>
<p>Insufficient information available to agree with these options</p>	<p>The Preferred Strategy was accompanied by a background paper BP6 Spatial Options that provided details on the spatial options and the views of stakeholders and the Integrated Sustainability Assessment in shaping them.</p>	<p>N/A</p>

<p>Why was the brownfield strategy disregarded?</p> <p>Brownfield sites should be used in preference to greenfield sites</p>	<p>The Option was not considered realistic as insufficient previously developed land is available across the sustainable settlements of the Vale to meet housing requirements. Full details are set out in BP6 Spatial Options background paper which supported the Preferred Strategy.</p> <p>Notwithstanding this, the search sequence set out in national planning policy states that previously developed and under-utilised land in sustainable locations should be allocated before greenfield sites and this was a key principle across all strategy options.</p> <p>A significant proportion of the key brownfield development opportunity in the adopted LDP, Barry Waterfront, has been developed and whilst the remaining land will continue to be allocated, this alone will not meet housing requirements. There are several other smaller brownfield opportunities, but again these are not at a sufficient scale upon which to base a growth strategy.</p>	<p>N/A</p>
<p>Unable to determine the most appropriate spatial option until the Integrated Sustainability Appraisal is finalised as only in draft form and Stage 2 of the Strategic Transport Assessment is completed, as Stage 1 only looks at existing traffic flows.</p>	<p>The Initial Sustainability Appraisal Report was not published in draft form. The term 'Initial' reflects the fact that it was prepared to support the first stage in the process, i.e. the Preferred Strategy, and there will be a subsequent ISA that considered representations received and addresses the elements of the Deposit Plan that were not in the Preferred Strategy.</p> <p>A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan. This will include updated data, which will consider post-pandemic travel patterns and identify any mitigation that may be required to reduce the impact of the additional traffic from the sites.</p>	<p>N/A</p>
<p>The Self- Assessment and Integrated Sustainability Appraisal pays little attention to delivery of strategy</p>	<p>The purpose of the Initial Integrated Sustainability Appraisal (ISA) is to consider and communicate the likely effects of an emerging plan, and alternatives in terms of key sustainability issues. The aim of ISA is to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts.</p>	<p>N/A</p>

	<p>BP4 Assessment of the Preferred Strategy Against the Tests of Soundness explains how the RLDP accords with other policies and plans.</p> <p>The purpose of both documents is to assess parts of the plan, not explain how they are going to be delivered.</p> <p>Further detail on the delivery of key elements of the strategy will be set out in the Deposit Plan.</p>	
<p>Support that in all options, paragraph 5.5 notes that it would include utilising previously developed land before greenfield sites.</p>	<p>Support is welcomed.</p>	<p>N/A</p>

## Option 2 – Dispersed Growth

Issue raised	Council response	Action
<p>Preference to combine dispersed growth with the sustainable transport-oriented growth option as many issues arise from the preference for large and extensive developments rather than allowing for more holistic and gradual growth.</p>	<p>The preference for a combination of Option 2 and Option 4 is noted. In the strictest application of these options, there would be an inherent conflict. Option 4 seeks to focus developments in settlements that would reduce the need to travel and have good sustainable transport links, whereas Option 2 seeks to disperse growth.</p> <p>The Strategy has sought to identify a small number of larger sites because such sites would create a critical mass of development that would be more likely to generate significant Section 106 contributions and therefore deliver meaningful infrastructure improvements. Larger sites will also offer greater opportunities to deliver placemaking principles, such as a mix of uses, and offer options for biodiversity net benefits.</p>	<p>N/A</p>
<p>Option 2 (Dispersed Growth) is most optimal as it ensures that all sustainable settlements benefit from growth.</p>	<p>It is accepted that this is an advantage of the strategy. However, not all settlements have the services, facilities and public transport links necessary to make them sustainable and to accommodate that growth in a sustainable way that minimises/reduces the need for travel, particularly by unsustainable modes.</p>	<p>N/A</p>
<p>Dispersed growth would be a better option.</p>	<p>BP6 Spatial Strategy Options sets out the Councils reasoning behind the selection of Option 4 - Sustainable Transport Oriented Growth and the reasons why other options have been discounted.</p>	<p>N/A</p>



### Option 3 – Focussed Growth

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Elements of the Focused Growth Option need to be incorporated into the Preferred Strategy so that growth reflects the position in the settlement hierarchy. Wick is one such settlement.	BP6 Spatial Strategy Options sets out that under this option, growth would be focused based on the position in the settlement hierarchy, not based on the sustainability of the location. This would mean that the settlements of Wick, Culverhouse Cross and Wenvoe, which are primary settlements, but are not within the Strategic Growth Area identified in the Preferred Strategy, would be targeted for growth. None of these settlements relate well to the train network and, despite being primary settlements, they lack the services and facilities that some of the other (and larger) primary settlements have.	N/A

**Option 4 – Sustainable Transport Oriented Growth (forms basis of Preferred Strategy)**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Support for Sustainable Transport Oriented Growth Option in principle.</p> <p>Good placemaking principles support this approach and ensures connected communities.</p> <p>Priorities are correct.</p> <p>Strategy option supported by national, regional and local economic, transport and planning policy.</p> <p>Responds to the need for affordable housing.</p> <p>Strategy performs best against the majority of ISA criteria.</p> <p>The principles seem sound.</p>	<p>Support is welcomed.</p>	<p>N/A</p>
<p>Disagree with Sustainable Transport Oriented Growth as basis for strategy</p>	<p>Objections are noted, the reasoning behind the Councils selection of Option 4 Sustainable Transport Oriented Option are set out in BP6 Spatial Strategy Options.</p>	<p>N/A</p>

<p>Public transport is inadequate.</p> <p>Low numbers of people will cycle.</p> <p>Opportunities for modal shift are limited.</p> <p>How will sustainable travel be promoted? Just because the growth option is called 'sustainable transport', it doesn't mean people will use it.</p> <p>Rural nature of Vale means development will lead to more car travel, as people will travel to tourist attractions e.g. beaches that require a car.</p>	<p>The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with Transport for Wales (TfW) in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme.</p> <p>TFW have committed to introducing additional services at peak times and they propose to introduce new trains to the line with increased capacity.</p> <p>It is acknowledged that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of bus services. New development in an area will increase the population base of potential bus users, which can help support route sustainability.</p> <p>The five key sites are within walking and cycling distance of at least one existing or potential station, as shown on TfW isochrone maps, and all are in areas with regular bus services. The improvement to sustainable transport links will be required as part of the development.</p> <p>The Active Travel Network Map identifies a number of improvements. Improved routes will encourage people to cycle.</p> <p>It is recognised that for some people and some journeys, utilising modes other than the car will not be possible. However, the RLDP promotes sites that will give people options by developing in the right places to create a critical mass to support public transport and active travel. These developments will also contribute towards sustainable transport through Section 106 improvements within the local area.</p>	<p>Continued liaison with TfW and bus operators on rail and bus provision.</p>
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<p>A comprehensive review of bus connectivity and accessibility with reference to travel to work areas has not been undertaken, contrary to Para 3.45 of PPW.</p>	<p>PPW Para 3.45 states <i>“the evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself.”</i></p> <p>Bus connectivity has been reviewed as part of BP5 Settlements Appraisal Review, in addition, BP20 Joint Position Statement on the Relationship between Cardiff and the Vale of Glamorgan considers the matters referenced in Para 3.45, and specifically references travel to work areas.</p>	<p>N/A</p>
<p>Disadvantage of Option 4 listed as focussing development on a small number of settlements placing pressure on services and facilities and there may not be available sites. This applies to the proposal to extend Barry into Dinas Powys.</p>	<p>The analysis of the Strategy Options was undertaken early in the plan preparation process prior to the full assessment of sites. The candidate site assessment process then indicates that there were sites available in the areas at a scale that could deliver infrastructure improvements.</p>	<p>N/A</p>
<p>If you wish to prioritise Bro Tathan Enterprise Zone, Cardiff Airport and Aberthaw as important employment areas then build homes near them.</p>	<p>The Preferred Strategy includes two key housing sites in St Athan and one in Rhoose that relate well to the Bro Tathan and Cardiff Airport Enterprise Zones and the proposed Aberthaw Green Energy Park.</p>	<p>N/A</p>

<p>What employment opportunities which reduce the need to travel are provided by large residential developments?</p>	<p>Opportunities for mixed use developments are proposed at the largest of the key sites. The exact uses will be determined through the masterplanning process but could include retail, co-working hubs and community uses. A school is also proposed on the North East Barry site, which would also provide employment. Alongside this, allocations are proposed in close proximity to existing and proposed employment allocations.</p>	<p>N/A</p>
<p>Option should emphasise active travel as well as sustainable travel and how this will be achieved.</p>	<p>The term 'sustainable transport' used in the Preferred Strategy encompasses active travel. This accords with the glossary in Llwybr Newydd – The Wales Transport Strategy which describes Sustainable transport modes as <i>“types of transport that contribute to decarbonisation including walking and cycling, public transport and low- or zero emissions vehicles.”</i></p>	<p>N/A</p>
<p>Option 4 would be preferred option if properly applied.</p> <p>The principles of the strategy do not fit logically with the choice of sites.</p> <p>The sustainable transport element of the strategy has not been applied correctly as St Athan is currently poorly served by public transport and there are insufficient job opportunities meaning people must use private vehicles to travel out of the area for work.</p>	<p>It is considered that the 5 key sites identified accord with Option 4 Sustainable Transport Oriented Growth.</p> <p>The UK Government has recently announced that it will fund a business case to look at options for new station at St Athan. The allocation of additional housing will help support and underpin this business case.</p> <p>St Athan is well related to two significant employment allocations at Bro Tathan and Aberthaw, which further supports its position within the Strategic Growth Area.</p> <p>In addition, each key site will need to fund additional sustainable transport improvements.</p>	<p>N/A</p>

<p>Some key sites rely on future public transport that has not yet been approved.</p> <p>A location does not automatically become sustainable simply because it is labelled as Barry.</p> <p>Allocations only made along rail corridor whilst allocations in areas with excellent bus corridors would improve public transport in rural areas.</p>	<p>Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with re-use of existing buildings and infill opportunities.</p>	
<p>Agree in principle, although it is noted that this is a change in approach not seen in LDPs in Wales and as such is yet to be tested at Inquiry.</p>	<p>The Strategy accords with national planning policy and transport policy and is considered by Welsh Government to be in conformity with Future Wales.</p>	<p>N/A</p>
<p>This option would result in an overly high reliance on development in the largest settlements and place pressure on existing services and infrastructure.</p> <p>It would conflict with the objectives in Future Wales for Vibrant Rural Areas.</p>	<p>The strategy option focuses development in the most sustainable settlements in accordance with national planning policy.</p> <p>Welsh Government consider that the strategy is in conformity with Future Wales. Rural areas will still be supported as small-scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with the re-use of existing buildings and infill opportunities.</p>	<p>N/A</p>

<p>No account taken of the important role and proximity of Bridgend or Talbot Green/Pontyclun/Llantrisant which will provide job opportunities for settlements in the west and north.</p>	<p>The commuting relationship between the Vale and Bridgend and RCT is referenced in paragraph 3.34 of the Preferred Strategy. However, the fact that there is employment in neighbouring authorities to the north and west is not sufficient justification for locating new housing in unsustainable locations where there is a lack of sustainable transport to access this employment.</p>	<p>N/A</p>
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## Growth Options

### General Comments on Growth Options

Issue raised	Council response	Action
<p>Need to consider older people and those wishing to downsize, which would free up larger homes.</p>	<p>Policy SP8 on Specialist and Affordable Housing recognises that there is a need for specialist older person housing within the Vale of Glamorgan. A detailed policy on this will be included at Deposit stage.</p>	<p>Provide further policy guidance on specialist housing at Deposit stage.</p>
<p>Unable to comment without details of how the supported infrastructure will be provided</p>	<p>An infrastructure plan will be prepared to provide further details on the infrastructure requirements in the Deposit Plan.</p>	<p>Provide further details on infrastructure in the Deposit Plan.</p>
<p>Brownfield sites should be used first.</p>	<p>In accordance with national planning policy, the Preferred Strategy and its supporting evidence base recognises that brownfield land should be utilised before greenfield sites in the first instance. However, the Preferred Strategy also recognises that there is insufficient appropriate brownfield land available to deliver a brownfield only strategy. As such, there is a need to allocate greenfield sites.</p>	<p>N/A</p>

<p>The section only refers to land for housing and employment. There should be consideration of land required for active travel routes linking these to existing areas.</p>	<p>The Deposit RLDP will include allocations for other land uses. Proposed Active Travel routes are shown on the Active Travel Network Map.</p>	<p>N/A</p>
<p>Where is the evidence that RLDPs being prepared by neighbouring authorities are not going to impact on the Vale's requirements?</p> <p>Will suitable employment be available for new residents?</p>	<p>Paragraphs 2.59-2.62 sets out the collaboration that has taken place with neighbouring authorities in respect of plan preparation. The Council has also prepared BP20 Joint Statement with Cardiff, and it is intended to expand this to the adjoining authorities of Bridgend and RCT as part of the evidence base for the Deposit Plan.</p> <p>The employment and housing evidence bases have been aligned to ensure that employment growth is commensurate with housing growth.</p>	<p>N/A</p>
<p>It is unclear how the growth has taken account of refugees and asylum seekers. Temporary and permanent homes for resettling people will be needed.</p>	<p>It is difficult to forecast refugee and asylum numbers as these will vary in light of international circumstances and Government policy. However, there is an assumption in the population projections for international migration, which would account for those permanently settling in the Vale.</p> <p>The Council is making provision for refugees and asylum seekers in accordance with its statutory duties and housing policies. Where uses are temporary, these will not normally be included in the housing figures.</p>	<p>N/A</p>
<p>The growth and changing demographics over the last 10 years places pressure on services. The UHB is undertaking an assessment of capacity across its services and will work with the local authority to address the impact of the preferred growth option in the Plan.</p>	<p>This assessment of capacity work currently being undertaken by the UHB is welcomed. The Council will continue to work with the UHB to address any impacts identified as a result of future development. It is intended that a background paper on health provision will be prepared as part of the Deposit Plan.</p>	<p>N/A</p>



It is impossible for a lay person to comment on lengthy and complicated documents and reports.	The concern is noted. However, an Easy Read version of the Preferred Strategy has been made available and lengthy background documents include an executive summary.	N/A
General support for medium growth option but there must a correlation between the number of homes and the jobs generated with realistic infrastructure and public transport.	Support is welcomed. It is accepted that there should be a correlation between homes, jobs and infrastructure and public transport and this is a key element of the Preferred Strategy. The Council is actively working with the site promoters and other infrastructure deliverers to ensure this is the case.	N/A

### Support for Growth Options

Issue raised	Council response	Action
<p>Medium level of growth seems realistic.</p> <p>Broad support for growth strategy.</p> <p>Level of growth needed to address homelessness.</p> <p>Level of growth would accord with Future Wales national growth area.</p>	Support is welcomed.	N/A

### Objections to Housing Growth Options – growth should be lower

Issue raised	Council response	Action
<p>Proposed level of growth is too high.</p> <p>The predictions for medium growth seem to be based on fantasy.</p> <p>Figure is only a projection.</p>	The Council commissioned Edge Analytics to prepare a technical paper that considered a variety of growth options for the RLDP (BP7 Housing & Employment Growth Options). The Council therefore considers that the level of growth identified in the Preferred strategy is robust and supported by appropriate evidence.	N/A

<p>Level of growth is contrary to Future Wales – ignores climate and nature emergencies and town centre first policy.</p> <p>No evidence given that Vale has 'sufficient capacity.'</p> <p>Impact on food production due to loss of agricultural land.</p> <p>Will result in loss of green fields and green wedges.</p>	<p>The Vale is located within a Future Wales national growth area where strategic economic and housing growth should be focused. Future Wales is clear that places should grow in a sustainable way and in a way that promotes placemaking. This approach has informed the Preferred Strategy. By locating sites in the sustainable places and avoiding sites with high ecological value, the impact on the climate and nature emergencies is reduced.</p> <p>The town centre first policy is recognised in Policy SP10. The policy states “<i>significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres.</i>” Town centres are also considered as an appropriate location for new homes, through “<i>opportunities for small-scale development, including new housing and mixed-use development.</i>” It is unrealistic to expect town centres alone to accommodate the housing and employment requirements, but Policy SP10 recognises the roles they can play.</p> <p>The candidate site assessment BP18, together with the BP6 Spatial Strategy Options, considers the suitability of sites and areas for growth and it is considered that there is sufficient land that is acceptable in principle and accords with the strategy.</p> <p>As set out in the Green Infrastructure Assessment, 77.8% of the Vale of Glamorgan is agricultural land, amounting to 26,459 hectares. The strategy options would all require an element of development on agricultural land (to deliver Future Wales compliant growth), but the overall total lost because of new development would be negligible. All strategy options would seek to protect the Best and Most Versatile (BMV) Agricultural Land.</p> <p>The Strategy indicates that there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth for the within the Vale of Glamorgan over the plan period and accepts that greenfield land will also therefore need to be released.</p>	<p>N/A</p>
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	<p>A Green Wedge is a local designation that is reviewed as part of the development plan process. A review of Green Wedges will inform the Deposit Plan.</p>	
<p>No provision for sufficient infrastructure to support the proposed growth in dwellings.</p> <p>Growth will impact on existing healthcare and schools.</p> <p>Links to employment in Cardiff are poor.</p>	<p>The Council are liaising with key infrastructure providers to determine the impact and any mitigation that would be required. Developments will be required to provide the infrastructure necessary to make the development acceptable.</p> <p>The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the RLDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly.</p> <p>The Council are liaising with Cardiff and the Vale University Health Board to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, CAVUHB will be able to plan for future service requirements and plan accordingly.</p> <p>A significant proportion of Cardiff's employment is within the city centre. This can be accessed by rail or bus or via a network of Active Travel routes from the Vale.</p>	<p>N/A</p>

<p>Council is being led by developers rather than by evidence and expressed need.</p>	<p>The RLDP is informed by an extensive evidence base that has informed the growth options – this includes the BP10A LHMA, BP7 Housing and Employment Growth Options BP8 Demographic Evidence and BP12 Employment Land Study. Development sites included in the Preferred Strategy have been identified through an ‘open’ Call for Candidate Sites and all sites submitted through this process have been subject to an assessment by the Council in accordance with an approved and published assessment methodology.</p>	<p>N/A</p>
<p>No consideration given to the need for additional policing as new housing has resulted in an increase in anti-social behaviour</p>	<p>In their representations to the Preferred Strategy South Wales Police have not identified any capacity issues.</p>	<p>N/A</p>
<p>Need to provide homes for local people, rather than giving priority to incoming people.</p> <p>Homes should be delivered in consideration of those in greatest need for housing rather than the gain of landowners.</p> <p>Lower growth would mean no new sites are needed.</p> <p>We should not be catering for Cardiff's overspill.</p>	<p>The RLDP will include a range of development sites across the Vale of Glamorgan which will cater for local residents as well as those wishing to move into the area. Affordable Housing in the Vale of Glamorgan is allocated via the Homes4U lettings scheme according to a household's need. Applicants are able to request a preferred location where they would prefer to live. A preference is given to applications with a local connection to the Vale of Glamorgan.</p> <p>The need for affordable housing as set out in the LHMA has informed the Preferred Strategy, with development being targeted to the areas with the highest need.</p> <p>It is accepted that lower growth options would mean fewer or no new sites would be allocated. However, such an option would impact on the delivery</p>	<p>N/A</p>

<p>Strategy underplays commuting to Cardiff.</p>	<p>of the significant level of affordable housing need and would not be compliant with Future Wales.</p> <p>BP20 Joint Statement with Cardiff recognises that the Vale has seen significant in-migration from Cardiff. However, Cardiff's strategic sites are now being developed after a long lead in time. The level of growth in the respective RLDPs is considered to be complementary.</p> <p>The Preferred Strategy recognised that there is a net out-commute to Cardiff (see Section 3 Economy and Employment) but seeks to ensure that there is sufficient new employment to align with housing.</p>	
<p>The Preferred Strategy should not solely be on the basis of 'need' factors and more practical and 'human' factors should be considered.</p>	<p>The housing requirement is based on a consideration of a range of evidence in accordance with Planning Policy Wales. Paragraph 4.2.6 states "<i>Appropriate consideration must also be given to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities.</i>" BP7 Housing and Employment Growth Options consider this, and detailed consideration is also given in the Integrated Sustainability Appraisal.</p> <p>Practical and human factors would include addressing the significant need for affordable housing across the Vale to ensure people have a home.</p>	N/A
<p>Need to look at empty homes, shops, offices and warehouses, not only greenfield land.</p> <p>Effect of Covid has meant town centre properties could be repurposed or redeveloped as affordable housing.</p> <p>Refurbish existing housing stock as a priority.</p>	<p>The housing land supply calculation includes an assumption for windfall development, which would include the re-use of existing buildings, including within town centres where appropriate (based on previous windfall rates).</p> <p>The need to refurbish existing housing stock is noted. However, unless this is creating a new dwelling, this would not to be counted as new housing for the purposes of the housing requirements.</p>	N/A

<p>Solely considering housing numbers and employment fails to consider the effect of this scale of development on the Vision and all objectives. If new housing can't be provided without adversely affecting these objectives, then a lower growth option should be considered. A further assessment is required as to whether the benefits of a higher rate of growth outweigh the severe negative impacts.</p>	<p>The Vision and Objectives seek to balance a range of issues, including Objective 3 'Homes for All.' The level of growth will not have an adverse impact on the Vision and objectives provided the right sites in sustainable locations are chosen, which is what the strategy seeks to do.</p> <p>It should be noted that the housing growth figure is based on medium growth rather than higher growth levels. The ISA has undertaken an assessment of the levels of growth (low, medium and high). Medium growth had a greater number of positive impacts on the themes of the ISA than low growth, and also less negative impacts than high growth.</p>	<p>N/A</p>
<p>The evidence suggests that the working age population will not materially increase and that there is an outflow of young people who may not return.</p> <p>The level of the Growth does not appear to be supported by the statistics for population growth or employment land take up over the last 5 years.</p>	<p>As set out in BP7 Housing and Employment Growth Options, the preferred growth option would see an increase in the working age and younger population, as this option would result in a level of in-migration to deliver more balanced demographics.</p> <p>Both the population and employment evidence take a longer-term view and consider a wider evidence base rather than basing assumptions on the last 5 years – a period that has greater variables due to wider economic circumstances.</p>	<p>N/A</p>
<p>The housing growth option does not consider wider housing industry and market conditions – demand for housing has reduced and a number of large developers have gone into administration.</p>	<p>The RLDP is a 15-year plan that must take a long-term view. Market conditions are likely to vary over a plan period with periods of strong economic performance where housebuilding exceeds projected levels, and other times where development is lower. The preferred growth option considers a 10-year period, which reflects times of good and poor market conditions.</p>	<p>N/A</p>

<p>Development over recent years has been poor quality with developers not providing community elements. If we want better, we can't expect that same rate of building.</p>	<p>The RLDP will place a greater requirement on developers to adhere to placemaking principles and deliver Section 106 requirements. It is not necessarily the case that improving the quality of development would result in slower delivery, but the Council hold a housing stakeholder group to discuss likely delivery rates on allocated sites. This will form part of the evidence for the Deposit Plan.</p>	<p>N/A</p>
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### Objections to Housing Growth Options – growth should be higher

Issue raised	Council response	Action
<p>A higher growth option should be used. This would increase the working age population, increase Section 106 contributions and accord with Future Wales' national growth area.</p> <p>The figure is unambitious. There is no meaningful explanation as to why the dwelling-led 10-year scenario has been chosen.</p> <p>The ISA indicates that the high growth option performs better than medium growth on a number of criteria. Where it performs poorly is on environmental impact, but these would not be negative with the right sites chosen.</p>	<p>The RLDP is informed by an extensive evidence base that has informed the growth options – this includes the BP10A LHMA, BP7 Housing and Employment Growth Options BP8 Demographic Evidence and BP12 Employment Land Study. Welsh Government has indicated that they consider the level of growth set out in the Preferred Strategy to be in conformity with Future Wales.</p> <p>BP7 Housing and Employment Growth Options provides the evidence for why the preferred growth option has been chosen.</p> <p>Table 6.1 of the ISA indicates that the medium and high options have the same number of positive impacts, but the high growth option scores negatively in respect of two criteria.</p> <p>The use of short-term trends to determine growth figures is not considered appropriate. The preferred growth option considers a 10-year period, which reflects times of good and poor market conditions.</p>	<p>N/A</p>

<p>A dwelling led scenario reflecting a 5- or 6-year period would be more appropriate.</p>		
<p>Pushing for ambitious high growth would facilitate delivery of homes for all.</p> <p>The argument that the Vale should not compete with Cardiff is not a reason.</p>	<p>It is recognised that a higher level of growth would increase the opportunity to deliver more affordable housing. However, the 'Homes for All' objective needs to be balanced with the other objectives within the Plan.</p> <p>The requirement for the plans of neighbouring authorities to be consistent/compatible with each other is a test of soundness. As set out in BP20 Joint Statement with Cardiff, the level of growth within the Preferred Strategy is considered to be compatible.</p>	<p>N/A</p>
<p>The adopted LDP requirement of 631 units per annum wasn't met due to restrictions on granting permissions in the first 4-5 years of the plan period. It is proposed that a 5-year dwelling led scenario or 6-7 years post LDP adoption would be more appropriate.</p>	<p>The use of short-term trends to determine growth figures is not considered appropriate. The preferred growth option considers a 10-year period, which reflects times of good and poorer market conditions.</p>	<p>N/A</p>



<p>Basing growth on past build rates is contrary to the Development Plans Manual (para 5.55-5.57).</p> <p>It incorporates recession-based trends and low completions due to the Covid-19 pandemic and cost of living crisis. This has affected household formation rates, but this will return to long term trends if housing is available.</p> <p>The level of growth is contrary to Future Wales growth area.</p> <p>Does not seek leverage from CCR City Deal</p> <p>Conflicts with Homes for All and the Economy objectives of the RLDP.</p> <p>A higher growth such as the PG-5Y scenario would be more appropriate.</p>	<p>The DPM states “<i>Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement. Tables 13 and 15 give examples of alternative scenarios to give a broad range of potential outcomes.</i>”</p> <p>The DPM does not therefore state that past build rates cannot be used, but rather they shouldn’t be simply taken without consideration of other scenarios and considering the wider evidence base. BP8 Demographic Evidence sets out that 12 scenarios were considered and BP7 Housing and Employment Growth Options identifies how the wider evidence base has been considered.</p> <p>The use of short-term trends to determine growth figures is not considered appropriate. The preferred growth option considers a 10-year period, which reflects times of good and poor market conditions.</p> <p>The Welsh Government have indicated that they consider the level of growth within the Preferred Strategy to be in conformity with Future Wales and is therefore considered to be suitably ambitious.</p> <p>CCR City Deal has been considered in the wider context for the Plan.</p> <p>It is recognised that a higher level of growth would increase the opportunity to deliver more affordable housing and potentially more land for employment. However, the ‘Homes for All’ and ‘Building a Prosperous and Green Economy’ objectives need to be balanced with the other objectives within the Plan. It would be more challenging to find appropriate sites in sustainable locations to support a higher level of growth.</p>	<p>N/A</p>
<p>A dwelling led 5-year scenario is more appropriate as the preferred option is insufficient.</p>	<p>The use of short-term trends to determine growth figures is not considered appropriate. The preferred growth option considers a 10-year period, which reflects times of good and poor market conditions.</p>	<p>N/A</p>

<p>There is a latent retail need that will increase in future years. Additional retail development is needed to support growth.</p>	<p>The Preferred Strategy has been informed by and includes recommendations derived from a detailed retail assessment of the Vale of Glamorgan (BP13 Retail and Leisure Study).</p>	
<p>Basing future growth on historic build rates lacks aspiration and does not align with Future Wales. These rates of delivery predate Future Wales (2022) so do not align with national policy.</p> <p>New housing will be required to support economic growth linked to the Enterprise Zones, Aberthaw and the airport.</p>	<p>The Welsh Government have indicated that the level of growth within the Preferred Strategy to be in conformity with Future Wales.</p> <p>New housing is proposed on key sites near the Enterprise Zones and Aberthaw in St Athan and Rhoose.</p>	N/A
<p>Basing future requirements on historic delivery neglects the fact that there is a housing shortage.</p> <p>A higher growth rate with higher flexibility allowance should be included.</p>	<p>The need for affordable housing is a significant factor in determining the growth figure, but a wider evidence base and other objectives also need to be considered.</p> <p>The Welsh Government have indicated that the level of growth within the Preferred Strategy to be in conformity with Future Wales.</p>	N/A
<p>Despite a number of growth options being explored, the LPA appear to have adopted the most convenient option, limiting the full potential. A more aspirational build rate is required.</p>	<p>The growth option chosen is the one considered most appropriate within the context of the wider evidence base and the preferred option of stakeholders in the engagement process.</p>	N/A
<p>With a lower forecast, greenfield sites would not be required, and consideration given to using brownfield employment sites for residential purposes.</p>	<p>Due to the lack of sufficient brownfield land available within the Vale of Glamorgan, there would be a need for develop on greenfield land even if a lower housing requirement was identified.</p> <p>The employment provision has over-allocated to allow for choice and flexibility and this does include greenfield sites. However, there are no new</p>	N/A

	greenfield sites proposed for employment – those identified are already allocated for employment in the adopted LDP and therefore the principle of development has already been established.	
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### Support for Employment Growth Option

Issue raised	Council response	Action
Support  The level of growth reflects past take-up levels and the available and deliverable employment land supply.	Support is welcomed.	N/A

### Objections to Employment Growth Options

Issue raised	Council response	Action
Objection to the employment land requirement as it is too large.  Just because premises are built, it doesn't mean that businesses will be attracted to the area. This level of growth is optimistic.	The employment provision is informed by BP12 Employment Land Study. The study has been prepared in accordance with the methodology set out in TAN 23: Economic Development and the Development Plans Manual.	N/A
This level of employment land provision is not needed as we have sufficient offices bases such as Council office spaces and unused buildings which need to be utilised first.	The employment land provision relates to new employment sites. As is the case in the adopted LDP, the Deposit Plan will set out a policy protecting existing employment sites and premises, which assist in the re-use of offices in appropriate locations.	N/A

<p>There are no incentives for companies to come to the Vale of Glamorgan.</p> <p>We need to encourage the growth of small-scale local businesses.</p>	<p>The comment on incentives for companies is noted, however such provision is outside the scope of RLDP however the Council's economic development team work to encourage businesses into the Vale of Glamorgan and support small scale local businesses.</p>	
<p>Aligning jobs with the population increase would not necessarily reduce the need for out-commuting.</p>	<p>The alignment of housing with jobs will ensure that the level of new jobs will be proportionate to the level of new homes. It is recognised that there will still be out-commuting, but this alignment will ensure that this is not exacerbated.</p>	<p>N/A</p>
<p>Need to consider implications of Port Talbot and Immingham on Barry Port</p>	<p>The comment is noted. However, this is outside of the remit of the RLDP.</p>	<p>N/A</p>

<p>Plan assumes that allocations in a limited number of locations will deliver jobs. This is unrealistic.</p>	<p>The employment allocations in the Preferred Strategy are informed by BP12 Employment Land Study. The study has been prepared in accordance with the methodology set out in TAN 23: Economic Development, 'Practice Guidance – Building an Economic Development Evidence Base to Support a Local Development Plan' and the Development Plans Manual.</p>	<p>N/A</p>
<p>Lack of evidence for demand. Plenty of employment land is already allocated in the LDP – contrary to TAN 23. The market has been flooded with potential sites. It is wrong to allocate further land when Cardiff Council have been instructed to increase their B1/B2/B8 supply.</p> <p>Contrary to the requirements of 'Town Centre First.'</p>	<p>The majority of sites identified in Policy SP13 Employment Growth have been carried forward from the adopted LDP.</p> <p>The demand for employment land is addressed in BP12 Employment Land Study.</p>	<p>N/A</p>

<p>Past take up rates have been influenced by one off inward investment – Bosch (now Renishaw) and Aston Martin Lagonda.</p>	<p>The Preferred Strategy has been informed by BP12 Employment Land Study. The study has been prepared in accordance with the methodology set out in TAN 23: Economic Development, 'Practice Guidance – Building an Economic Development Evidence Base to Support a Local Development Plan' and the Development Plans Manual. This considers that past take up rates is an appropriate methodology.</p>	<p>N/A</p>
<p>Need to upgrade existing enterprise zones first.</p> <p>Basic infrastructure needed.</p>	<p>A planning application is currently awaiting determination at Bro Tathan for the provision of above and below ground utilities, associated infrastructure and reprofiling of land. If approved and implemented, this will improve the infrastructure at part of the Enterprise Zone.</p>	<p>N/A</p>
<p>More evidence of the need for land for employment is required especially as in 3.36 earlier in the Plan it is stated that the number of jobs has remained constant over the last 5 years.</p> <p>Is there evidence that land availability is directly reflected in the creation of additional jobs?</p> <p>Has the move to hybrid working been accounted for in drawing up these projections?</p>	<p>The Preferred Strategy has been informed by BP12 Employment Land Study. The study has been prepared in accordance with the methodology set out in TAN 23: Economic Development, 'Practice Guidance – Building an Economic Development Evidence Base to Support a Local Development Plan' and the Development Plans Manual.</p> <p>BP12 references homeworking and changes to working patterns and the implication this has had on the rationalisation of office accommodation.</p>	<p>N/A</p>

## Preferred strategy

### Strategic Growth Area

Issue raised	Council response	Action
<p>Support for the Strategic Growth Area</p> <p>Support for the inclusion of St Athan in the Strategic Growth Area</p> <p>Support for the Strategic Growth Area at Cowbridge</p>	<p>Support is welcomed.</p>	<p>N/A</p>
<p>General objection to Strategic Growth Area</p>	<p>The objection is noted.</p>	<p>N/A</p>
<p>The building of more houses from Llandough to Barry is absurd. The infrastructure is just not in place.</p>	<p>This area has been included within the Strategic Growth Area as it is the most sustainable in terms of the availability of services and facilities and good public transport (4 trains an hour). Where new infrastructure is required to support the development, developers will be required to provide this.</p>	<p>N/A</p>
<p>Why is there no growth for the land between Penarth and Sully and the land between Barry and the A48?</p>	<p>The land to the south of Penarth (Upper Cosmeston Farm) is allocated for 576 dwellings in the adopted LDP and this allocation is proposed to be rolled forward into the RLDP.</p> <p>The land north of Barry to the A48 would not comply with the proposed Preferred Strategy option that was the subject of the public consultation.</p>	<p>N/A</p>
<p>The A48 is shown as a main connectivity route. Then why is no housing proposed along there?</p>	<p>Cowbridge is located on the A48 and has been included within the Strategic Growth Area and has two rolled forward sites identified. The other settlements on or close to the A48 are Minor Rural Settlements where new development would be limited to small scale affordable housing led development if appropriate given the relatively lower sustainability scoring.</p>	<p>N/A</p>

Climate emergency means we have to do things differently – we can't keep growing as before.	The level of growth planned in the RLDP is lower than in the adopted LDP. It seeks to balance a number of aims such as the climate emergency with the Vale's position within a Future Wales National Growth Area and the significant need for affordable housing that exists.	N/A
Too many houses in St Athan – there must be a correlation between the number of homes, jobs and supporting infrastructure.  St Athan shouldn't be in the Strategic Growth Area due to poor public transport access.  All other areas have a train station apart from St Athan.	The UK Government has recently announced that it will fund a business case to look at options for new station at St Athan. The allocation of additional housing will help support and underpin this business case.  St Athan is also well related to two significant employment allocations at Bro Tathan and Aberthaw, which further supports its position within the Strategic Growth Area.	N/A
Appropriate growth should be directed to Peterston-Super-Ely as was the case for less sustainable Minor Rural Settlements in the UDP and LDP.	The Settlements Appraisal Review (BP5) has undertaken a thorough assessment of the services, facilities, employment opportunities and public transport links in all settlements and Peterston Super Ely's score is not considered sufficient to warrant its inclusion as a higher tier settlement, or to be located in the Strategic Growth Area.  The fact that the UDP and adopted LDP allowed for growth in Minor Rural Settlements does not mean such a strategy continues to remain appropriate, particularly in light of significant changes to national planning and transport policy.	N/A
The Strategic Growth Area should be extended to include the A4050 corridor from Barry to Culverhouse Cross, including Wenvoe.	The Strategic Growth Area follows the line of the rail corridor, with the exception of Cowbridge, which has been included as it is a sustainable settlement in its own right, offering services and facilities to meet every day needs, reducing the need to travel.	N/A



<p>The Strategic Growth Area is very narrowly defined leaving out most of the LA.</p>	<p>Wenvoe and Culverhouse Cross have been excluded from the Strategic Growth Area as they are not served by existing or proposed rail links and do not have the range of services within them that would reduce the need for residents to travel.</p> <p>The Strategic Growth Area follows the main population centres. The area outside the strategic growth is more rural in character and settlements are generally less sustainable.</p>	
<p>A policy should be created for the Strategic Growth Area. This designation is not justified in the RLDP in terms of its purpose or why land is in or excluded.</p>	<p>Section 6.36 of the Preferred Strategy explains what the Strategic Growth Area is and the geographical area it relates to is subsequently shown in the key diagram at Figure 12 and referenced in Policy SP1. Further detail on settlements outside of the Strategic Growth Area and how these will be considered are included in Paragraph 6.47 onwards.</p>	N/A
<p>The limit to the quantum of development that can be delivered outside the Strategic Growth Area is not appropriate or based on evidence.</p>	<p>The strategy approach to development outside the Strategic Growth Area is a policy choice informed by national policy, which emphasises the importance of developing in sustainable locations that reduce the need to travel and allow for opportunities to travel by sustainable modes. The justification is set out within the series of background papers that support the Preferred Strategy.</p>	N/A
<p>The northern corridor adjacent to the B4265 should be included within the Strategic Growth Area as this is the least constrained land at Llantwit Major.</p>	<p>The Strategic Growth Area has been drawn to reflect the existing settlement boundary in Llantwit Major in order to ensure a sufficient buffer between the town and the settlement of Llanmaes, which has conservation area status.</p> <p>As part of the second call for sites, a candidate site proposed for mixed use has been submitted in this area. This is in addition to the candidate site for retail on a smaller parcel of land in the same area, currently subject to a planning application, and a candidate site submitted to allocate the site as a green wedge. The future use of this area will need to consider the outcome of the determination of the planning application, together with the assessment of the new candidate site and the green wedge review, which will form part of the evidence base for the Deposit Plan.</p>	N/A

It is questioned why Cowbridge is being treated differently to other settlements with good bus links but no train line.	Paragraph 6.21 of the Preferred Strategy outlines that Cowbridge is a sustainable settlement in its own right and “ <i>As identified within the Settlements Appraisal Review, Cowbridge is also a sustainable location with a thriving high street accommodating a supermarket and a range of other shops, services and facilities which cater for everyday needs, reducing the need to travel. It also has primary and secondary schools, a leisure centre and health facilities.</i> ” As a Service Centre Settlement, it is a sustainable settlement in its own right, and it is appropriate to have a different strategic approach to other settlements that are lower in the settlement hierarchy.	N/A
The former power station at Aberthaw is shown as an employment area opportunity. What employment exactly?	Further detail on the proposals at Aberthaw are included with paragraphs 6.148 and 6.149 of the Preferred Strategy.	N/A
New developments need to be located in Barry which is the main area of need, not rural areas with limited infrastructure and facilities.	The plan makes provision for new housing in Barry. However, it would not be appropriate or feasible to focus all new housing developments within or adjoining a single settlement, particularly given the significant need for affordable housing that exists across the Vale and other physical/environmental constraints around the town.	N/A
Only one key site is proposed in Barry. A greater level of growth needs to be attributed to the settlement. It is stated that Barry will remain the focus for further development but only 27% of the growth is attributed to the key settlement.	The plan makes provision for new housing in Barry. However, it would not be appropriate or feasible to focus all new housing developments within or adjoining a single settlement, particularly given the significant need for affordable housing that exists across the Vale. The largest allocation in the Preferred Strategy is an extension to Barry to the North East. Appendix 1 – Existing Land Supply, indicates that there are 14 sites with extant planning permission for housing in Barry, which is more than any other area, and a further site at Pencoedtre Lane is intended to be rolled forward. Barry is also expected to deliver the greatest number of windfall sites.	N/A

### **Key Diagram**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
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<p>The key diagram ignores the green and blue heritage and those areas that cannot or should not be built on – SSSIs, Country Parks, coastal path, SINCs, green wedges and flooding zones.</p>	<p>As part of the evidence base for the plan, BP6 Spatial Strategy Options, considers the key constraints and how these have influenced strategy choices through a series of maps.</p> <p>The Development Plans Manual states “<i>the strategy should be illustrated on a key diagram summarising the main elements (e.g. generalised symbols and arrows – Not O.S. based).</i>” At the scale shown it would not be possible to include all environmental protections in a manner that would be legible for users of the key diagram. More detail on such designations will be included on the Proposals and Constraints Maps that will accompany the Deposit Plan.</p>	<p>N/A</p>
<p>The key diagram should be altered to more visually show existing bus routes and the connections between settlements.</p> <p>The thickness of the line should change with frequency of service.</p>	<p>Vale bus routes are shown on the Key Diagram, but in the printed version of the document the clarity could be improved. The diagram shows the key connections within the Vale and to/from adjoining authorities. Including further routes is likely to impact on the clarity of the key diagram.</p> <p>The Proposals and Constraints Maps that accompany the Deposit Plan will provide greater detail.</p>	<p>Improve the clarity of the bus routes layer on the key diagram. This could include changing the thickness of the line to reflect frequency if this does not impact on clarity.</p>
<p>The map shows bus links but these are changeable due to private providers.</p>	<p>It is noted that bus links may be subject to change, but the Council can only reflect what is known at the point of plan preparation. This will be kept up to date through the plan process.</p>	<p>Amend the bus routes to reflect changes in routes if required.</p>
<p>Agree that the settlement boundaries shown on the Key diagram (Figure 12) is appropriate.</p>	<p>Support is welcomed. However, it must be noted that there will be a review to the settlement boundaries to incorporate new allocations at Deposit Stage.</p>	<p>Amend the settlement boundaries on Proposals Map at Deposit Plan stage to reflect</p>

		the findings of the Settlement boundary review.
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### **Support for the Preferred Strategy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
General support for the key elements of the Preferred Strategy	Support is welcomed.	N/A

### **General Objections to Preferred Strategy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Objection to the Preferred Strategy	The objections are noted.	N/A
<p>Rather than embracing culture and heritage, the plan seems to want to remove it.</p> <p>Housing sites are in inappropriate locations.</p> <p>This is a strategy for urban creep.</p>	<p>The Preferred Strategy clearly recognises the importance and benefits of the historic environment of the Vale of Glamorgan. Embracing culture and heritage is an objective of the plan and culture and heritage and the historic environment are clearly recognised throughout the Preferred Strategy and strategic policies. Further details and policies on protecting the historic environment will be contained within the Deposit Plan.</p> <p>The key housing sites have been Identified utilising a robust site assessment process in locations that are considered to be sustainable and accord with the principles of the Preferred Strategy.</p>	N/A

<p>The rural villages of the Vale should not be expanded to form mini towns.</p> <p>The character of small communities will be lost if they are all subsumed by an unrelented focus on development.</p> <p>Strategy will see large parts of the rural Vale no longer being rural.</p> <p>Impact on village identity.</p> <p>No evidence of need for development in rural locations.</p> <p>It will change the character of the area.</p>	<p>The strategy limits development in Minor Rural Settlements to small scale affordable housing led development at a scale proportionate to the size of the settlement.</p> <p>The key sites promoted in the strategy are in the larger primary settlements, service centre settlements and the key settlement of Barry. The key site at North East Barry is adjacent to the existing settlement boundary of Barry and is considered to be a functional extension to Barry, rather than a development in an isolated rural area.</p>	<p>N/A</p>
<p>The Preferred Strategy is flawed as it does not have a true vision of sustainable development at its heart. It is based on where developers wish to put forward land not considering place, transport or infrastructure.</p>	<p>PPW defines 'sustainable development' as <i>"the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals."</i></p> <p>The Preferred Strategy sets a Vision, objectives and policies aimed at balancing the economic, social, environmental and cultural well-being of the Vale. This means delivering homes, jobs and infrastructure whilst protecting the most important areas from a cultural and environmental perspective.</p> <p>The Preferred Strategy is supported by an Initial Integrated Sustainability Appraisal (ISA) which has reviewed the Preferred Strategy and concluded that for most key themes the plan would lead to positive effects. Where there is uncertainty or negative effects are identified the further detail that will be provided at Preferred Strategy stage will help address this.</p>	<p>N/A</p>

Strategy assumes that employees live close to employment, which is not the case.	It is recognised that not every resident of the Vale will live and work locally. However, the Strategy seeks to align jobs and homes so that there is the greatest possible opportunity for people to do this if they so choose or are able. The Strategy also locates new homes and jobs in places where alternative modes of travel other than the car are currently possible or will be possible in the future.	N/A
Some elements of the Preferred Strategy considered to be unrealistic.	Comments noted.	N/A
Impossible to comment.  Strategy is vague.	Comments noted, however, it is considered that the Strategy is explained and reasoned.	N/A
The PS perpetuates the desire to build on all the land south of the M4 and turn the Vale into Cardiff's principle affluent persons housing estate. This is evidenced in Figure 8 of BP20 where the Vale is shown as being part of 'Greater Cardiff'.	The RLDP seeks to deliver of mix of housing types, including a significant proportion of affordable housing, to meet a moderate housing requirement. It is inaccurate to say that the plan intends 'build on all the land south of the M4.'  BP20 Joint Position Statement with Cardiff includes a map taken from the ONS which shows Travel to Work Areas (TTWA) from the 2011 Census. This shows part of the Vale as being in the TTWA for Cardiff and part within the TTWA for Bridgend.	N/A

### **Conflict with policies and plans**

Conclusions inconsistent with legislation and evidence. Our team has identified in excess of 73 items where the conclusions of the PS, are at odds with what the supporting documents say, or with Planning Legislation. We	Comments noted. The spreadsheet listing the discrepancies between the supporting documents and the preferred Strategy will be assessed if submitted as part of the Deposit Plan consultation.	N/A
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<p>will provide our spreadsheet of these flaws in the process, and more, to the Inspector at Deposit Stage.</p>		
<p>The PS fails to address the five ways of working in the Well-being of Future Generations Act and explain how the Council intends to meet its obligations in this regard.</p>	<p>BP4 on the Assessment of the Preferred Strategy against the Tests of Soundness provides evidence of how the PS has had regard for the Well-being Goals. Reference to how the PS was prepared in accordance with 5 ways of working is included in Section 3 of the Council report of 20<sup>th</sup> November 2023.</p>	<p>In subsequent updates to BP4 include more explicit reference to how the RLDP has been prepared in accordance with the 5 ways of working.</p>
<p>The PS does not take account of the Well-being of Future Generations Act:</p> <ul style="list-style-type: none"> <li>• Long term – no long term planning for transport, schools and doctors</li> <li>• Prevent problems from getting worse – no mitigation for deprived areas such as St Athan</li> <li>• Integrated approach – need a mix of uses</li> <li>• Collaborative – the only collaboration has been with landowners and developers</li> <li>• Involvement – refusal to meet with Community Council (St Athan)</li> </ul>	<p>The RLDP is a plan for 15 years. As part of the evidence base, the long-term implications from transport, education and health are all in the process of being considered. The Deposit RLDP will be supported by evidence base documents on these matters.</p> <p>New development will deliver new affordable homes, which will help those in housing need, and will be supported by Section 106 contributions to mitigate the impact of development, which will be a benefit for other residents in the community.</p> <p>A mix of uses is a key part of placemaking.</p> <p>The Pre-Deposit Engagement Report (BP1) sets out who has been involved in the process. This has included several engagement events for Town and Community Councils.</p>	<p>N/A</p>
<p>Preferred Strategy does not correspond with other plans being proposed.</p>	<p>It is not clear which plans the representor feels the Preferred Strategy does not accord with. Section 2 of the Preferred Strategy sets out the policy background include key plans and policies that have informed the Strategy.</p>	<p>N/A</p>

**Key Element 1 Delivering a sustainable level of housing and employment growth to accord with the Vale’s position within the Cardiff Capital Region**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Support for this element of the strategy.	Support is welcomed.	N/A
It is not considered that the deliverability of the proposed alignment of residential, employment and infrastructure is proven.  It is not clear how the residential and employment opportunities are balanced so that commuting is reduced.	The alignment between employment and housing and the assumptions made on commuting can be found in the evidence base (BP7 Housing and Employment Growth Options, BP8 Demographic Evidence and BP12 Employment Land Study). An infrastructure plan will be prepared to provide further details on the infrastructure requirements in the Deposit Plan.	N/A

**Key Element 2 Aligning locations for new housing, employment, services and facilities to reduce the need to travel**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Support for this element of the strategy.	Support is welcomed.	N/A
There is still a need to direct a proportion of growth to smaller settlements outside the Strategic Growth Area.	The RLDP will seek to allocate small scale affordable housing led schemes in Minor Rural Settlements proportionate to their size. These will be required to have a minimum of 50% affordable housing. The location and number of these sites will be identified in the Deposit Plan.	N/A
Employment sites in the Vale are not accessible other than by car from Dinas Powys.	It is important to recognise that employment in the Vale isn’t just limited to the new allocations identified in the RLDP. There are a number of established business parks within the Vale and paragraph 6.15 also recognises that town centres offer a range of employment opportunities.	N/A



	With two train stations, Dinas Powys residents can access opportunities in the settlements served now and in the future by the Vale of Glamorgan line. There are also bus links to Barry and Llantwit Major.	
Commercial sites proposed do not exploit existing structure that is at present, underused. e.g. the empty units at St Athan.	Bro Tathan Enterprise Zone is identified as a major employment allocation in the Preferred Strategy, informed by the BP12 Employment Land Study, which considers that there will be a realistic likelihood of development on the site during the plan period.	N/A
No jobs available to reduce out commuting.	BP12 Employment Land Study has reviewed the land requirement for new jobs and sites available and has provided recommendations on which sites will realistically deliver new jobs over RLDP plan period. These sites have been identified in the Preferred Strategy.	N/A
It is inconsistent that additional employment is identified near Junction 34 but not housing land.	<p>The employment proposals at Junction 34 are associated with an existing employment use in the location, Renishaw, has planning permission for expansion and a business park which was determined in accordance with the policies of the adopted LDP. It is recognised that this site does not accord with some of the principles of the Preferred Strategy as it is poorly related to public transport, but the extant permission and existing business means that it is necessary for the RLDP to reflect this.</p> <p>The identification of housing sites in the area of Junction 34 of the M4 would not accord with the Preferred Strategy as the area has limited services, facilities and public transport.</p>	N/A
<p>The Strategy makes no provision for allocations in locations outside of the Strategic Growth Area, although these areas were considered appropriate in the adopted LDP and there is a strong record of delivery.</p> <p>The current strategy seeks to allocate more sites in locations which are</p>	<p>The fact that the adopted LDP allowed for growth in Minor Rural Settlements does not mean such a strategy continues to remain appropriate, particularly in light of significant changes to national planning and transport policy.</p> <p>While the Preferred Strategy does not include allocations within smaller settlements it is clear that small scale affordable housing led sites proportionate to the size of the settlement will be identified in the Deposit RLDP.</p>	N/A

<p>already well provided for in terms of rolled forward allocations and commitments, whilst making no provisions for locations that have a proven track record in delivering housing. It is clear that the strategy ignores deliverable locations and over burdens locations which not yielded to their full extent.</p>	<p>In determining the level of growth appropriate for a settlement, a range of factors have been considered including affordable housing need, position in the settlement hierarchy, rolled forward and committed sites and the availability of appropriate deliverable land. It is not the case that the strategy ignores deliverable locations, as the key housing site identified are all in locations that have delivered housing in recent years.</p>	
<p>The Preferred Strategy lacks direction with regards to accommodating sites for retail development.</p> <p>Need has already been established but this need is not accounted for.</p>	<p>Policy SP11 Retail Floorspace of the Preferred Strategy identifies that within the Vale of Glamorgan there is capacity for between 4,282 and 5,862 sqm net of convenience food retail floorspace and 432 sqm net and 679 sqm net of comparison floorspace over the Plan period i.e. to 2036. Spatially, the study identifies the potential need for additional convenience food retailing within the retail centres of Barry, Penarth and Llantwit Major which would lead to potential improvements in the vitality and viability of those centres. While the PS identifies additional capacity it also recognises that such provision should be provided with the existing town centres.</p> <p>Consideration will be given to the findings of BP13 Retail and Leisure Study and the suitability of potential locations for new retail provision as part of the Deposit Plan.</p>	<p>Consider the provision of additional retail development in the Deposit Plan.</p>

**Key Element 3 Focusing Development in locations that are well served by existing and proposed rail stations and in areas with good bus links**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Support for this element of the strategy.	Support is welcomed.	N/A
Objection to Strategy due to traffic congestion and road infrastructure	Key sites are located in places that are in sustainable locations, reducing the need to travel, and in places well served by existing and proposed public transport.	N/A

	New development will be required to facilitate improvements to the infrastructure and traffic impacts will be fully assessed through the strategic transport work.	
<p>How do you limited the need to travel in established communities?</p> <p>Some people need cars for their work e.g. care workers.</p> <p>Believing that people will choose to cycle, walk or use public transport over their own vehicles is unrealistic.</p>	<p>The strategy does not seek to stop the use of private vehicles, but rather to ensure that new development is built in sustainable locations where people can access services and facilities more locally, reducing the need to travel, and that where travel is needed, there are more sustainable options available.</p> <p>It is recognised that some people do need cars for work due to the nature of their employment.</p>	N/A
<p>The Vale suffers with congestion. The PS will make matters worse and does not provide any meaningful solution.</p> <p>Enhancements to public transport are not adequately set out.</p>	<p>Stage 1 of Strategic Transport Assessment (BP14) was published alongside the Preferred Strategy and considered the baseline highway operation and sustainable transport.</p> <p>A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan which will identify any mitigation that may be required to reduce the impact of additional traffic from the key sites.</p> <p>The Preferred Strategy includes reference to a number of measures aimed at enhancing public transport, such as the potential station at St Athan.</p>	Include an updated position on public transport improvements in the Deposit Plan.
<p>Extra traffic will increase pollution and increase carbon input.</p>	<p>The Preferred Strategy locates new homes and jobs in places where alternative modes of transport other than the private car are currently possible or will be possible in the future. By providing sustainable alternatives and encouraging people to utilise more sustainable modes of transport, it is targeted that traffic levels and hence emissions/pollution will be reduced.</p>	N/A
<p>Poor public transport</p>	<p>The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with Transport for Wales</p>	N/A

<p>Buses are not frequent enough.</p> <p>The Council have no control of public transport.</p> <p>Trains are overcrowded.</p> <p>Only one train an hour in Western Vale.</p> <p>Key sites aren't well related to public transport.</p> <p>Plans for sustainable travel are wishful thinking.</p>	<p>(TfW) in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme.</p> <p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.</p> <p>It is appreciated that trains travelling along the Vale of Glamorgan Line are currently well used during peak times. TFW have committed to introducing additional services at peak times and they will also be introducing new trains to the Line with increased capacity.</p> <p>The five key sites are within walking and cycling distance of at least one existing or potential station, as shown on TFW isochrone maps, and all are in areas served by regular bus services. The improvement to sustainable transport links will be required as part of the development.</p>	
<p>Some key sites rely on future public transport that has not been approved, which raises concerns about deliverability.</p> <p>At this time locations must be assessed as if without the rail facility.</p> <p>Sustainable transport provision is not currently available or guaranteed in the future, or proposed developments may not be close enough.</p>	<p>Where infrastructure is required as part of a scheme – for example active travel improvements – this will be specified in the Deposit Plan.</p> <p>The two key sites at St Athan are linked to the provision of a new station. The UK Government has recently announced that it will fund a business case to look at options for new station at St Athan. The allocation of additional housing will help support and underpin this business case.</p> <p>The RLDP is a plan to 2036 and given the above announcement it is considered appropriate to include the station as a realistic option.</p>	N/A
<p>Query how many people will cycle to work.</p>	<p>It is not possible to state how many people will cycle to work as ultimately this is a matter of personal choice, however, the Council is committed to delivering active travel infrastructure throughout the Vale of Glamorgan as identified on the Active Travel Network Maps which will provide people</p>	N/A

	with the necessary infrastructure should they wish to utilise more sustainable modes of transport.	
Key junctions are at capacity and would be affected by further development.	Stage 2 of the Strategic Transport Assessment (STA) will consider junction capacities utilising Transport for Wales's revised Southeast Wales Transport Model. The STA will consider any necessary mitigation required, having regard also for modal shift.	N/A
The strategy is not being applied in St Athan as the area is currently poorly served by public transport.  No certainty that a station will be delivered in St Athan.	The UK Government has recently announced that it will fund a business case to look at options for new station at St Athan. The allocation of additional housing will help support and underpin this business case.  St Athan is also well related to two significant employment allocations at Bro Tathan and Aberthaw, which will offer opportunities for local employment, reducing the need to travel.	N/A
The delivery of a railway station at St Athan will further enhance the settlement's sustainability and connectivity and the delivery of additional development will add to the critical mass that makes the delivery of a railway station at St Athan viable.	Noted. The allocation of two sites at St Athan will significantly contribute to the business case for a new station.	N/A
Basing the strategy on existing key settlements and the railway line is sound, but fails to recognise the constraints on rail travel and the large numbers of people for whom access to stations on foot is unrealistic. Lack of car parking at stations is insufficiently recognised.	The key sites are allocated in reasonable walking and cycling distance location of existing or potential stations. It is accepted that not everyone will access stations by foot or bike and in those circumstances car parking is available in each of the settlements on the Vale of Glamorgan Line. The master planning of key sites will include the provision of active travel routes to stations and services and facilities.	N/A

<p>Strategy does not go far enough in addressing active travel needs. Active travel connections would need to be built before housing is built and occupied.</p> <p>Placemaking can only be achieved with reduced car dependency.</p> <p>Promotion of ebikes can help people switch from private cars.</p>	<p>New development will offer the opportunity to deliver a number of active travel routes. The phasing of the delivery of the active travel routes will need to be considered on a site-specific basis.</p> <p>It is agreed that reduced car dependency is a key element of placemaking and this is specifically referenced in Policy SP5 on Placemaking.</p> <p>It is recognised that e-bikes have a role to play in supporting the transition to more sustainable forms of transport. This is encompassed under the wider umbrella of cycling.</p>	<p>N/A</p>
<p>Eastbrook station is not accessible for all.</p> <p>Poor active travel routes – Ash Path has no lighting and the Biglas to Dinas Powys route has not progressed.</p>	<p>It is acknowledged that accessibility at Eastbrook Train Station itself is poor given the absence of a lift. As the station is managed by Transport for Wales this would be their responsibility. However, this does not undermine the fact that this is a station in close proximity to the site that will offer an alternative to journeys by car for some residents.</p> <p>The Ash Path has been identified as a route for improvement on the Active Travel Network Map. Barriers along the route were removed in 2022 and has provided easier access for wheelchairs and pushchairs. To bring to active travel standard would require land purchase. The route is well used by pupils attending St Cyres who traverse during daylight hours, as well as commuters/residents. The lighting of the Ash Path will not likely be progressed until the route can meet Welsh Government Active Travel standard.</p> <p>The Council will be publicly consulting on the proposed active travel route from Barry to Dinas Powys in the summer of 2024. Over the last 12 months the preferred route, as chosen by public consultation in 2022, has been subject to detailed ecology surveys and has involved flood modelling and consultation with Natural Resources Wales, to understand the impact of any proposal. It is envisaged that the survey and modelling work will return a favourable result and once the detailed design is completed, a construction funding application will be made to Welsh Government.</p>	<p>N/A</p>

<p>The RLDP should actively support more rural bus-based transport.</p> <p>New allocations in Pendoylan and Peterston could fund increased frequency of bus services.</p>	<p>It is recognised that new developments would be required to make a contribution towards sustainable transport, which could be used to support existing bus services or community transport services such as Greenlinks.</p> <p>Notwithstanding this, it is unlikely that the level of contributions required would be sufficient to fund a bus service with sufficient frequency to fundamentally change how the site is viewed in sustainability terms.</p>	N/A
<p>Cross boundary transport has not been full considered. Significant change to transport will occur in the area due to the Plasdwr development.</p>	<p>The Plasdwr development is located in the Pentrebanne/Radyr area of Cardiff. Access to the Vale from this site is via country lanes with no footways. It is unrealistic to assume that this development will improve public transport in the Vale. However, the strategic transport work will consider wider traffic impacts affecting the RLDP holistically.</p>	N/A
<p>The Strategy mentions that some employment sites are poorly served by sustainable transport. There needs to be a plan to create active travel routes and possibly condition the use of the site.</p>	<p>The Council's Active Travel Network Map identifies a number of future improvements to major employment sites, including improved links between Cardiff Airport Enterprise Zone and Barry and between Bro Tathan, St Athan and Rhoose.</p>	N/A
<p>There are excellent bus corridors along the A48 and A4050. Some bus corridor-based allocations would strengthen the strategy rather than focusing on a rail related solution that has risk to delivery.</p>	<p>Whilst buses do make an important contribution towards the delivery of the strategy, bus services alone cannot deliver the frequency and capacity of public transport that the rail network can deliver.</p>	N/A

#### **Key Element 4 - Affordable Housing Led Sites**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
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<p>Support if these are Council or private led schemes.</p> <p>Affordable housing needs to be priority. Large scale developments cannot cater for the housing needs of the Vale as it gives developers too much scope to change percentages of affordable housing on sites.</p> <p>Pockets of smaller social/affordable housing developments would be much more fitting and accepted into communities</p>	<p>Support is welcomed.</p> <p>The delivery of affordable housing is a key element of the strategy. A high level viability assessment will be undertaken to support policies included within the Deposit RLDP. Site specific viability assessments will be undertaken for the key sites and the Section 106 requirements for the site will be set out clearly within the Deposit RLDP. There will an expectation that these requirements will be delivered.</p> <p>Given the scale of affordable housing need in the Vale, all options for delivery should be considered and the RLDP will incorporate a mix of Section 106 affordable housing on key sites, and small-scale affordable housing led sites.</p>	<p>N/A</p>
<p>Amend key element 4 to read “allowing for small scale affordable housing development <del>in</del> <b>at</b> settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement.”</p> <p>Paragraphs 6.23 and 6.24 should also be amended to refer to <b>at</b> rather than ‘within’</p>	<p>It is the intention to include any affordable housing led site allocation within the settlement boundary of the settlement, which may require the consequential amendment of the settlement boundary. As such, these sites will be ‘in’ the settlement and the wording should be retained accordingly.</p>	<p>N/A</p>
<p>Affordable housing is needed but more so in key towns e.g. Barry and Bridgend.</p>	<p>Whilst it is agreed that the latest LHMA shows the greatest affordable housing need is in Barry, need has been identified in all housing market areas in the Vale. Affordable Housing provision within Bridgend will be determined by Bridgend County Borough Council.</p>	<p>N/A</p>
<p>The greatest affordable housing needs are stated to be in Barry and Penarth. Allocations have been made in those towns to deliver some of this need. The RLDP could include a Policy stating that a proportion of the overall</p>	<p>Whilst it is agreed that the latest LHMA shows the greatest affordable housing need is in Barry, and also Penarth/Llandough, affordable housing need has been identified in all housing market areas in the Vale.</p> <p>The approach suggested would also be contrary to Technical Advice Note 2: Planning for Affordable Housing, which states “<i>the strong presumption is</i></p>	<p>N/A</p>



affordable housing requirements on other RLDP allocations could be settled financially, with the money then being spent on affordable housing schemes in the two areas of greatest need.	<i>that affordable housing secured through planning obligations will be provided on the application site so that it contributes to the development of socially mixed communities”.</i>	
50% affordable housing is not considered appropriate. This will need to be evidenced by viability testing to ensure that it is deliverable.	A high level viability assessment will be undertaken to support policies included within the Deposit RLDP.	N/A
Greater flexibility should be introduced to this to allow greater scope for sites adjacent to adjoining to well-related to existing settlements.	It is the intention to include any affordable housing led site allocation within the settlement boundary of the settlement, which may require the consequential amendment of the settlement boundary. As such, these sites will be ‘in’ the settlement and the wording should be retained accordingly.	N/A

#### **Key Element 5 – Supporting the role of Cardiff Airport**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
If you wish to prioritise Bro Tathan Enterprise Zone, Cardiff Airport and Aberthaw as important employment areas then build homes near them.	The RLDP already makes provision for homes on two key sites in St Athan.	N/A
Need for a direct fast bus service from Cardiff Airport to Cardiff for passengers and locals to use.	This is not a matter that the RLDP can address.	N/A
Cardiff airport needs a good link road before it can become successful.	Previous proposals for a road link between the M4 and the A48 have been considered but in accordance with Cabinet decision C536 the scheme was not progressed. The proposal would not accord with the Wales Transport Strategy and would have implications for the climate change agenda.	N/A
Objection to key element 5 as Cardiff airport is unlikely to be viable.	This is not a matter that the RLDP can fundamentally address, however, the Enterprise Zone will potentially strengthen and support the viability of the airport.	N/A

<p>Focus on links with Cardiff Airport within the strategy – contradicts entirely with climate crisis.</p>	<p>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.</p> <p>Paragraph 6.30 of the Preferred Strategy states “<i>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 Welsh-based passengers the opportunity to fly from closer to home, reducing journeys for those that may have otherwise been made outside of Wales. WG is working with the UK Government and the Jet Zero initiative, as well as with Cardiff Airport, to reduce the environmental impacts of aviation.</i>”</p>	<p>N/A</p>
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**Key Element 6 - Allow for Regeneration Opportunities, including at Aberthaw and Barry Docks**

Issue raised	Council response	Action
<p>There needs to be more discussion on proposals at Aberthaw with councillors and communities.</p>	<p>This project is being led by CCR Energy and is it understood that engagement with local communities will be a key part in the overall development of the Masterplan.</p>	<p>N/A</p>
<p>Support for development at Aberthaw and Barry Docks.</p>	<p>Support is welcomed.</p>	<p>N/A</p>

**Biodiversity**

Issue raised	Council response	Action
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<p>Impact on nature and ecology.</p> <p>The PS is at odds with WG's aspirations regarding biodiversity. Instead of enhancing biodiversity, as is required by planning policy, the Council are proposing to destroy it.</p>	<p>In accordance with national planning policy, new development will be required to deliver a local net biodiversity benefit. Further information on the options for achieving this will be set out in the Deposit RLDP.</p>	<p>Include further detail on achieving biodiversity net benefit in the Deposit RLDP.</p>
<p>Wellbeing is improved by being in nature. Removing large pockets of land for more housing developments further reduces people's access to healthy spaces.</p>	<p>Many of the key sites in the plan are privately owned farmland with limited access. Notwithstanding the wellbeing benefits for future users associated with homeownership, the development of sites for housing will increase public access to these sites, and also provide access to more formal open spaces and green infrastructure. Through designing high quality areas of public open space the opportunity also exists to create restorative places that will provide benefits to mental wellbeing as well.</p>	<p>N/A</p>

### **Flooding**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Objection due to flooding</p> <p>The PS provides no solutions to the flooding problems likely to be exacerbated by climate change.</p>	<p>Sites identified within the RLDP will need to demonstrate that they accord with national planning policy on flood risk by directing development away from areas prone to flood risk and ensuring that any development does not increase the risk of flooding elsewhere. Discussions will continue to take place with key stakeholders to ensure that allocations within the RLDP comply with national planning policy.</p>	<p>N/A</p>

### **Services and facilities**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>School capacity, health services, leisure and cultural opportunities are not enhanced by the PS.</p> <p>The PS fails to link services to the needs of older people and how services and infrastructure will flex to meet the needs of that group.</p> <p>Negative impact on infrastructure and services (schools, doctors, dentists, shops, pubs).</p> <p>New housing is likely to dilute the poor services presently experienced.</p>	<p>The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly.</p> <p>The Council are liaising with Cardiff and the Vale University Health Board to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, CAVUHB will be able to plan for future service requirements and plan accordingly.</p> <p>The increase in population associated with new development will increase the potential customer base in an area and may be seen as a benefit to shops and pubs.</p>	<p>The Deposit Plan will be supported by a background paper which considered the impact of new development on school capacity and how this can be addressed.</p>

### **Development on Greenfield and Best and Most Versatile (BMV) Land**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The allocation of greenfield sites is a contradiction of the stated themes and objectives.</p> <p>Development on greenfield sites is contrary to PPW.</p>	<p>The Preferred Strategy and its supporting evidence base recognises that utilising brownfield land before greenfield sites in the first instance is key, but also that there is insufficient appropriate brownfield land available to deliver a brownfield only strategy. As such, there is a need to allocate greenfield sites.</p>	<p>N/A</p>

<p>Greenfield sites are being developed when adequate brownfield land is available in other places.</p> <p>Some of the sites proposed are BMV Land.</p> <p>The key characteristics suggest that open countryside and productive farmland should be protected and not built on.</p> <p>Conflicts with a 'Healthier Wales'</p>	<p>The objectives of the plan can be delivered on greenfield sites as the key sites chosen predominately comprise improved agricultural land which has low ecological value and offers real opportunities for the development to provide a local net biodiversity benefit. The sites selected are in locations that are or can be accessible by a choice of transport modes and in locations that reduce the need to travel. Furthermore, the sites would meet the objectives of delivering 'Homes For All' and 'Placemaking.'</p> <p>As explained in BP23 Best and Most Versatile Agricultural Land, two of the residential-led key site allocations contain small areas of BMV – less than 10% of the total site area in both cases. Further ALC survey work will support the Deposit RLDP if necessary.</p>	
<p>We will never regain greenfield sites if they are developed.</p> <p>There is a climate emergency.</p>	<p>The Preferred Strategy and its supporting evidence base recognise that utilising brownfield land before greenfield sites in the first instance is key, but also that there is insufficient appropriate brownfield land available to deliver a brownfield only strategy. As such, there is a need to allocate greenfield sites.</p> <p>The Preferred Strategy recognises there is a climate emergency in the Vision, Objectives and strategic policy framework.</p>	N/A
<p>The Preferred Strategy would result in a loss of green belt.</p>	<p>None of the Vale is identified as green belt land, which is a specific planning designation designed for the long-term protection of land. Future Wales sets out the need for the Strategic Development Plan to identify a green belt in the Cardiff Capital Region, however the potential area does not include land in the Vale.</p>	N/A

## SP1 Growth Strategy

### General Support for Policy SP1

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
General support.	Support is welcomed.	N/A
Support for the identification of Cowbridge as one of the seven settlements where growth is to be concentrated, as well as its inclusion within the Strategic Growth Area.	Support is welcomed.	N/A
Support for Policy SP1 and its reference to the employment land requirement of 67.8ha, as well as reference to new development being focused on existing major and locally important employment sites.	Support is welcomed.	N/A

### Objections to Policy SP1

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Objection to growth strategy due to lack of infrastructure and services.	<p>The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly.</p> <p>The Council are liaising with Cardiff and the Vale University Health Board to understand the implications of the Replacement LDP. This includes a</p>	N/A

	consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, CAVUHB will be able to plan for future service requirements and plan accordingly.	
We should be trying to add growth within existing settlement boundaries with the settlements listed, not on adjacent greenfield sites.	There is insufficient land within the existing settlement boundaries to accommodate the level of growth required to be compliant with Future Wales.	N/A
Do not agree due to conflicting definitions as to how Dinas Powys is defined.	The reference to Dinas Powys in Policy SP1 is that it is one of a number of a settlements where growth will be concentrated. The role of Dinas Powys as a primary settlement in the Strategic Growth Area is consistent throughout the plan.	N/A
<p>Policy SP1 currently states “<i>In rural areas, additional growth will be permitted within existing settlement boundaries and on affordable housing led schemes in sustainable locations</i>”. As discussed above, the word ‘within’ should be replaced with ‘AT’ to accord with PPW and to ensure that sufficient affordable housing sites to meet needs can come forward.</p> <p>In addition, the reference to ‘in sustainable locations’ should be removed or amended. The wording is currently imprecise, and it is not clear what it meant by a ‘sustainable location’? It is inevitable that most rural areas will not be sustainable locations with regard to access to a range of facilities and the ability to walk and cycle to these facilities. The PS should recognise that reality and plan</p>	<p>It is the intention to include any affordable housing led site allocation within the settlement boundary of the settlement, which may require the consequential amendment of the settlement boundary. As such, these sites will be ‘in’ the settlement and the wording should be retained accordingly.</p> <p>The comment about defining what is meant by sustainable locations is noted and further clarification should be provided in the Policy and/or supporting text.</p>	Define what is meant by a sustainable location in the context of affordable housing led schemes in Policy SP1 and/or supporting text.

<p>positively for rural communities and their needs.</p>		
<p>Primary Settlements outside of the Strategic Growth Area need to be specifically named in Policy SP1.</p> <p>The number of homes that is permissible (and allocated for housing) in these settlements increased from the 50 home limit that is set in Policy SP2.</p> <p>The wording of Policy SP1 (Growth Strategy) fails to distinguish between the Primary Settlements and the Minor Rural Settlements. The wording of Policy SP1 needs to be amended to include a specific reference to the role that the other Primary Settlements outside of the Strategic Growth Areas can play in providing land for new homes.</p>	<p>The Primary Settlements outside the Strategic Growth Area, the primary settlements and the Minor Rural Settlements are already referenced in Policy SP2. It is considered unnecessary to repeat this in Policy SP1.</p> <p>In primary settlements outside of the Strategic Growth Area it is considered that a maximum number of dwellings of 50 is considered to be a scale proportionate to the size of the settlement.</p>	<p>N/A</p>
<p>The strategic policy fails miserably to identify how the implementation will be financed and implemented in a way that fits with climate emergency and biodiversity issues.</p>	<p>The Preferred Strategy must be read as a whole. Whilst Policy SP1 on the Preferred Strategy does not specifically reference biodiversity or climate change, these are covered extensively in other policies.</p> <p>Further evidence on viability and deliverability will be provided at Deposit Stage.</p>	<p>N/A</p>
<p>Sully, whilst within the Strategic Growth Area, is not one of these identified seven settlements. It instead, alongside Llandough which is effectively considered as part of Penarth, appears to be the only Key Settlement, Service Centre Settlement, or Primary</p>	<p>Both Sully and Llandough are identified as Primary Settlements within the Strategic Growth Area and in principle new development would accord with the strategy. The Preferred Strategy includes the rolled forward site at Swanbridge Road in Sully, which will be built out over the next few years, and the Land South of Llandough Hill in Llandough, which has planning permission subject to the signing of a Section 106 agreement. These sites will deliver growth in their respective settlements over the plan period.</p>	<p>Add Llandough and Sully to the list of sites that growth will be concentrated in within Policy SP1.</p>



<p>Settlement within the Strategic Growth Area which is not one of the named settlements.</p> <p>There is no indication that there will be any growth in the settlement outside of existing allocations and beyond the settlement limits. This is completely at odds with Sully's location within the Strategic Growth Area. Sully should be listed as one of the settlements where growth should be focussed and, reflecting this, land should be allocated within the settlement.</p>	<p>Both settlements are within good cycling distance of a station (Llandough is 5-10 minutes of Cogan station and Sully is 10-15 of Cadoxton station). Both settlements are also well served by frequent buses. As such it would be appropriate to add them to the list of settlements that will deliver housing growth.</p>	
<p>It is requested that Wenvoe and Peterston Super Ely are added to the list in SP1 (and Peterston super Ely recategorized as a Primary Settlement). Both these settlements have existing good public transport routes which are bus based and comply with the definition of the public transport corridor.</p>	<p>Wenvoe and Peterston Super Ely have been excluded from the Strategic Growth Area as they are not served by existing or proposed rail links and do not have the range of services within them that would reduce the need for residents to travel. They have not therefore been included in the list of settlements in SP1.</p> <p>The Strategic Growth Area follows the main population centres. The area outside the strategic growth is more rural in character and settlements are generally less sustainable.</p>	N/A
<p>Having affordable housing led schemes in rural areas may not be appropriate. These are not the areas of identified need in the Vale and putting affordable housing in areas with little or no public transport could disadvantage potential new residents of those development.</p>	<p>Affordable housing led schemes will only be acceptable in appropriate Minor Rural Settlements. Paragraph 6.53 of the Preferred Strategy states <i>"in considering the scale of affordable housing need proposed, the Council will take account of the suitability of the proposal in relation to exiting services and facilities, availability of public transport and the impact the proposal would have on character and setting of the village."</i></p>	N/A

	There is evidence of need across all housing market areas in the Vale, as shown in the latest LHMA.	
<p>The Strategic Growth Area does not allocate housing toward the rural Vale, which is considered deficient.</p> <p>The strategy ignores the potential for rural home working. Lack of sustainable transport is not a justification as a large proportion of people working do not commute for work.</p>	<p>Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with re-use of existing buildings and infill opportunities.</p> <p>Whilst it is acknowledged that there has been an increase in people working from home at least part of the time, commuting is not the only reason for journeys and therefore the principles behind focusing development in areas well served by public transport remains valid.</p>	N/A
<p>Policy SP1 of the Preferred Strategy sets out the intended growth strategy for the Authority, stating that the LPA should be aspiring to achieve a “minimum of 2,000 affordable homes”. This is significantly below the identified requirement.</p> <p>The LPA should consequently be exploring more positive approaches to maximise the delivery of affordable homes from all sources, including small affordable sites within and adjacent to settlement boundaries.</p>	<p>The affordable housing target will be reviewed as part of the preparation of the Deposit RLDP to consider all contributions for the delivery of housing through the planning system. This will include potential section 106 contributions, including those on affordable housing led sites, and the potential contribution from rural exceptions sites. Policy SP2 Settlement Hierarchy identifies where additional affordable housing need will be considered.</p>	N/A

**General Comments**

Issue raised	Council response	Action
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<p>The impact on our infrastructure will be dependent on the amount of growth and its spatial distribution. development should be located so that it can be well serviced by existing or planned infrastructure where possible.</p> <p>The impact of development on our Wastewater Treatment Works (WwTWs) will be dependent on the amount of growth within their catchment areas. Once further information is available regarding the breakdown of growth between settlements, we can assess the potential impact upon our assets. Where the total growth identified by proposed allocations exceeds the theoretical design capacity of the WwTWs then improvements to provide further capacity will be required during the LDP period.</p> <p>Once sites are identified we will be able to advise whether there is sufficient capacity within the water and sewerage networks to accommodate the growth proposed. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewer, particularly for strategic development sites, and developers would be expected to fund investigations during pre-planning stages. The findings of a hydraulic</p>	<p>Comments are noted. Site specific comments have been provided for the key and rolled forward sites, but there may be additional sites allocated in the Deposit Plan which need to be assessed cumulatively.</p>	<p>Liaise with DCWW on the full list of allocations as part of the evidence base for the Deposit Plan.</p>
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<p>modelling assessment would identify the extent of any necessary reinforcement to the network which can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).</p> <p>We are currently delivering the AMP7 programme which covers our capital investment for the period 2020-25, this will be followed by AMP8 for 2025-2030, and AMP9 for 2030-35. The VOG Replacement LDP has a timeframe that runs until 2036 therefore any infrastructure investment required can be considered for delivery in future AMPs. Where specific infrastructure improvements are required to allow a development site to proceed, but where there are no current plans to invest through the AMP, there are provisions available for developers to make financial contributions, via planning obligations.</p>		
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**SP2 Settlement Hierarchy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Support for the settlement hierarchy.	Support is welcomed.	N/A
There is no issue with the hierarchy for smaller settlements but there are	Comment is noted.	N/A

concerns with the way housing growth is planned for these communities.		
Agree with the proposed settlement hierarchy in terms of Dinas Powys and larger settlements and the protection of the surrounding countryside.  Dinas Powys a sustainable location where appropriate growth can be apportioned.	Support is welcomed.	N/A
The classification of Dinas Powys as a larger town in the opening of the document is a fallacy.  It does not offer the category of roles that a service centre would do.  There is no range of local employment opportunities.	Comment noted. This has been considered in Section 3, where it was proposed to amend para 3.3 to refer to larger towns and villages, recognising that Dinas Powys is one of the larger villages within the Vale of Glamorgan.	Amend para 3.3 to refer to larger towns and villages.
Regard should be given to the lack of amenities and facilities in Llandough to support any further residential development.	BP5 Settlement Appraisal Review has assessed the sustainability of Llandough as a settlement and the Preferred Strategy retains its status as a primary settlement. It is also located in the Strategic Growth Area so in principle would be acceptable for further residential development.	N/A
The continued identification of St Athan as a Primary Settlement is supported	Support is welcomed.	N/A
St Athan is a village not a town.  St Athan has no primary infrastructure and no good public transport links	St Athan is referred to as a 'primary settlement' in the settlement hierarchy, not as a town.  The comments on infrastructure and public transport are noted.	N/A

<p>It is confusing that the Preferred Strategy talks about Service Centres and Primary Settlements etc, yet other policies talk about Towns (for Placemaking).</p>	<p>The concern is noted.</p> <p>Placemaking Plans are referenced in paragraph 2.83 where it is stated that they will be prepared for the four towns within the Vale. It is important that there is consistency between Placemaking Plans and proposals identified in the adopted LDP and emerging RLDP. However, Placemaking Plans have a wider remit than land use planning matters, covering the other things such as events, activities within places and social well-being.</p>	<p>N/A</p>
<p>The policy has not taken into account the current and future housing needs and requirements at Colwinstone. There is a need for open market housing.</p>	<p>In settlements where appropriate small scales sites for affordable housing led developments are proposed, the minimum requirement would be 50% affordable housing. This could allow for up to 50% of the site to come forward for open market housing. Within Minor Rural Settlements such as Colwinston, there will also be opportunities for infill development and the re-use of existing buildings where appropriate.</p>	<p>N/A</p>
<p>Support for the identification of Rhoose as a Primary Settlement.</p> <p>The primary settlements, and Rhoose in particular, are capable of accommodating a higher level of growth given the constraints surrounding the service centre settlements of Cowbridge, Llantwit Major and Penarth.</p>	<p>Support is welcomed.</p>	<p>N/A</p>
<p>Rhoose is identified as a "primary settlement" which offers "several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs". This is not true. Rhoose does not cater for the</p>	<p>BP5 Settlement Appraisal Review evidences why Rhoose has been classified as a primary settlement. Rhoose will cater for the needs of nearby Minor Rural Settlements as it has two primary schools which serve a catchment larger than the Rhoose itself and will result in linked trips. It also has a station which can be used by a wider than Rhoose catchment.</p>	<p>N/A</p>

<p>needs of Minor Rural Settlements – they travel to Barry or Llantwit Major.</p> <p>Rhoose is referred to as both a primary settlement and a village.</p>	<p>Rhoose is a primary settlement for the purposes of the settlement hierarchy. There is a reference to a ‘village centre’ in the context of Policy SP10 on retail, commercial and service centres.</p>	
<p>Policy SP2 should be amended to replace the word ‘within’ should be replaced with ‘AT’</p> <p>It is suggested that the acceptability of small affordable housing sites up to 25 units is extended to smaller settlements as well as the Minor Rural Settlements.</p>	<p>It is the intention to include any affordable housing led site allocation within the settlement boundary of the settlement, which may require the consequential amendment of the settlement boundary. As such, these sites will be ‘in’ the settlement and the wording should be retained accordingly.</p> <p>The tier of settlements below Minor Rural Settlements in the settlement hierarchy is hamlets and smaller rural settlements. These services have few services and facilities and are not considered sustainable locations for new development.</p>	N/A
<p>Support the identification of Wick as a primary settlement but note the strategy would mean it would accommodate less development than as an LDP Minor Rural Settlement.</p>	<p>Support is welcomed.</p> <p>It is correct that Wick’s position outside of the Strategic Growth Area will mean that new development would be limited to small scale affordable housing led developments if appropriate sites are identified and infill opportunities or reuse of existing buildings. This is a result of the change in strategy to reflect a focus on directing development to locations best served by public transport.</p>	N/A
<p>Support the identification of Sully and a Primary settlement and inclusion within the Strategic Growth Area.</p> <p>The strategy fails to consider the inherent sustainability of certain settlements, such as Sully, which are not located along the Vale of Glamorgan and Penarth Branch Lines but are sustainable locations that are</p>	<p>Support is welcomed.</p> <p>Sully is identified as a Primary Settlement within the Strategic Growth Area and in principle new development would accord with the strategy. The Preferred Strategy includes the rolled forward site at Swanbridge Road, which will be built out over the next few years.</p>	N/A

appropriate for development nonetheless. It is considered that Sully can accommodate development.		
Sully provides little for its residents.	Comment noted.	N/A
Support for the identification of Peterston Super Ely as a Minor Rural Settlement.  The Settlement Appraisal Review should be updated to take account of services and facilities in the neighbouring authority of Cardiff.	Support is welcomed. The Settlement Appraisal Review considers the settlements of the Vale of Glamorgan and the services and facilities that they provide that can be accessed sustainably.	N/A
Include Peterston super Ely as a Primary Settlement due to its many services and facilities and service centre role in the north of the Local Authority.	The settlement hierarchy is informed by the BP5 Settlements Appraisal review. There are a range of settlements within each tier of the settlement hierarchy and whilst Peterston Super Ely scores relatively highly when considered against other settlements in the same tier, it does not have the level of daily facilities, key facilities, proximity to employment opportunities or frequency of public transport that those settlement designated as primary settlements have and therefore its status as a Minor Rural Settlement is justified.	N/A
The assessment does not recognise the massive growth of Rhoose (6782), Sully and Lavernock (4699) and St Athan (4167) which have larger populations that Cowbridge (3645) but lack facilities.	BP5 Settlements Appraisal Review considers the existing population of settlements as of 2022 and this has helped inform the settlement hierarchy.	N/A
Support the identification of Wenvoe as a primary settlement.	Support is welcomed.	N/A
Support for Cowbridge as a service centre and growth area.	Support is welcomed.	N/A



<p>Cowbridge, Wenvoe and Peterston have capacity to accommodate new housing growth. Each settlement has good facilities, an existing well used bus service, schools, shops, and other community facilities that could be strengthened by new development.</p>	<p>Cowbridge is identified as a service centre settlement in the strategic growth area and is delivering new housing growth on the land at Darren Farm to the west of the town. The Plan is also rolling forward land at St Athan Road, which is subject to a current planning application.</p> <p>Both Wenvoe and Peterston Super Ely are located outside the strategic growth area but could potentially deliver affordable housing led growth.</p>	<p>N/A</p>
<p>Support for Barry's position as a key settlement and further sustainable development here, particularly that which will complement and support the ongoing re-development of Barry Waterfront.</p> <p>Barry is one of the most sustainable locations within which to focus major new development opportunities</p>	<p>Support is welcomed.</p>	<p>N/A</p>
<p>Ewenny is categorised as a Minor Rural Settlement. It is not considered appropriate to only allocate sites in the Strategic Growth Area.</p>	<p>Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with re-use of existing buildings and infill opportunities.</p>	<p>N/A</p>
<p>St Nicholas is one of the few Minor Rural Settlements which includes a school within the village. Its strategic position with accessibility to public transport provision and bus services lend support to it being considered further up the Settlement Hierarchy as a Primary Settlement.</p>	<p>The settlement hierarchy is informed by the BP5 Settlements Appraisal review. There are a range of settlements within each tier of the settlement hierarchy and whilst St Nicholas scores relatively highly when considered against other settlements in the same tier, it does not have the level of daily facilities, key facilities or proximity to employment opportunities that those settlement designated as primary settlements have and therefore its status as a Minor Rural Settlement is justified.</p>	<p>N/A</p>
<p>Support for the identification of St Nicholas as a Minor Rural Settlement.</p>	<p>Support is welcomed.</p>	<p>N/A</p>

<p>Growth should be prioritised in suitable Minor Rural Settlements such as St Nicholas which represents a suitable location to Cardiff which is inherently well connected by the existing road networks and other modes of public transport.</p>		
<p>Policy SP2 identifies Southerndown under the category of 'Hamlets and Smaller Rural Settlements' which lies outside of the Strategic Growth Area. Whilst Southerndown is no longer designated as a 'Minor Rural' settlement, it is considered that it should be, as was the case in the previous LDP.</p>	<p>As detailed in BP5 Settlements Appraisal Review, Southerndown scores poorly in respect of the assessment principles of public transport, availability of key services and daily facilities and proximity to employment opportunities, with residents needing to travel to meet almost all of their needs. It scores much lower than other areas that are classed as Minor Rural Settlements and can no longer be justified within this category.</p>	<p>N/A</p>
<p>Policy SP2 identifies Bonvilston as a 'Minor Rural Settlement' which lies outside of the Strategic Growth Area. Given this, the current Preferred Strategy does not provide for any growth in the settlement by default, although it is noted that schemes providing at least 50% affordable housing will be considered in Minor Rural Settlements</p>	<p>Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with re-use of existing buildings and infill opportunities.</p>	<p>N/A</p>
<p>Aberthaw East should not be classed as a Minor Rural Settlement, in the same category as other settlements which are more rural in nature and further from the Key and Primary Settlements. Given its location and links between two primary settlements, good transport links via bus and proximity to</p>	<p>Policy SP2 identifies Aberthaw (East) as being a Minor Rural Settlement in the Strategic Growth Area. It is recognised that this conflicts with the key diagram, which shows the settlement as being within the Strategic Growth Area due to the way that the Strategic Growth Area has been drawn loosely around existing settlements. This is an error in the key diagram as Aberthaw (East) has limited services and facilities and is not a location where significant additional growth should be targeted. The Strategic Growth Area as shown on the key diagram should be amended.</p>	<p>Amend the strategic growth area boundary on the key diagram to draw it more tightly to the existing settlements,</p>

<p>the Employment Regeneration Opportunity Area</p> <p>The Strategy clearly indicates that Aberthaw East is located within the Strategic Growth Area. This also sets it apart from other Minor Rural Settlements.</p> <p>As a result, it could be appropriate for Aberthaw East to be named under a 'new' Settlement subheading such as 'Minor Settlement', removing the term 'rural' to account for its location within the Strategic Growth Area and proximity to primary settlements.</p>		<p>excluding Aberthaw (East).</p>
<p>Policy SP2 identifies Ogmere By Sea as a 'Minor Rural Settlement' which lies outside of the Strategic Growth Area. Given this, the current Preferred Strategy does not provide for any growth in the settlement by default, although it is noted that schemes providing at least 50% affordable housing will be considered in Minor Rural Settlements</p>	<p>Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with re-use of existing buildings and infill opportunities.</p>	<p>N/A</p>
<p>Policy SP2 identifies Treoes as a 'Minor Rural Settlement' which lies outside of the Strategic Growth Area. Given this, the current Preferred Strategy does not provide for any growth in the settlement by default, although it is noted that schemes providing at least 50% affordable housing will be considered in Minor Rural Settlements.</p>	<p>Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with re-use of existing buildings and infill opportunities.</p>	<p>N/A</p>

<p>Policy SP2 identifies Ystradowen as a 'Minor Rural Settlement' which lies outside of the Strategic Growth Area. Given this, the current Preferred Strategy does not provide for any growth in the settlement by default, although it is noted that schemes providing at least 50% affordable housing will be considered in Minor Rural Settlements</p>	<p>Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with re-use of existing buildings and infill opportunities.</p>	<p>N/A</p>
<p>Minor Rural Settlements dispersed throughout the 'Connectivity' corridor, such as Llandow, should play a supporting role in housing growth, given their important range of services and facilities that reduce the need to travel.</p>	<p>Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available, together with re-use of existing buildings and infill opportunities.</p> <p>In respect of Llandow, BP5 Settlements Appraisal Review identifies that there are few services and facilities within the existing Minor Rural Settlement of Llandow to serve local needs and development in this area would not reduce the need to travel. Significant new development would therefore not be appropriate.</p>	<p>N/A</p>
<p>The list of settlements included is not considered an exhaustive list of potential locations for development. Excluded from this, for example, is Eglwys Brewis, a settlement comparable in size to St Athan, and within walking distance of the services and infrastructure of the Primary Settlement.</p>	<p>As set out in BP5 Settlements Appraisal Review, the settlement area of St Athan is considered to include Eglwys Brewis, together with Picketston, RAF East Camp and RAF West Camp.</p>	<p>N/A</p>
<p>Tiers of the settlement hierarchy are considered to be based off relatively biased findings in favour of rail</p>	<p>The Settlements Appraisal Review is informed by a number of principles, not just proximity to rail infrastructure. Many of the settlements on the Rural Vale have limited services and facilities.</p>	

<p>infrastructure. The clear sustainability credentials of other areas and settlements within the Rural Vale should not be discounted.</p>		
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## Policy SP3 Housing Requirement

### Evidence Base

Issue raised	Council response	Action
<p>The “ identified need” is an incorrect term as it is not an objective assessment but one based upon a range of statistics providing a subjective view.</p>	<p>The term ‘identified housing need’ is included in Planning Policy Wales (PPW) and as such is considered to be an appropriate terminology.</p> <p>The housing requirement has been informed by a wide range of evidence, including stakeholder engagement, in accordance with the requirements of PPW.</p>	<p>N/A</p>
<p>The Council has a poor track record of completions on housing developments compared with original estimates.</p>	<p>Housing completions are monitored in an LDP Annual Monitoring Report which is published every October. This has found that since 2016-17, completions have exceeded the Average Annual Requirement of 630 units per annum in four out of the last seven years. Housing completions are influenced by wider factors and in this time period housebuilding has been affected by the Covid 19 pandemic, the war in Ukraine, the cost-of-living crisis and recession. Despite this housing completions have remained relatively strong.</p>	<p>N/A</p>
<p>It is totally opaque how the findings of the LHMA have influenced the scale of growth.</p>	<p>BP10A Draft LHMA Summary Note sets out how the latest LHMA relates to the Preferred Strategy.</p> <p>The level of need identified in the LHMA is almost equal to the housing requirement in the RLDP. This is due to the significant backlog on need that exists in the Vale with a significant backlog of existing need. The RLDP, through its affordable housing policies, can play a role in the delivery of affordable housing through Section 106 agreements and through the allocation of affordable housing led sites. However, the contribution the planning system can make is limited. A higher housing requirement would theoretically increase the opportunities for affordable housing delivery, but it is unfortunately unrealistic to assume that the level of need can be fully met, particularly within this plan period. The Strategy</p>	<p>N/A</p>

	seeks to balance the need for affordable housing with a range of other objectives.	
Housing assumptions are inconsistent with the demographic information provided. Housing suitable for older people should be provided.	The evidence base recognised that there is an ageing population. Indeed, people living longer, often in single person households, is a key driver for the need for additional housing. Policy SP8 recognises the need for specialist housing including older person housing.	N/A
The number of homes proposed in Rhoose exceeds the growth assessment.	<p>The housing requirement figure relates to the Vale as a whole, and the distribution of this growth across the settlement hierarchy is a policy matter for the Council. There is not therefore a 'growth assessment' for the overall level of housing (market and affordable) for specific settlements such as Rhoose.</p> <p>The LHMA, however, identifies a need for affordable housing on a per annum basis. The draft LHMA (BP10A) identifies a need for approximately 300 affordable homes in Rhoose over the LHMA period. The delivery of this will be through the planning system. The proposed allocations in Rhoose will make an important contribution towards the delivery of this.</p>	N/A
Need to ensure new housing won't be used for second homes.	<p>Council tax records indicate that in 2023 only 400 properties in the Vale were classed as second homes, which equates to less than 0.7% of the overall stock.</p> <p>Whilst there are no controls in place in the Vale to restrict residents from purchasing new properties, as second homes, historically this has not been the case and a recent introduction of a 100% Council tax premium for second homes may act as a disincentive.</p>	N/A
If population growth was around 5,000 between 2011 and 2021, why are over 7000 homes planned? This will encourage more inward migration and	As explained in the demographic evidence (BP7 and BP8) the projected housing growth is based on population projections over a 15-year period. The preferred growth projection is policy based, rather than relying on past trends, as it is important that the RLDP addresses a number of key demographic challenges including the ageing population, falling birth rates	N/A

<p>impact on net zero targets as they are likely to be drivers.</p>	<p>and a decline in the working age population. The Preferred growth scenario requires an element of in-migration to respond to these challenges and achieve a more balanced demographic.</p> <p>It should be noted also that the household projections show a decline in household sizes as smaller households (1 and 2 person) are expected to increase. This means that even if the population were to remain static, there would be a need for additional housing.</p> <p>The Preferred Strategy seeks to align new housing, employment, services and facilities to reduce the need to travel. However, where travel is necessary, key sites are located in places where sustainable transport options currently exist or proposed improvements are likely to take place.</p>	
<p>The RLDP Preferred Strategy includes a statement that in-migration to the VoG will be complementary to and not competing with Cardiff. It is not understood what this means or how it is to be achieved.</p>	<p>This is explained further in BP20 Joint Position Statement with Cardiff. Following the adoption of the Vale of Glamorgan LDP in 2017, housebuilding increased significantly, with many allocated sites being brought forward early in the development plan period. Cardiff's adopted LDP has been slower in the delivery of new housing due to the complexities of delivering strategic sites at a more significant scale. Over the same time period, there have been high levels of migration from Cardiff into the Vale, primarily from working families, which may be linked to the greater availability of new build housing. Cardiff's strategic sites are now delivering higher levels of housing, whilst the Vale's housebuilding rates have slowed.</p> <p>For the RLDPs, it is important that the level of new housing in the Vale is complementary to and not competing with the strategic sites in Cardiff in the delivery of family housing in particular. The Vale RLDP sets an appropriate housing requirement, based on longer term average house building rates. Cardiff is also planning for a level of growth informed by recent evidence, where its delivery will be on rolled forward strategic sites, which are now progressing. It is therefore considered that whilst there may still be out migration from Cardiff into the Vale for a variety of</p>	<p>N/A</p>



	<p>reasons, the availability of new housing is not going to be such a significant driver given that similar products are also available in Cardiff. As a consequence, it is considered that the level of growth planned in both the Vale and Cardiff's LDPs is balanced appropriately.</p>	
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### **Level of housing proposed**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The level of growth should be more ambitious to align with the aspirations of national policy.</p> <p>The figure should be seen as a minimum.</p>	<p>The Council commissioned Edge Analytics to prepare a technical paper that considered a variety of growth options for the RLDP (BP7 Housing &amp; Employment Growth Options). The Council therefore considers that the level of growth identified in the Preferred strategy is robust and supported by appropriate evidence.</p> <p>Welsh Government have indicated that they are in agreement with the level of housing proposed, and as such, the growth level is seen to be in accordance with national policy.</p>	N/A
Objection to number of houses	<p>The Council commissioned Edge Analytics to prepare a technical paper that considered a variety of growth options for the RLDP (BP7 Housing &amp; Employment Growth Options). The Council therefore considers that the level of growth identified in the Preferred strategy is robust and supported by appropriate evidence.</p>	N/A
<p>Objection to level of housing due to poor public transport</p> <p>Insufficient infrastructure to support level of housing.</p>	<p>Key sites are located in places that are in sustainable locations, reducing the need to travel, and in places well served by existing and proposed public transport.</p> <p>New development will be required to facilitate improvements to the infrastructure.</p>	N/A
Query where the extra people are coming from	As set out in the demographic information (BP7 and BP8) the primary driver for population change is net migration. The level of growth would	N/A

	assume people moving to the Vale from elsewhere in Wales/UK and internationally, combined with a reduction in out-migration i.e. people choosing to stay and the Vale and not move elsewhere.	
Amalgamation of the existing community with new residents is awkward.	<p>It is intended that a series of placemaking workshop will be held on key sites to discuss key placemaking principles which will assist with integrating communities.</p> <p>It is important to note that not everyone moving to a new housing site is a new resident. Many people are local residents moving within the same housing market area, including those in affordable housing need.</p>	N/A
Refurbish old/vacant properties before building new	The principle of refurbishing vacant properties is supported where this is acceptable in planning terms. The housing supply calculation includes a windfall assumption for small and large sites. The refurbishment of vacant buildings for residential use would be included as a windfall contribution and as such has been factored into the land supply calculation.	N/A
<p>The scale of growth needs to consider the Vision and Objectives and should be reduced if the impact is adverse.</p> <p>Housing numbers should not be determined without consideration as to the availability of suitable sites.</p>	<p>The Vision and Objectives seek to balance a range of issues, including Objective 3 'Homes for All.' The level of growth will not have an adverse impact on the Vision and objectives provided the right sites in sustainable locations are chosen, which is what the strategy seeks to do.</p> <p>BP6 Spatial Strategy Options sets out the key constraints that would influence the level and spatial distribution of growth. The background paper identifies areas that should be avoided – for example flood zones, sites comprising Best and Most Versatile agricultural land and sites significantly affected by ecological designations. It is considered that there is sufficient unconstrained land in the Vale to allow the housing requirement to be delivered in an appropriate manner.</p>	

**Policy wording**

Issue raised	Council response	Action
The plan should state the exact number of affordable housing led allocations at Preferred Strategy stage as this would allow greater opportunity to influence the Plan. This conflicts with what PPW requires.	As stated in the Preferred Strategy, affordable housing led sites will be identified at Deposit stage. The Development Plans Manual states that the Preferred Strategy should include 'key sites/growth areas' but it would not normally be the case that all non-strategic sites, especially at the scale of affordable housing led sites (25-50 dwellings), would be identified at Preferred Strategy.	N/A

**Table 2 - Housing Requirement Calculation**

Issue raised	Council response	Action
<p>Is the 10% extra housing necessary? If you remove this, the number of homes needed would decrease by 789.</p> <p>The 10% could be made up from windfall sites that are not currently included in the housing totals.</p>	<p>The WG Development Plans Manual (DPM) states "<i>It will be extremely rare that all sites identified in a plan will come forward in the timescale anticipated... This means that a flexibility allowance must be embedded into the plan... 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.</i>" It is therefore necessary that a flexibility allowance is included in the Plan.</p> <p>Table 2 of the Preferred Strategy shows that the contribution from windfall sites has already been factored into the housing land supply calculation.</p>	N/A
Flexibility should be increased as AMR shows shortfall of delivery of 18% and Bridgend were required to increase their flexibility to 20%.	The adopted LDP contains a 10% flexibility allowance. The adopted LDP Inspector's report states " <i>it is generally accepted that 10% should be the starting point, with local deviations based on the extent of deliverability concerns.</i> " In respect of deliverability, the Inspector goes on to say " <i>given the degree of scrutiny over the deliverability of the allocated sites and the generally good market areas within which the allocations are located, I see no reason why the scale of growth cannot be achieved to deliver the identified housing needs.</i> "	N/A

	<p>Following changes to allocations in the Bridgend RLDP Examination process, the flexibility allowance was reduced from 20% to 14%. The Inspector's Report states "<i>Although I note the scale of this reduction, I am mindful that the supply of housing would still exceed the HR by a level of provision equivalent to the Plan's anticipated annual build rate for a period of 2 years. This, coupled with the with the robust analysis of past and future build rates provided in the Background Paper 37: Housing Trajectory [SD37], provides clear and convincing evidence that the HR can be delivered in the manner envisaged over the Plan period.</i>"</p> <p>A housing trajectory will be prepared as part of the evidence base for the Deposit RLDP and will be agreed with the development industry. This will provide robust evidence on the delivery rates for allocations and will demonstrate that a higher flexibility allowance is not required. Subject to a robust housing trajectory being prepared it is considered that the continuation of a 10% flexibility allowance remains appropriate.</p>	
<p>A flexibility allowance of 15% should be used in line with other RLDPs.</p> <p>10% flexibility is described as a starting point.</p> <p>The plans are reliant on large greenfield sites in Barry and St Athan. Greenfield sites have longer lead in times often associated with providing infrastructure and services for the flexibility should be higher.</p>	<p>The most recently adopted LDP (Bridgend) in Wales contains a flexibility allowance of 14%. The Vale of Glamorgan is arguably a more viable area and can demonstrate good delivery rates in the Adopted LDP, which would justify a lower rate of flexibility.</p> <p>A housing trajectory will be prepared as part of the evidence base for the Deposit RLDP and will be agreed with the development industry. This will provide robust evidence on the delivery rates for allocations and will demonstrate that a higher flexibility allowance is not required. Subject to a robust housing trajectory being prepared it is considered that the continuation of a 10% flexibility allowance remains appropriate.</p>	<p>N/A</p>

20% Flexibility should be used as the latest AMR identifies a shortfall of housing land supply.	The 2023 AMR does identify that the average completions compared to the cumulative dwelling completion figure is some 20% lower than the target. As explained in the report, housebuilding has been affected by wider economic circumstances outside of the control of the Council. However, the findings of one 2023 AMR report should not be considered in isolation as it is more important to consider a wider evidence base. When compared with the average annual housing requirement (AAR), the number of completions exceeded the AAR in four of the last seven monitoring years.	N/A
Either a higher overall housing requirement plus a flexibility of 15-20% should be included, or continue with medium growth options and 25-40% buffer.	The adopted LDP contains a 10% flexibility allowance. The adopted LDP Inspector's report states " <i>it is generally accepted that 10% should be the starting point, with local deviations based on the extent of deliverability concerns.</i> " In respect of deliverability, the Inspector goes on to say " <i>given the degree of scrutiny over the deliverability of the allocated sites and the generally good market areas within which the allocations are located, I see no reason why the scale of growth cannot be achieved to deliver the identified housing needs.</i> "  A housing trajectory will be prepared as part of the evidence base for the Deposit RLDP and will be agreed with the development industry. This will provide robust evidence on the delivery rates for allocations and seek to achieve agreement that a higher flexibility allowance is not required.	N/A
It is assumed in line C that all units with planning permission will be delivered. It is suggested that a 30% discount is applied. Cardiff use a 20% discount.  Only 1,046 units of the 2,536 units with an existing planning permission have been started as of April 2023.	Appendix A of the Preferred Strategy shows the list of sites with planning permission, including sites under construction as of 1 <sup>st</sup> April 2023. This will be updated prior to the publication of Deposit Plan with the latest information.  The DPM (Table 18) states that " <i>a 'non-delivery allowance' is factored into the land bank; discounting a proportion of the land bank based on local evidence. This may not be appropriate for all LPAs, but relevant for LPAs with a large number of land bank sites, not those with just a few sites, or in</i>	Review the sites with planning permission with the housing stakeholder group.

	<p><i>areas where the land bank is made up of numerous small sites which take a long time to complete. To be clear, a land bank non-delivery allowance is separate to the flexibility allowance (i.e. 10%) which is applied to the plan as a whole.”</i></p> <p>The guidance states that sites can be discounted individually or a non delivery allowance can be applied as a percentage across the overall land bank. The calculation in the Preferred Strategy does not currently include a non-delivery allowance, as the Vale has a strong delivery rate of existing permissions. Over half of the sites listed are under construction and many others are being brought forward by RSLs are expected to commence in the near future. However, the Council will, in consultation with the housing stakeholder group seek to discount sites that are considered unlikely to progress. Such an approach will accord with the DPM, which states sites can be discounted individually.</p>	
<p>Line D includes rolled forward sites. It is unrealistic to assume these will all be delivered.</p> <p>Rolled forward sites should be used first before new sites are considered.</p> <p>Rolled forward sites have not been delivered in the current plan period, which suggests they are economically unviable or have significant site constraints.</p> <p>Other Local Authorities have used a percentage reduction approach.</p>	<p>Details on the rolled forward sites are contained in Appendix 2 of the Preferred Strategy and BP9 Housing Land Supply. It should be noted that not all undeveloped RLDP sites have automatically been rolled forward. Only those that are realistically likely to be delivered have been included. Four of the sites have planning applications awaiting determination on them, two are part of the Council’s Housing Deliver Programme and there is evidence of developer interest on another.</p> <p>These sites will be reviewed by the Housing Stakeholder Group as part of the evidence base for the Deposit Plan.</p>	<p>Review the rolled forward sites with the housing stakeholder group.</p>

<p>Empty homes should be included within the calculation. In 2019 there were 846 empty properties.</p>	<p>2023 Council tax data indicates that there were 528 long term empty homes in the Vale, which equates to less than 0.9% of the overall stock. Whilst there are merits in doing so, there are significant resources involved in returning empty homes back to beneficial use and the contribution these can make to the overall supply is limited.</p> <p>The re-use of empty homes or buildings are not normally included as a separate category in the housing land supply calculation but this is monitored through housing completions, this will be counted as part of the windfall supply.</p>	<p>N/A</p>
<p>The plan relies too heavily on windfall sites.</p> <p>Windfall sites should only relate to 9 years of the plan period – 2 years after adoption.</p> <p>Small windfall sites should apply a 25% discount as the last 10 years have been lower than the 20 year average.</p> <p>The urban capacity study over-emphasises the potential yield from windfall sites</p>	<p>In accordance with the DPM, it is necessary to review past windfall delivery rates to help to inform future trends. This should be done over different time periods. The evidence for this is set out in BP9 Housing Land Supply. Table 5 of the background paper shows that the 10 year average and 20 year average large windfall completions are similar at 74 and 73 units respectively. The figure of 74 units per annum is therefore considered appropriate to use.</p> <p>The DPM states that “<i>LPAs should ensure there is no double counting in the early years of the plan between large windfall sites and those with planning permission. In practice, it is not recommended to include a large windfall allowance rate within the first 2 years of projected supply to avoid issues of double counting.</i>”</p> <p>This advice has been followed in the calculations. The housing land supply calculation has excluded the first year of the plan period, as actual completions data is available. It has then discounted the following two years and applied the windfall figure for the final 12 years of the land period.</p> <p>BP19 Urban Capacity Study considers development opportunities in the Vale’s two largest urban areas – Barry and Penarth. The study evidences the potential yield, but is clear on its limitations stating “<i>Whilst it is not expected that all the identified yield will be developed, and cumulatively it</i></p>	<p>N/A</p>

	<i>may not even be acceptable for that, the Study shows that there is sufficient capacity for windfall development in Barry to meet the projected windfall housing figures.”</i>	
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### **Spatial distribution of housing**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>More growth should be allocated to the rural Vale as many of the sites in the rural Vale have been built out or are under construction.</p> <p>The Plan does not fully support the growth and continued sustainability of minor or smaller rural settlements.</p>	<p>The Preferred Strategy has been prepared in light of changes to national planning policy which places significant focus on developing in sustainable locations.</p> <p>This is accepted by Welsh Government, who state that replicating a strategy with a rural settlement approach going forward would not comply with Future Wales or PPW in terms of sustainable development and transport.</p> <p>Through the small-scale affordable housing led site approach and allowance for infill developments or conversions, there will remain opportunities for development in appropriate minor rural settlements, but their contribution will be smaller than in the adopted LDP.</p>	N/A
<p>More growth should be allocated in settlements such as Rhose as this area is sustainable.</p>	<p>Comment noted. A key site of 450 dwellings and a rolled forward site of 282 units are identified in Rhose. This is considered an appropriate level of growth.</p>	N/A
<p>Are there alternative sites for the proposed volume of houses, or have you considered using multiple smaller sites to accommodate this level of housing?</p>	<p>BP6 explains the Spatial Options that were considered and BP17/BP18 set out the findings of the candidate site assessment process in respect of other sites. The Preferred Strategy has sought to identify a small number of large sites as these can best deliver of infrastructure requirements and placemaking principles.</p>	N/A
<p>It would be prudent to focus growth in areas of greatest demand. Pattern of</p>	<p>The Strategic Growth Area has been defined in consideration of these factors, and also reflecting the need for affordable housing.</p>	N/A



<p>development should reflect the population increase and migration from Cardiff by prioritising growth in settlements such as Dinas Powys which represents the most suitable location to Cardiff and inherently well connected by the existing rail network and other modes of public transport.</p>		
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**Deliverability**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>There is limited analytical consideration to the viability and deliverability of the sites proposed.</p>	<p>The Deposit RLDP will be supported by a high-level viability assessment and further deliverability information on the key sites.</p>	<p>N/A</p>
<p>The LPA should not be solely relying on the existing supply and large development sites.</p> <p>Placing reliance on only a few new allocations for housing delivery puts the RLDP at great risk of underperforming. Seeking additional new allocations will reduce this risk and give greater certainty of delivering the RLDP housing requirement.</p> <p>A range and choice of suitable, viable and deliverable sites should be allocated to provide much needed open market and affordable homes.</p>	<p>The existing supply, including rolled forward sites, and the 5 key sites will deliver the majority of the housing requirement. Key sites of a significant scale have been chosen as these will offer a greater opportunity to deliver necessary infrastructure improvements and deliver placemaking principles, including a mix of uses.</p> <p>However, it is anticipated that at Deposit stage a small proportion of the housing provision will be met by other site allocations that can assist in the delivery of the strategy either as allocations in the strategic growth area, or small site affordable housing led sites outside of the strategic growth area.</p>	<p>N/A</p>

Greater acknowledgement should be afforded to smaller, residential sites in smaller settlements. Not possible to simply rely on key settlements.		
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### **Housing Land Supply Table**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Since the Preferred Strategy was prepared, Candidate Site ID 365 (Leckwith Quay) is now the subject of a resolution to grant planning permission (subject to S106), for up to 228 dwellings (ref: 2020/01218/HYB). These units should therefore be included within the table of committed sites and factored into the supply of homes for the purpose of Policy SP3.	Whilst the Council's planning committee resolved to grant planning permission subject to Section 106, the application has subsequently been called in by the Welsh Ministers. The outcome of this decision is unknown at this time but if a decision is made prior to the Deposit RLDP being published this will be reflected accordingly.	Keep under review the position with the application and if ultimately approved by Welsh Ministers, include within the land supply in the Deposit Plan.

### **General Comments**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The quality of the new housing developments is generally poor.	The RLDP can influence the quality of the built environment through placemaking, but the actual quality of workmanship when houses are constructed is controlled by building control, which is outside the remit of the RLDP.	N/A

## Key Sites, Policy SP4 and Rolled Forward Sites

### Representations on the 5 Key Sites

The number of representations received on each key site is set out below. The table includes the number of respondents that made comments i.e. the number of different individuals and organisations, as well as the number of representations made in the form of support, object or comment. There are more representations than respondents as some people made representations that were specific to the key sites in different parts of the Plan. Duplicate representations have only been counted once, but if representations made at different points, these have been counted separately.

Many respondents commented on both the North East Barry and North of Dinas Powys sites in the same representation. This is also the case for the two sites in St Athan. Where this was the case, the representations have been counted under both sites.

To aid responding to the representations, the issues raised by respondents have been grouped by category, for example, highways and transport, flooding etc, although the sub-issues are different across the 5 sites.

There were also a number of representations where the respondent did not specify which key site they were referring to or had comments that applied more generally across all 5 of the sites. These are addressed in the final section.

	<b>Respondents</b>	<b>Representations</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>
<b>SP4 KS1 North East Barry</b>	394	480	0	462	18
<b>SP4 KS2 Land North of Dinas Powys</b>	476	556	1	540	15
<b>SP4 KS3 Land at Readers Way, Rhoose</b>	60	97	0	88	9
<b>SP4 KS4 Land at Church Farm, St Athan</b>	51	151	2	134	15
<b>SP4 KS5 Land to the west of St Athan</b>	51	146	1	126	19

**SP4 KS1 North East Barry**

**NRW Response (as summarised)**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Concern exists with the proposed level of development at this site. We consider development at this scale, near the SSSI poses several risks, including increased unauthorised and unmanaged public access. This is a large-scale site which is currently shown to be partially within, and in close proximity to the Barry Woodlands SSSI. The SSSI is designated for its seminatural ancient woodland habitat with its rich woodland flora, but it is fragmented with clustered units to the east and west of the site. Resultantly it is important to maintain the connectivity of the woodland units, but the proposed site boundary exists between two of the clusters of the SSSI.</p> <p>As set out in the revised PPW Chapter 6 development (other than minor) in SSSIs is considered unacceptable as a matter of principle. In addition, development not within a SSSI, but likely to damage a SSSI should be avoided. As outlined in our previous response (Ref: CAS-239774-P8M9 dated 15th November 2023) although a buffer is being proposed between</p>	<p>The Council acknowledge NRW's comments and agree that there is a route to creating a sustainable development and wish to continue engagement on key issues with NRW and the developer, toward addressing concerns.</p> <p>Comments in relation to the impact on the SSSI. Thus far, discussions have resulted in amendments to the site layout, and it is the Council's view that the current position is a marked improvement on the starting point, however, this may require further revision. Engagement has resulted in the site layout being informed by the outcomes of the Preliminary Ecological Assessment, including removing the marshy area of grassland from the developable area of the site and removing and realigning development parcels to better respect the SSSI. Furthermore, a significant opportunity for biodiversity net benefit exists at the northern end of the site, which will create better connectivity between the two fragmented SSSI parcels.</p> <p>These are viewed as positive steps toward overcoming concerns and creating a sustainable development that both respects the site's biodiversity and ecology value and facilitates development to meet the housing requirement.</p> <p>Comments are noted in relation to potential conflicts between biodiversity, ecology and public open space and the ongoing Masterplanning work will give due consideration to this.</p> <p>Comments are noted in relation to flooding and development will be directed away from areas within flood zones. The illustrative Masterplan does not identify any built development within the southern part of the site, which is within the main river flood plain, with this area being proposed for sustainable drainage. The potential interaction with small watercourse and surface water flood risk will also</p>	<p>The Council will continue to engage with NRW and the developer in order to overcome concerns relating to the impact of the development.</p>

<p> dwellings and the SSSI, in its current form this is unlikely to mitigate against trespassing and therefore damage the SSSI.</p> <p>We also note the presence of marshy grassland, a priority habitat to the north of the site which should be protected. Following the step-wise approach (6.4.21) the onus is 'to avoid damage to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning'. We therefore continue to have concerns with the placement of the proposals on this site. Given the scale of the site, we consider there is scope to reduce the developed area and enable a sustainable design that reduces impacts and the potential for impacts upon the SSSI, whilst also maintaining, enhancing and managing the important retained and created habitats on site.</p> <p>This may however impact the viability of the site. With regards to green infrastructure, we note that certain biodiversity mitigation proposals and approaches may not be compatible with increased public access. This should be considered during any design or master planning phase. For example, areas of species rich grassland require ongoing management, either through annual</p>	<p>be considered as part of the SAB approval process, as per the specific Flooding and Drainage response below.</p>	
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<p>cutting or use of grazing animals. Neither of these management approaches are compatible with use of the site by people and dogs.</p> <p>Therefore, the need to accommodate both publicly accessible greenspace and biodiversity mitigation within strategic sites will require a realistic appraisal of the space required, alongside any proposed built development. The aspiration for placemaking and sustainable development is welcomed, however they all require space to deliver and significant ongoing commitment to manage.</p> <p>Further to the above, we advise that any master planning for this site takes into account the results of any ecological surveys and discussions are undertaken with the Local Authority Ecologist to determine the scope of any additional European Protected Species surveys such as dormice, great crested newts and bats. This should include any compensation for potential habitat loss.</p> <p>The southern portion of the site is located within Zone C2 of the Development Advice Map (DAM) and FZ3 for Rivers of the Flood Map for Planning (FMfP). The main rivers Nant Yr Argae and Cold Brook also flows</p>		
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<p>directly adjacent to the eastern and southern boundary of the site respectively, with minor watercourses also present along the North and North West boundary. Any built development in this area should be avoided in any master planning stage. Given the proposed number of dwellings, we advise consideration is given of the above potential mitigation measures to determine whether the potential reduction in dwellings will make the site viable.</p>		
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**DCWW Response**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p><b>Water supply:</b></p> <p>A HMA will be required to establish the impact of the proposal on the existing water network and potential developers would be expected to fund investigations during pre-planning stages.</p> <p>A 125mm diameter watermain crosses this site. Potential developers need to be aware that easement widths would be required which may impact upon the development density achievable on site.</p> <p><b>Public sewerage networks</b></p>	<p>Thank you for your comments these are noted.</p>	<p>The Council will relay the responsibilities set out by DCWW to the Developer.</p>

<p>A HMA will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.</p> <p><b>WwTW</b></p> <p>The site falls within the catchment area of Cog Moors Wastewater Treatment Works (WwTW) which has capacity to accommodate the domestic foul flows from this site.</p>		
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**NGED Response**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The proposed allocation site at north east Barry is traversed by NGED infrastructure comprising a 132kV overhead line with c.10 pylons hosting the line.</p> <p>NGED does not object to the proposed allocation, subject to the proposed allocation policy safeguarding the line in situ. NGED welcomes the commitment to further detailed assessment work prior to publication of the Deposit Plan. The detailed assessment should take into account the presence of the overhead line and the need to incorporate the retention of the</p>	<p>Thank you for your comments these are noted.</p>	<p>The Council will relay the responsibilities set out by NGED to the Developer with the intention of carrying out further work to consider impacts to the 132kV overhead line that runs through the site.</p>



<p>overhead line into any forthcoming masterplan.</p> <p>NGED is happy to discuss proposals in further detail with Officers and input to the masterplanning process, as appropriate.</p>		
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### **Highways and Transport**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p><b>Highways Issues</b></p> <p>The scheme will add more cars to the road and reinforce car usage. This conflicts with the ISA and Objective 1 of the Preferred Strategy.</p> <p>There are already several roads (Cardiff Road, A4231, A4050) and junctions (Argae Lane &amp; A4231, Culverhouse Cross, Dinas Powys Primary School, Merrie Harrier, Cogan Spur) in the locality of the site and between the site and Cardiff that are at capacity. At rush hour these roads are significantly congested, and these proposals will only exacerbate those problems.</p> <p>This scheme should not be allowed to go forward until such a time as a bypass has been built around Dinas Powys. A bypass is required to deal with additional car journeys.</p>	<p>It is acknowledged that new development may generate an element of additional traffic. However, there is a requirement that the RLDP makes provision for housing and the implications of additional traffic must be balanced against this. As shown in the Stage 1 Strategic Transport Assessment, which largely uses pre-pandemic data there are junction capacity issues in several locations within the Vale of Glamorgan. This isn't an issue localised to the areas where new allocations are being proposed, and the introduction of new housing in any location within the Vale would likely exacerbate current issues.</p> <p>A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan. This will include updated data, which will take into account post-pandemic travel patterns. This will also identify any mitigation that may be required to reduce the impact of the additional traffic from the sites.</p> <p>To mitigate against the harm of additional traffic, sites, including North East Barry, have been selected to reflect the chosen spatial option for the Preferred Strategy, which sought to site new development in the most sustainable transit-oriented locations. This strategy seeks to reduce the need to travel and where journeys need to be made site new development in proximity to sustainable transport nodes, prioritising the provision of active travel links. The Council will also consider car parking provision at the site and whether lower requirements would be acceptable in order to promote modal shift.</p>	<p>The Council will publish a Stage 2 Strategic Transport Assessment alongside the Deposit Plan</p> <p>The Council will consider options to ensure that the development does not exacerbate issues along the lanes between the site and Dinas Powys.</p> <p>The Council will work with the developer to identify what facilities and services should be delivered on site in</p>

<p>The lanes between the site and Dinas Powys (Argae Lane, Westra and St Andrews Road) are currently used as a rat run and access onto Argae Lane will only make this worse. These lanes are used by pedestrians, cyclists and horse riders and increased traffic would impact their safety. Access along the lanes from the site should be limited.</p> <p>Highways improvements should take place before development commences.</p> <p>The new junction in place of the roundabout on the A4231 will add to congestion and waiting times along the road.</p> <p>More cars coming from the site will create more air pollution in the locality. This will cause specific issues at Dinas Powys Primary School and Llandough Hospital</p> <p><b>Sustainable Transport</b></p> <p>These proposals conflict with Llwybr Newydd and its modal shift aspirations. Future residents will likely drive from the site as it is the most convenient mode. The site is not close enough to nearby services, including Cadoxton Train Station, to motivate people to make</p>	<p>When considering the sites submitted through the RLDP Call for Candidate Sites, and the quantum of new housing that needs to be delivered, it was considered that the North East Barry site was appropriate in terms of complying with the spatial strategy and making a notable contribution toward achieving the required housing numbers.</p> <p>In terms of proximity to services, the site is located in relatively close proximity to a range of the services that exist in Barry and is notably close to a High School and supermarket. The proposals for the site also include a primary school and two areas for mixed uses, thus providing services, facilities and potentially employment on site. The provision of services, facilities and employment on site will reduce the need to travel in line with the Preferred Strategy.</p> <p>The introduction of housing in this location would create a critical mass that could facilitate a bus service to run through the site, providing links to services and facilitates within Barry, including the local train stations. The proposals currently include designing the main route through the site to a standard that would allow for a bus service to enter and exit the site. Officers will liaise with bus operators on the provision of a new service or rerouting of an existing service to serve the site.</p> <p>The proposals for the site include significant active travel improvements between the site and the Cadoxton area of Barry, with the focus of these being to improve connectivity with Cadoxton Train Station. These improvements would have the purpose of making active travel a safer option for journeys and would allow for improved accessibility from the site to the services in eastern Barry and the Train Station. 20 minutes is considered to be an appropriate journey time by walking and cycling to access train stations. Currently, a portion of the south of the site is within walking distance of Cadoxton Station and the site is wholly within a 15-minute cycle. These proposed active travel improvements would have the potential to improve travel time. All travel time data has been provided by Transport for Wales.</p> <p>It is appreciated that trains travelling along the Vale of Glamorgan Line are currently well used during peak times. TFW have committed to introducing</p>	<p>order to meet the needs of communities.</p> <p>The requirement for an Air Quality Impact Assessment to be undertaken as part of a planning application will be identified in the Deposit RLDP.</p> <p>Officers will liaise with bus operators on the provision of a new service or rerouting of an existing service to serve to site.</p>
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<p>journeys by active travel. The development conflicts with Objective 8.</p> <p>The site is not currently accessible by active travel and any existing routes are unsafe.</p> <p>Trains that serve Cadoxton Train Station are at full capacity at peak times and it is not apparent that additional capacity will be added.</p>	<p>additional services at peak times and they will also be introducing new trains to the Line with increased capacity.</p> <p>It is understood that the Argae Lane, Westra and St Andrews Road are currently used as rat runs and this causes safety issues for vulnerable users (pedestrians, cyclists and horse riders). The Council is considering how this issue can be addressed so that it isn't exacerbated, and the Deposit Plan will include further detail on this issue. Options that could be considered may include limiting access to permit holders/residents or allowing access in one direction only, but further work and engagement with key stakeholders will be required before a decision is taken. It is important that the route remains open for pedestrians and cyclists.</p> <p>Any proposed new junction will be modelled and designed to cater for the anticipated traffic flows from any approved new development.</p> <p>Nitrogen dioxide levels are extensively monitored in Dinas Powys (as well as other areas within the Vale of Glamorgan). Whilst less likely to be an issue, PM2.5 and PM10 will also be monitored soon in the settlement. The most recent reporting of nitrogen dioxide data identified that all monitoring locations within Dinas Powys were well within the legal limits for nitrogen dioxide (<a href="#">APR VOG 2023 (srs.wales)</a> – see page 24). Prior to the determination of any planning application at the sites, Air Quality Assessments would have to be carried out that would investigate the implications of air pollution on the site and resulting from an increase in car journeys from the site. Appropriate mitigation can be put in place at that time to address any potential issues.</p> <p>Agreed improvements to the highway network, including the provision of active travel routes, will be phased as the development comes forward. This will be controlled by a legal agreement. Safe access and egress from the site, likely including the upgrading of junctions adjoining the site along the A4231, would have to take place early in the development of the site.</p>	
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**Conformity with Preferred Strategy**

Issue raised	Council response	Action
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<p>The site does not conform with the RLDP Vision.</p> <p>The site does not conform with LDP Objectives.</p> <p>The site contradicts the Preferred Strategy as it does not align new housing development with employment. This conflicts with Objective 7.</p> <p>The Preferred Strategy identified that sites will be small scale and affordable housing led. This site is neither.</p> <p>The proposals conflict with the candidate site methodology.</p> <p>The proposals conflict with town centre first policy as proposed retail units on site will cause further decline in existing town centres.</p> <p>The site contradicts the Preferred Strategy as it is not located near public transport.</p>	<p>The Council strongly believe that the site aligns with the Preferred Strategy. With regard to the Vision, an integral part is housing growth that delivers homes for all. The purpose of this is to meet the high housing demand, which is particularly acute in the Barry area. This site goes a significant way toward meeting the residential requirement identified in the Preferred Strategy. Fundamentally, without the delivery of housing the intention of the Vision cannot be achieved. Ultimately, that delivery does lead to the need for issues to be balanced in some cases. However, through aligning with the drafted strategic policies within the Preferred Strategy and national planning policy, particularly on placemaking, it will be ensured that the site conforms with the Vision in its entirety.</p> <p>Key element 4 of the Preferred Strategy is: <i>Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement.</i> This is one of 6 key elements that comprise the Preferred Strategy. Evidentially, this does not apply to this site, or any of the other Key Sites. As set out in the Preferred Strategy this key element exists to allow for the provision of affordable housing in less sustainable locations than those within the Strategic Growth Area. There will however be a requirement for a percentage of the site to be affordable.</p> <p>Similarly, aligning new housing with employment is also a part of key element number 2, although this key element is broader, as follows: <i>Aligning locations for new housing, employment, services and facilities to reduce the need to travel.</i> It is considered that this site does align housing with employment as it is in close proximity to Barry Docks and the range of employment uses that exist there. Furthermore, there are other facilities and services within Barry itself that would provide employment. There is no more suitable site within proximity of Barry and the employment opportunities that it provides, particularly at the Docks, that would be able to deliver this quantum of development.</p> <p>The site is considered to comply with the candidate site assessment methodology as identified within the Candidate Site Assessment at Preferred Strategy (<a href="#">Rotated BP18 Candidate Sites Assessment at Preferred Strategy stage— Final.pdf (oc2.uk)</a> – see pages 28&amp;29).</p>	<p>N/A</p>
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	<p>The facilities and services delivered on site would comply with Placemaking principles and would improve the overall sustainability of the site. This part of Barry, as existing, is limited in its services and facilities and this site offers the opportunity to improve this.</p> <p>The sustainable transport credentials of the site have been addressed at length in the Highways and Transport section.</p>	
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### **Conformity with Council Policy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The proposals do not align with corporate Council Policy, including the Corporate Plan 2020-2025, which states that an aim is to 'respect, enhance and enjoy our environment'.</p>	<p>As set out in BP4 'Assessment of the Preferred Strategy Against the Tests of Soundness' the Preferred Strategy is considered to align with key Council corporate policy including the Wellbeing Plan 2023 – 2028 and the Corporate Plan 2020 – 2025.</p> <p>The Well-Being Plan and associated wellbeing assessment was integral in identifying the key issues to be addressed in the RLDP and which were considered when drafting the Vision and Objectives.</p> <p>The Strategy is also informed by the Council's Corporate Plan and the challenges identified within this, including to respect, enhance and enjoy our environment. The proposed allocation of this site visibly aligns with this objective as development will create a vastly greater area of publicly accessible open space when compared to existing accessibility to the site, allowing for greater enjoyment. Through delivering biodiversity net-benefits the development will also respect and enhance the environment.</p>	<p>N/A</p>

### **Flooding and Drainage**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>There have been bad floods in the locality of the site in recent years; along Cardiff Road, along the Argae Lane,</p>	<p>It is acknowledged that significant concern was raised in relation to the implications of flooding. The developer has produced a high-level Flood Risk and Drainage Assessment, and this concludes that development of the site would not</p>	<p>The Council, including the SuDS Approval Body, will</p>

<p>along the Coldbrook, along the Cadoxton river, and in Dinas Powys. Further development would exacerbate issues and conflicts with the ISA and Objective 1 of the Preferred Strategy.</p> <p>The site has been known to flood and the area between Barry and Dinas Powys is generally prone to flooding. Due to the topography of the land, water will drain to the southern part of the site where flooding issues will persist. The southern portion of the site is a floodplain.</p> <p>No evidence has been supplied showing an appropriate drainage strategy is in place for the site. Development of the site will result in water runoff being displaced from the site. The loss of natural drainage features will mean less penetration on site, and this will exacerbate flooding issues in the locality.</p> <p>New development elsewhere in the locality has already contributed to worse flooding.</p>	<p>be prejudiced by flooding or drainage issues. Prior to the allocation of the site the Council's Drainage Team and NRW will have to be satisfied that the drainage and flooding measures proposed on site are sufficient to deal with the associated risk. A Strategic Flood Consequences Assessment has been carried out which reviewed the implications of flooding across the Vale of Glamorgan. This work informed site selection and meant that development could be directed away from the areas where greatest flood risk exists.</p> <p>Since 2019 Sustainable Drainage Systems (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 detriment offsite.</p> <p>There is a notable change in topography across the site, and the southern area is at a lower level compared to the wider site. The Coldbrook, an NRW Main River, runs through this section of the site. This results in the southernmost area being identified within Floodzones 2 and 3 of the Flood Map for Planning. As a result, this area of the site will have to be treated appropriately and in line with national planning policy on flooding, development will be directed away from this part of the site. Indeed, indicative plans presented for the site did not include any development within this area. This area of the site provides an opportunity for providing multifunctional green infrastructure. Whilst facilitating appropriate flood attenuation, including required SuDS, an opportunity also exists to open up this area to the public as high quality public open space.</p> <p>Three other ordinary watercourses transverse the site, feeding into Nant yr Argae (NRW Main River) which runs to the east of the site. These result in further small watercourse floodzones existing on site, where development would also be directed away from, and appropriate SuDS would be put in place to assist in managing flood risk.</p>	<p>work with the developer and NRW to ensure that that flood risk both on and offsite is appropriately managed.</p>
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### Sewage/Sewerage and Capacity of Facilities

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The Cog Moors Wastewater Treatment Works are over capacity and more sewage will result in overflows from the works, resulting in waste going into nearby rivers and seas.</p> <p>More sewage connections to the Cog Moors Wastewater Treatment Works will decrease the capacity for storm water, increasing the flood risk in the locality of the site.</p>	<p>The Council works closely with Dwr Cymru Welsh Water in respect of the development plan and Welsh Water input into the process to ensure that the allocations coming forward in the plan do not give rise to issues with the existing sewerage network. Where issues are raised developers will be required to deliver upgrades to the system in order to allow development to proceed.</p> <p>In relation to the Cog Moors Wastewater Treatment Works DCWW have advised that sufficient capacity exists to make connections from this site without the need for expansion.</p>	

### Heritage

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The development will impact listed buildings and county treasures</p>	<p>There are no listed buildings within the site or in close proximity to it and neither is there a conservation area. There is a County Treasure on the site, Ty Isaf, and the treatment of this will have to be determined at planning application stage. It may be that there are opportunities to retain the building and convert it. However, on balance, it is likely that the delivery of additional housing outweighs the retention of the building.</p>	<p>The Council will consider how to treat the County Treasure as the development progresses through the planning process.</p>

### Green Infrastructure

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The development will have an unacceptable impact on ecology and biodiversity at the site. The site is</p>	<p>Whilst it is acknowledged that the development will result in the loss of green infrastructure as justified elsewhere potential harm has to be balanced against allocating sites to meet the housing requirement. National planning policy and</p>	<p>Ensure the developer submits a Green Infrastructure</p>

<p>known to host a wide range of flora and fauna. The Nature Emergency should take priority. Cumulatively, this will conflict with Objective 5.</p> <p>The loss of the green corridor from Barry to Dinas Powys is unacceptable.</p> <p>The development will detriment the SSSI at Barry Woodlands through incursion of development, trespass, light and noise pollution.</p> <p>Ponds at the south of the site have valuable ecological value and SINCs are also present.</p> <p>The development will have an impact on protected species.</p> <p>Loss of tree coverage is contrary to Welsh Government targets for tree planting and the forthcoming Council Tree Strategy.</p> <p>Wildlife including owls, bats, mice, rabbits, newts, foxes, and a range of birds have been sighted on the site.</p> <p>The site is a habitat for many invertebrate, mammal (bats), bird, plant and fungi species. Including Small Timber Clothes Moth, <i>Triaxomasia caprimulgella</i>, recorded in 2023 and</p>	<p>proposed policy within the RLDP on green infrastructure is strong. Any future development at the site would have to comply with this and resultantly it is considered that a suitable scheme that protects key green infrastructure features and provides a biodiversity net benefit can be achieved.</p> <p>Broadly, the site allocation will set out what green infrastructure at the site will be protected and where biodiversity net-benefits will be achieved. More detail on this will be drawn out during planning applications for the site. However, at this stage principles for protection and net-benefits at the site can be established.</p> <p>A preliminary ecological assessment has been received for the site. Following discussions between the developer, NRW and the Council, the site layout has been amended to fully take into account the implications of this. This process remains ongoing but has assisted in directing development at the site away from the areas with the greatest biodiversity and ecology value. This land is part of a resilient ecological network linking between Dinas Powys and Barry and connectivity across the site is therefore important. The proposed site layout currently identifies green infrastructure corridors, and these will be developed further, prior to the publication of the Deposit Plan.</p> <p>In relation to the Barry Woodlands SSSI, special attention is being given to how the development can mitigate any harm to it and seek to enhance it. As set out, discussions remain ongoing between key stakeholders in relation to green infrastructure and in order for development to progress on this site this issue will have to be adequately resolved. Two parcels of the SSSI exist either side of the northernmost portion of the site. This part of the site offers an opportunity to improve connectivity between these two parcels of the SSSI. If the extent of the woodland could be expanded and connected on this tract of land this would provide a significant biodiversity net benefit that notably improves connectivity between two areas of high value green infrastructure.</p> <p>Elsewhere, a large portion of the south of the site is undevelopable due to flooding constraints. These sections of the site provide an opportunity for biodiversity net benefits through the provision of SuDS. Currently, the land is improved grassland and therefore there is a strong opportunity for a well-designed SuDS scheme to</p>	<p>Statement that fully considers the green infrastructure implications of the development.</p> <p>Continue engagement between the developer, the Council and NRW in order to ensure that green infrastructure is treated appropriately at the site.</p> <p>Establish the requirements and timescales for any protected species surveys that may be required.</p>
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<p>classified as endangered in the Red Data Book.</p> <p>This area is part of the Restore the Thaw project catchment area and so developing it is hypocritical to the council's commitment to deliver improvements to biodiversity in this area.</p>	<p>provide significant biodiversity net-benefits. There are no permanent ponds in the south of the site, one exists to the southeast of the site, and this is not a SINC.</p> <p>The remainder of the site is primarily improved grassland. It is acknowledged that the biodiversity and ecology value of such land is limited. Therefore, the loss of these portions of the site would not have significant implications for wildlife. In line with longstanding policy, hedgerows, trees and other natural features would be retained where possible. Whilst some trees may be required to be removed, through the provision of trees in areas of public open space, along travel routes, and in the area between the two SSSIs, it is likely that there will be a net gain in the number of trees on site.</p> <p>Green infrastructure implications will be treated through a Green Infrastructure Statement for the site. This will have to be submitted prior to the publication of the Deposit Plan, and will resolve outstanding issues relating to the SSSI, as well as identify where biodiversity net-benefits can be achieved.</p> <p>NRW have advised that discussions are undertaken with the Local Authority Ecologist to determine the scope of any additional European Protected Species surveys such as dormice, great crested newts and bats. If required, these will need to be undertaken at the appropriate time in the development process, as advised by the County Ecologist.</p> <p>The site is not within the 'Restore the Thaw' project catchment area.</p>	
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### **Pollution and Contamination**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>A portion of the site is contaminated.</p> <p>The loss of green infrastructure will negatively impact air quality.</p>	<p>The Council's Contamination Team have identified that it is likely that part of the site is contaminated but consider that this could be addressed by remediation to make the site suitable for use. In view of this they have set out several requirements that need to be met prior to the development of the site. It is considered suitable for these details to be considered in full at planning application stage.</p>	<p>The Council will ensure that land contamination issues are fully resolved prior to the determination of any</p>

	The loss of any green infrastructure at the site will be mitigated for through biodiversity net benefits. This will ensure that green infrastructure proportionate to that lost will be provided for on site.	planning applications at the site.
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**Issue: Impact on Agriculture**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The land currently hosts several agricultural businesses, primarily focusing on farming. The development of this land will result in job losses for the current farmers. This also conflicts with Objective 9.</p> <p>Food production displaced from this land will result in increased imports, which will be less sustainable.</p> <p>BMV land exists on the site and its loss is not acceptable.</p>	<p>As set out in the Green Infrastructure Assessment, 77.8% of the Vale of Glamorgan is agricultural land, amounting to 26,459 hectares. At 71.3 hectares this site in its totality amounts to 0.002% of the agricultural land within the Vale of Glamorgan, however, this does not consider that portions of the site are hedgerow woodland, and buildings, which would not be considered agricultural. Therefore, the loss of this land will have a negligible impact on the availability of agricultural land in the Vale of Glamorgan and resultantly food production and employment in agriculture within the Vale.</p> <p>Given the relatively limited loss of agricultural land in the context of the Vale as a whole it is not considered that these proposals would undermine employment in agriculture, and it is envisaged that if required ample alternative employment opportunities exist. Given that development would be unlikely to start for several years it is considered that sufficient prior warning can be given that future employment at the site is not secure.</p> <p>Predictive Agricultural Land Classification Maps identify that approximately 6.84 hectares of land on the site is Grade 3a BMV. This is under 10% of the site area. The area in question is also in the southern part of the site, which is not proposed for built development. As part of the evidence base for the Deposit RLDP, the site promoter will be required to provide an agricultural land assessment to consider the implications of the loss of this land.</p>	<p>The Council will ensure that an assessment of the BMV land at the site is submitted, and this will be considered accordingly.</p>

**'Openness'; Landscape/Countryside Impacts, Coalescence and Green Belt / Wedge**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
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<p>The development will result in coalescence between Dinas Powys and Barry, urbanising this area. There will be a loss of countryside character of the area. Cumulatively, the impacts of the development will conflict with Objective 7.</p> <p>The development will ruin an area of natural beauty.</p> <p>The development is in a green belt / green wedge, and these are designated to protect land from development pressure and coalescence.</p>	<p>The character of the countryside will inevitably change in this location as it will become urbanised. However, as this is an edge of settlement area it is already peri-urban with the A4231 abutting the site to the west, the Sir Richard Gwyn School to the south and Argae Lane to the east. Therefore, this isn't an isolated rural site. Given the limited availability of brownfield land the loss of countryside character would be an inevitability in meeting the housing requirement on any greenfield site chosen.</p> <p>There is a 'gap' of approximately 1km between the easternmost extent of the site and defined settlement boundary Dinas Powys. This land will ensure that a natural barrier exists between the two towns, protecting the settlements from coalescence.</p> <p>Unlike many other areas in the Vale of Glamorgan, this land has not been designated for the value of its landscape. The landscape value of the site is not therefore considered sufficient to pushback against development when balanced against the need to deliver the housing requirement.</p> <p>The site is not located within a green belt or a green wedge, in terms of the planning designation. There are no green belts within the Vale of Glamorgan, and these can only be established through the need for them being identified within Future Wales. Future Wales does not identify the Vale of Glamorgan as an area where a green belt should be considered. There are green wedges located within the Vale of Glamorgan, although not in this location between Dinas Powys and Barry.</p>	<p>N/A</p>
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**Capacity of Healthcare Services**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Local medical/GP practices, ambulances, dentists and other healthcare facilities are at full capacity. There is a lack of local GPs and NHS dentists. Waiting times for healthcare</p>	<p>The Council is liaising with Cardiff and the Vale University Health Board to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, CAVUHB will be able to plan for future service requirements and plan accordingly.</p>	<p>The Council will continue to liaise with CAVUHB.</p>

<p>services are unacceptable. The capacity issues that this site will only exacerbate conflict with Objective 2 of the Preferred Strategy.</p> <p>Capacity issues need to be addressed before development takes place through the provision of new facilities.</p> <p>A new GP practice would be required to deal with additional demand.</p>	<p>A portion of the site is identified for mixed use purposes, these may provide an opportunity for healthcare facilities to be delivered on site, if required. If healthcare facilities were provided on site then, as opposed to negatively impacting capacity, the site would facilitate increased capacity.</p>	<p>The Deposit Plan will be supported by a background paper which considers the impact of new development on health services and how this can be addressed.</p>
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### **Capacity of Education Services**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Schools and nurseries in the locality of the site are currently overcapacity and in recent years have been oversubscribed. The development of this site will only exacerbate this issue.</p> <p>Capacity issues need to be addressed prior to development.</p> <p>1 new primary school delivered on site will not be enough to deal with the additional demand.</p> <p>The new primary school will impact admissions at St Andrew's Major Primary School</p>	<p>The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly.</p> <p>The North East Barry site will safeguard land and secure a financial contribution for the delivery of a primary school on site, this will address the demand for primary school places that is generated from the site. Therefore, as opposed to negatively impacting primary school capacity, the site will increase provision. When projecting the number of pupils that will be generated from the site it is considered that a new primary school will address needs.</p> <p>The site is adjacent to St Richard Gwyn Catholic High School. Whilst it is recognised that not all parents would wish their children to attend a denominational school, there are plans for the school to be expanded in the near future and this could cater for some need. Opportunities for expansion of non-denominational high schools are currently being considered.</p>	<p>The Planning Department will continue to liaise with the Sustainable Communities for Learning Team.</p> <p>The Deposit Plan will be supported by a background paper which will consider the impact of new development on school capacity and how this can be addressed.</p>

	Through a Section 106 Agreement the development of educational facilities can be phased to align with sufficient residents moving on to the site, in order to address demand once it exists.	
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### **Capacity of Other Public Services**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Waste collection services are over capacity.</p> <p>Leisure facilities are over capacity.</p> <p>Police services are over capacity.</p>	<p>Waste generated from the site will be disposed of in line with Council Policy. There is no indication that capacity issues exist with this, and new provisions will need to be made to serve the site.</p> <p>Council owned leisure facilities will likely benefit from increased patronage from the influx of new residents at the site. There is no indication of a capacity issue in terms of leisure provision.</p> <p>In their representations to the Preferred Strategy South Wales Police have not identified any capacity issues.</p>	

### **Affordable Housing and the Barry / Dinas Powys Housing Market**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Barry is the Key Settlement in the Settlement Hierarchy, however, arguably this site serves Dinas Powys' housing demand.</p> <p>There will not be enough affordable housing provision at the site and young people / locals will not be able to afford the market housing. The failure to delivery affordable housing will conflict with Objective 3.</p>	<p>Fundamentally, the site is considered to serve housing demand in Barry. The site immediately adjoins the Barry settlement boundary, and its two main access will be onto the A4231, which exists between the current Barry settlement and the site. The site is considered to be a functional urban extension to Barry.</p> <p>Conversely, at its closest the site is located approximately 1km from the Dinas Powys Settlement Boundary as the crow flies. As set out above, the Council are considering limiting access from the site to Dinas Powys through the lanes that connect the two. Therefore, any journeys by car to Dinas Powys would have to take place by leaving the site in the direction of Barry. Whilst the site exists within the Dinas Powys electoral ward from a political geography perspective, functionally, the site will form a part of the Barry settlement.</p>	

<p>The site will be within the Dinas Powys affordable housing area but will have Barry affordable housing requirements.</p> <p>Empty homes should be filled first.</p> <p>Significantly smaller residential schemes have been refused planning permission for being outside of settlements.</p>	<p>As the site will serve the Barry housing market it is considered appropriate to require the levels of affordable housing currently required in Barry as a minimum (30%), subject to the findings of site-specific viability testing. Whilst the provision of this number, or even the whole site, as affordable housing would not meet the identified affordable housing demand in the Vale, the development at this site will go some way toward alleviating local need.</p> <p>It is acknowledged that bringing empty homes back into use is an important priority. There are over 500 long term empty homes in the Vale of Glamorgan. As set out in the RLDP Preferred Strategy, the Preferred Strategy is seeking to deliver 7,890 homes. Therefore, bringing back all empty homes into use would not achieve the delivery target. The Council are charging a 150% Council Tax premium on long term empty homes, and this is set to increase to 200% in 2025/2026. Therefore, efforts are being made to encourage these homes to be brought back into use.</p> <p>It is likely that smaller residential schemes outside of settlement boundaries have been refused planning permission. That is because they will have been considered against the adopted Local Development Plan or a previous iteration of the Development Plan relevant to the Vale. New housing should be directed to allocated sites and a purpose of the Local Development Plan is to allocate these sites. That is the process now taking place, and it includes North East Barry as a proposed allocation.</p>	
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**Location of Development**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The A4231 is a natural boundary for Barry and resultantly the site is divorced from the town and is akin to development in the countryside. The site should be located closer to a train station.</p>	<p>Barry is the most sustainable settlement within the Vale of Glamorgan by virtue of its services, facilities, employment opportunities and transport links. Therefore, a quantum of development proportionate to this needs to be located in Barry. Development sited here is closer to services than in other smaller settlements nearby, such as Sully, and the scale of the development allows for a greater amount of infrastructure to be provided through S106 contributions.</p>	<p>N/A</p>

<p>The development should be closer to a train station.</p> <p>The scale of this site takes housing away from other sustainable settlements in the locality, such as Sully.</p> <p>The site shouldn't be described as an extension to Barry as it is within the Dinas Powys Ward and specifically the locality of St Andrews Major. The Dinas Powys ward is getting a disproportionate amount of new housing.</p> <p>Development should take place on brownfield land first and there have been no attempts to site development there first. There is sufficient brownfield land in the Vale of Glamorgan and nearby Cardiff. The failure to prioritise brownfield land first conflicts with Objective 5.</p> <p>Housing should be closer to the M4.</p> <p>A self-contained development away from existing residential areas would be better.</p>	<p>When considering the constraints to development that exist within and surrounding Barry it is evident that this site is the least constrained site that could provide sufficient levels of new housing within the Barry locality. The site itself has limited physical and environmental constraints, and whilst those that do exist are being considered through this process, it is evident that a significant number of the housing requirement can be met on here. As set out in the transport section, the site is considered sufficiently close to public transport links, and services and facilities, to encourage sustainable transport. This is particularly the case when compared to alternative options within the locality, which are both located further from transport links and would deliver significantly less housing.</p> <p>Given the current layout of the A4231 it is understandable why this may seem a natural barrier to development for Barry. However, in developing the site it is anticipated that this issue would be overcome. Active travel routes are proposed east to west from the site and into Barry and the existing junction (at the intersection with Argae Lane) and roundabout (at the intersection with Gilbert Lane) are to be reconfigured to facilitate this. It is envisaged that the reconfigured junctions would prioritise active travel movements. To further improve accessibility into the site active travel routes are being considered along the A4231 and these would likely require the reconfiguration of the road to make it more pedestrian and cycle friendly, including the reduction of speed limits. Cumulatively, it is considered that these measures would act to integrate the site into Barry.</p> <p>It is apparent that the number of brownfield sites that are ready for housing development within the RLDP plan period is limited. No candidate sites were promoted on brownfield land in sustainable locations during the call for candidate sites that would be considered Key Sites in the RLDP. There are several smaller scale sites that may be allocated for housing; however, these alone would only meet a small portion of the overall housing target. Instead, in order to meet the housing requirement, development on greenfield land is required. As set out, this site is likely the least constrained within the Barry locality and therefore it is a reasonable location for development. A biodiversity net-benefit will be delivered through the development and therefore harm to the natural environment will be avoided.</p>	
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	<p>As set out in relation to the Barry / Dinas Powys affordable housing market issue, the site is considered functionally a part of Barry, and it will serve Barry's affordable housing market. Therefore, it is reasonable to refer to the site as an extension of Barry.</p> <p>The M4 corridor is not considered a suitable location for development in the Vale of Glamorgan and significant residential development in this locality would not comply with our spatial strategy, or national planning or transport policy, which seeks to focus new development in sustainable locations well served by public transport. M4-based development would be inherently car focused. The communities in the Vale of Glamorgan sited near to the M4 are rural hamlets and villages with poor service provision and limited facilities. The area is also poorly served by public transport. It is not considered that new development at a scale to meet the housing requirement set in the RLDP would be suitable in the area along the M4 corridor and resultantly this was not considered as a spatial option for the Preferred Strategy.</p> <p>New settlements, as suggested should be considered by some respondents, cannot be delivered through Local Development Plans and paragraph 3.53 of Planning Policy Wales (Edition 12) rules these out.</p>	
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**Health and Wellbeing**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The proposed development will reduce the living standards of existing residents.</p> <p>The development will remove land, accessible by public rights of way, that is used by residents to exercise and relax, impacting their mental health. This will conflict with objective 2.</p>	<p>Currently, the majority of the site is privately owned farmland and small parts of this are only accessible by poorly maintained public rights of way, none of which are paved. Notwithstanding the wellbeing benefits for future users associated with homeownership, the development of this land will significantly increase public access to this parcel of land. The development will open up the site to public access allowing access for all through public areas, massively improving the physical health benefits of the site. Through designing high quality areas of public open space, the opportunity also exists to create restorative places that will provide benefits to mental wellbeing as well.</p>	<p>N/A</p>



<p>There will be an increase in crime.</p> <p>There will be nuisance, congestion, and safety issues caused by construction at the site.</p> <p>Development on the site will impact on the privacy of existing neighbours that adjoin the site.</p>	<p>It is likely that nuisance and congestion will result from the development of the site. This is to be expected in all construction operations and would be an issue wherever development to meet the housing requirement was directed. The impacts of this can be controlled at the planning applications stage through Construction and Environmental Management Plans.</p> <p>The introduction of this housing may increase crime in the locality as the area to the east of the A4231 does not currently have a very high population. However, this would be the case wherever new development is sited. There is no reason to believe crime rates would be any higher than normal and this would not be a reason to object to the development. A key part of placemaking is ensuring new developments are safe through good design.</p> <p>It is accepted that new housing will change the character of the locality for existing residents, and there will be more people in the area. However, any issues of privacy, such as overlooking from the site, will be addressed at planning application stage and privacy standards will be maintained in line with established amenity standards.</p>	
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**Impact of the development on Dinas Powys and St. Andrews Major**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The development will detriment the rural village character of Dinas Powys. Cumulatively with the development to the North of Dinas Powys, this development will remove the village status of Dinas Powys and turn it into a town. This will erode the community feel of the village and conflict with Objective 4.</p> <p>The development is not proportional to the scale of Dinas Powys, which is</p>	<p>As set out, the site is functionally a part of Barry despite being sited within the Dinas Powys Ward and it is located approximately 1km away from the Dinas Powys settlement boundary. The Council are considering options for limiting travel between the site and Dinas Powys along the lanes between the site and the settlement. Therefore, future residents of the site would not be able to travel to Dinas Powys along these lanes and the only access would be through active travel modes. Therefore, it is unlikely that the site would have an impact on the character of Dinas Powys.</p> <p>Notwithstanding this, it is not considered that new development in the locality would detriment it. New development would improve the viability of existing</p>	

<p>already over developed, and had three allocations in the current LDP (2017-2026).</p> <p>The development will engulf St Andrews Major and destroy the character of this community.</p>	<p>businesses and allow more to become established, by virtue of increased potential patronage.</p> <p>It is accepted that this site brings urban form significantly closer to the hamlet of St. Andrews Major. Albeit there would still be some set off between the hamlet and the site of approximately 500 metres. Fundamentally, St Andrews Major wouldn't be changing or seeing any new development itself; it would still function as a small hamlet. Potential restrictions to the Argae Lane would also reduce traffic running through the hamlet.</p>	
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**Deliverability**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Land ownership raises concerns about the deliverability of the site. The land is split between many landowners, and it is understood some have not agreed to sell.</p> <p>The site is not in the control of a single landowner.</p> <p>Due to the scale of the site, and issues associated with large scale strategic sites, 900 houses may not be deliverable in this Plan period</p>	<p>Deliverability is an important factor in justifying the inclusion of a site for allocation and the sites ownership is an integral part of this. The site promoter has provided evidence to the Council in the form of statements of intent from the majority of site owners, which provides assurance that site ownership is not an issue. Further certainty on this matter will be available by Deposit Plan Stage. It is likely that several dwellings in the north east of the site may need to be removed from the site boundary to fully resolve this issue. However, this portion of the site is not considered integral to the development of the site and only facilitates a small amount of the overall developable area.</p> <p>The developer has advised that 900 dwellings is an achievable target, similar numbers of dwellings per year have been achieved on other strategic development sites in the Vale of Glamorgan, namely the Barry Waterfront, and therefore this is considered achievable. Significant upfront work is taking place to ensure that significant issues are dealt with prior to the adoption of the RLDP. It has been advised that an RSL partner may be required, and this would also expedite the build out rates.</p> <p>In the lead up to the Deposit Plan, the Council will hold a housing stakeholder group to agree the housing trajectory for the site with the development industry.</p>	<p>Seek to agree delivery rates with the development industry through the housing stakeholder group process.</p>

### **Section 106 and Infrastructure Contributions**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Developers have a poor track record of delivering Section 106 contributions in the Vale of Glamorgan and this will continue to be the case on this site.	<p>In the 5 financial years up to April 2023 (not including 2023-2024) following the adoption of the Adopted Local Development (2011-2026) the Council received £30,198,719 in Section 106 contributions. In 2022/2023 £6,204,869 was spent on schemes. Therefore, the Council has received and spent significant amounts of S106 contributions since the plan was adopted.</p> <p>In order to evidence that sites are deliverable it will have to be evidenced that they are viable, and this would have to consider S106 contributions. If it transpires that sites are no longer viable following approval, the Council have the opportunity to dispute this and if required refuse planning permission. If developers fail to meet their planning obligations in pre-agreed timelines the Council retain the ability to take legal action.</p>	

### **Miscellaneous issues**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Development will impact property values.</p> <p>This is a money-making scheme between the Council and the developer.</p> <p>The Council want the houses to benefit from more Council Tax.</p> <p>Profits from the development will leave the UK.</p>	<p>It is a long-standing principle in UK land use planning that impacts to home values are considered a private matter that cannot act as a barrier to development.</p> <p>The Council are not promoting this site and would not see any profit from the development. The Council Tax generated from the site is not a reason for justifying the development. The development is justified based on meeting the housing requirement in a manner that accords with the Preferred Strategy.</p> <p>The developer's profits are not a concern of the RLDP.</p>	

### **Issue: Climate Change**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
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<p>The proposals are against the Council's declared climate emergency. Mitigating climate change should be prioritised over new development and the loss of greenfield land. The carbon budget does not exist to be constructing any new development.</p> <p>New development will consume more energy, emitting more greenhouse gases. New homes should include low carbon technologies including heat pumps and solar panels.</p>	<p>Mitigating the causes of climate change is integral to the RLDP and this is reflected throughout the Preferred Strategy. The strategy seeks to mitigate the impact of future planned growth through concentrating this growth within settlements that offer good public transport connectivity. The plan also contains a number of policies aimed and ensuring future growth incorporates active travel and green infrastructure, that homes built to high sustainability credentials, and ensure that appropriate measure are taken to reduce and mitigate the risk of flooding. Through this approach it is considered that an appropriate balance has been achieved between meeting the housing requirement and mitigating the impacts of climate change.</p> <p>Particularly, in relation to new homes and buildings generally, the Council are investigating the production of planning policy that seeks to ensure these are low carbon, through a fabric first approach. Subject to viability, it is anticipated that this policy will require new buildings to be net zero in their operation.</p>	
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**Miscellaneous On-Site issues**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The site is not served by gas or electricity mains.</p> <p>The site is within a mineral safeguarding area.</p> <p>The active travel route along the trainline would not be possible as a lot of it is located on private land that is not included within the development site.</p>	<p>National Grid Electricity Distribution and Wales and West Utilities have been made aware of the proposed allocation of these sites and will have to ensure that capacity exists prior to development taking place. The developer will be responsible for ensuring that the site is capable of making connections to utilities. Given anticipated changes to Building Regulations and the Council's investigation of net zero building planning policy, it may be that no gas connection is required.</p> <p>Given the proximity to Barry and residences along the Argae Lane, as well as on the site and the existence of the SSSI to the north of the site, it is unlikely that this site would be appropriate for mineral extraction. Therefore, the fact that the site is within a mineral safeguarding area is not an insurmountable constraint.</p> <p>The developer would not be able to install an active travel access across private land not in its control. If the disused rail line is not brought into the control of the developer or potentially the Council, then it would not be possible to develop the</p>	

	active travel route along it. This is not considered integral to the allocation of the site. The developer is in discussions with the landowners regarding the southern part of the disused rail line.	
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**SP4 KS2 Land North of Dinas Powys**

**NRW Response (Letter Dated 15/11/23 Referred to in PS Rep)**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p><b>Protected Sites, Biodiversity and Protected Species</b></p> <p>Whilst there is limited data available regarding habitats present within this proposed allocation, we are aware of at least one field in this location which supports high quality, species rich, semi natural grassland habitat. Review of aerial photos also appear to show other significant areas of similar habitat. The site is also known to support significant and well-developed hedgerows that contribute to the woodland connectivity. With this in mind, we recommend that Preliminary Ecological Assessments are undertaken before any firm proposals for allocation are taken forward. Overall, given this allocation potentially supports important habitats and environmental features, we consider that further information is required to assess the suitability of this area for development.</p> <p><b>Flood Risk</b></p> <p>We welcome from the illustrative layout that development will be limited to the southern part of the site and no</p>	<p>The Council are in receipt of a Preliminary Ecological Assessment for the site, and this can be made available for review. The Council consider that this has informed the layout of the site and has resulted in development being directed away from the most ecologically important areas of the site. The Council are keen to engage with NRW and the developer to address any concern that may exist.</p> <p>In relation to flooding, comments are noted. The Council view the development of the site as an opportunity to enable collaborative work between NRW and the developer in relation to flooding in the Cadoxton catchment area and will seek to engage both parties on this.</p>	<p>The Council will provide NRW with the PEA for this site in order for them to review and work with NRW and the developer to address any issues relating to protected sites, biodiversity and protected species.</p> <p>The Council will seek to engage with NRW and the developer in order to understand whether opportunities exist to align NRW's plans for river restoration in the Cadoxton catchment area with the development of the site.</p>

<p>development is proposed within the flood plain. We note that the site sits within the catchment of the Eastbrook and Cadoxton Rivers and are aware of historic flooding downstream from this site. NRW are currently in the process of commissioning a strategic river restoration plan covering the Cadoxton and its primary tributaries which will identify pressures, impacts and opportunities for river restoration delivery which we would be happy to share once completed.</p>		
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**DCWW Response**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p><b>Water supply:</b></p> <p>A HMA will be required to establish the impact of the proposal on the existing water network and potential developers would be expected to fund investigations during pre-planning stages.</p> <p>A 18" diameter watermain crosses this site. Potential developers need to be aware that an easement width would be required which may impact upon the development density achievable on site.</p> <p><b>Public sewerage networks</b></p>	<p>Thank you for your comments these are noted.</p>	<p>The Council will relay the responsibilities set out by DCWW to the Developer.</p>

<p>The public sewerage network is expected to be able to accommodate foul flows from this site.</p> <p>A 1450mm diameter sewer crosses the site and potential developers need to be aware that an easement width would be required which may impact upon the development density achievable on site.</p> <p><b>WwTW</b></p> <p>The site falls within the catchment area of Cog Moors Wastewater Treatment Works (WwTW) which has capacity to accommodate the domestic foul flows from this site.</p>		
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**Issue: Highways and Transport Concerns**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p><b>Highways Issues</b></p> <p>The scheme will add more cars to the road and reinforce car usage. This conflicts with the ISA and Objective 1 of the Preferred Strategy.</p> <p>Cardiff Road and several junctions in the locality and junctions (Dinas Powys Primary School, Merrie Harrier, Cogan Spur) in the locality of the site and between the site and Cardiff that are at capacity. At rush hour these roads are</p>	<p>It is acknowledged that new development may generate an element of additional traffic. However, there is a requirement that the RLDP makes provision for housing and the implications of additional traffic must be balanced against this. As shown in the Stage 1 Strategic Transport Assessment, which largely uses pre-pandemic data there are junction capacity issues in several locations within the Vale of Glamorgan. This isn't an issue localised to the areas where new allocations are being proposed, and the introduction of new housing in any location within the Vale would likely exacerbate current issues.</p> <p>A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan. This will include updated data, which will take into account post-pandemic travel patterns. This will also identify any mitigation that may be required to reduce the impact of the additional traffic from the sites.</p>	<p>The Council will publish a Stage 2 Strategic Transport Assessment alongside the Deposit Plan</p> <p>The Council will work with the developer to ensure that a safe access and egress to the</p>



<p>significantly congested and these proposals, including the introduction of a new junction from the site onto Cardiff Road, will only exacerbate problems, including ambulance response times.</p> <p>Cardiff Road is unsafe to cycle along, and these proposals would add cars that will further make this unsafe.</p> <p>This scheme should not be allowed to go forward until such a time as a bypass has been built around Dinas Powys. A bypass is required to deal with additional car journeys.</p> <p>The proposed scheme will increase the number of journeys along Pen-Y-Turnpike Road, which is already a rat run and is unsafe.</p> <p>A new junction on Cardiff Road would exacerbate existing congestion issues.</p> <p>Highways improvements should take place before development commences.</p> <p>There are currently car parking issues in Dinas Powys, and these proposals will exacerbate them.</p> <p>Car parking provision at Eastbrook Station is limited.</p>	<p>A bypass is not currently being considered for Dinas Powys, as such as proposal would encourage the use of the car, contrary to national planning and transport policies.</p> <p>To mitigate against the harm of additional traffic, sites, including Land North of Dinas Powys, have been selected to reflect the chosen spatial option for the Preferred Strategy, which sought to site new development in the most sustainable transit-oriented locations. This strategy seeks to reduce the need to travel and where journeys need to be made site new development in proximity to sustainable transport nodes, prioritising the provision of active travel links. The Council will also consider car parking provision at the site and whether lower requirements would be acceptable in order to promote modal shift.</p> <p>When considering the sites submitted through the RLDP Call for Candidate Sites, and the quantum of new housing that needs to be delivered, it was considered that this site was appropriate due to its close proximity to Eastbrook Train Station and other services and facilities in Dinas Powys and to a lesser extent Penarth and Llandough.</p> <p>Aside from a small tract of the site at its most eastern extent the site is currently located wholly within a ten-minute walk of Eastbrook Train Station. When active travel provision has been made on site the whole site would be within a ten-minute walk. These short distances mean that the site provides a strong opportunity for modal shift as it is likely residents would choose to travel on the train if their destination was east or west along the Vale of Glamorgan Line.</p> <p>A priority in developing the site would be to improve accessibility to the train station. There are several possible pedestrian routes to the station, both along Cardiff Road and from existing paths that lead to Highfield Close and Chapel Close and then onto Cardiff Road. Opportunities to introduce cycle links have not been explored as of yet, however, improved cycle provision would have to be facilitated as part of the delivery of the site.</p>	<p>site can be provided from Cardiff Road.</p> <p>The Council will with the developer to identify where cycle links can be made to Eastbrook Train Station.</p> <p>The requirement for an Air Quality Impact Assessment to be undertaken as part of a planning application will be identified in the Deposit RLDP.</p>
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<p>More cars coming from the site will create more air pollution in the locality.</p> <p>Could the development site and the wider green wedge area between Dinas Powys and Llandough be used to site a wider road and decongest Cardiff Road.</p> <p><b>Sustainable Transport</b></p> <p>These proposals conflict with Llwybr Newydd and its modal shift aspirations. Future residents will likely drive from the site as it is the most convenient mode. Accessibility from the site to Eastbrook Train Station is not sufficient and there needs to be improvements to Highfield Close, Georges Row and Chapel Row if these are to be used for active travel connections to the train station. There is no lift for people with mobility issues to cross the platform. For these reasons, the development conflicts with Objective 8.</p> <p>The site is not currently accessible by active travel and any existing routes are unsafe.</p> <p>Trains that serve Eastbrook Train Station are at full capacity at peak times and it is not apparent that additional capacity will be added.</p>	<p>Eastbrook Train Station is served by 31 car parking spaces which provides a degree of car parking provision likely commensurate to the scale of the station and the catchment area it serves (particularly considering Dinas Powys and Cogan Train Stations are located in close proximity). Notwithstanding potential provision issues at the Station, it is considered that the majority of residents would choose to travel there using active travel instead of driving.</p> <p>It is acknowledged that accessibility at Eastbrook Train Station itself is poor given the absence of a lift. As the station is managed by Transport for Wales this would be their responsibility. However, this does not undermine the fact that this is a station in close proximity to the site that will offer an alternative to journeys by car for some residents.</p> <p>It is appreciated that trains travelling along the Vale of Glamorgan Line are currently well used during peak times. TFW have committed to introducing additional services at peak times and they will also be introducing new trains to the Line with increased capacity.</p> <p>No access under the proposed allocation exists onto Pen-Y-Turnpike Road, and instead the site access would be onto Cardiff Road. It is anticipated that drivers would choose to travel from the site, along Cardiff Road, and onto Cardiff either via the Cogan Spur or Llandough, rather than back on themselves and via Pen-Y-Turnpike Road. Therefore, it is not believed that this would cause any issues along the road to be exacerbated.</p> <p>The widening of Cardiff Road using the site and the green wedge between Llandough and Dinas Powys is not currently being considered. Generally, it is not considered that expanding road widths deals with capacity and instead induces greater demand resulting in equal congestion. To induce more demand would conflict with key principles of the Strategy.</p> <p>A detailed transport assessment will be required to consider and understand the impact of additional traffic on the existing network and identify potential highway improvements and mitigations to traffic flows.</p>	
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<p>Inadequate cycle paths delivered between settlements in Dinas</p>	<p>It is anticipated that sufficient car parking provision will be provided on site so as not to exacerbate any potential car parking issues in the locality of the site. Furthermore, the site has been selected due to its close proximity to sustainable transport nodes and it is anticipated that this would reduce the need to travel and for car ownership.</p> <p>Nitrogen dioxide levels are extensively monitored in Dinas Powys (as well as other areas within the Vale of Glamorgan). Whilst less likely to be an issue, PM2.5 and PM10 will also be monitored soon in the settlement. The most recent reporting of nitrogen dioxide data identified that all monitoring locations within Dinas Powys were well within the legal limits for nitrogen dioxide (<a href="#">APR VOG 2023 (srs.wales)</a><sup>1</sup> – see page 24). Prior to the determination of any planning application at the sites Air Quality Assessments would have to be carried out that would investigate the implications of air pollution on the site and resulting from an increase in car journeys from the site. Appropriate mitigation can be put in place at that time to address any potential issues.</p> <p>Agreed improvements to the highway network, including the provision of active travel routes, will be phased as the development comes forward. This will be controlled by a legal agreement. Safe access and egress from the site, likely including the installation of a junction onto Cardiff Road, would have to take place early in the development of the site in order to allow access.</p> <p>The Council will be publicly consulting on the proposed active travel route from Barry to Dinas Powys in the summer of 2024. Over the last 12 months the preferred route, as chosen by public consultation in 2022, has been subject to detailed ecology surveys and has involved flood modelling and consultation with Natural Resources Wales, to understand the impact of any proposal. It is envisaged that the survey and modelling work will return a favourable result and once the detailed design is completed, a construction funding application will be made to Welsh Government.</p>	
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<sup>1</sup> Accessed 15/04/24.

**Conformity with Preferred Strategy**

Issue raised	Council response	Action
<p>The site does not conform with the RLDP Vision.</p> <p>The site does not conform with LDP Objectives.</p> <p>The site contradicts the Preferred Strategy as it does not align new housing development with employment. This conflicts with Objective 7.</p> <p>The Preferred Strategy identified that sites will be small scale and affordable housing led. This site is neither.</p> <p>The Proposals conflict with the candidate site methodology.</p>	<p>The Council strongly believe that the site aligns with the Preferred Strategy. With regard to the Vision, an integral part is housing growth that delivers homes for all. The purpose of this is to meet the high housing demand, which is particularly acute in the Dinas Powys and south eastern Vale area. This site contributes toward meeting the residential requirement identified in the Preferred Strategy. Fundamentally, without the delivery of housing the intention of the Vision cannot be achieved. Ultimately, that delivery does lead to the need for issues to be balanced in some cases. However, through aligning with the drafted strategic policies within the Preferred Strategy and national planning policy, particularly on placemaking, it will be ensured that the site conforms with the Vision in its entirety.</p> <p>Key element 4 of the Preferred Strategy is: <i>Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement.</i> This is one of 6 key elements that comprise the Preferred Strategy. Evidentially, this does not apply to this site, or any of the other Key Sites. As set out in the Preferred Strategy this key element exists to allow for the provision of affordable housing in less sustainable locations than those within the Strategic Growth Area. There will however be a requirement for a percentage of the site to be affordable.</p> <p>Similarly, aligning new housing with employment is also a part of key element number 2, although this key element is broader, as follows: <i>Aligning locations for new housing, employment, services and facilities to reduce the need to travel.</i> As set out, this site is located in close proximity to services and facilities within Dinas Powys, which would reduce the need to travel. Albeit there are limited employment opportunities in the settlement and no allocated employment sites. Notwithstanding this, this site has also been selected due to its close proximity to existing rail stations, in line with key element number 3 of the Preferred Strategy: <i>Focusing development in 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.</i> As set out in the Highways and Transport section, the site is located almost wholly</p>	

	<p>within a 10-minute walk of Eastbrook Train Station and this makes it a highly sustainable location, where new development should be directed.</p> <p>The site is considered to comply with the candidate site assessment methodology as identified within the Candidate Site Assessment at Preferred Strategy (<a href="#">Rotated BP18 Candidate Sites Assessment at Preferred Strategy stage - Final.pdf (oc2.uk)</a><sup>2</sup> – see page 35).</p>	
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### **Conformity with Council Policy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The proposals do not align with corporate Council Policy, including the Corporate Plan 2020-2025, which states that an aim is to ‘respect, enhance and enjoy our environment’.</p>	<p>As set out in BP4 ‘Assessment of the Preferred Strategy Against the Tests of Soundness’ the Preferred Strategy is considered to align with key Council corporate policy including the Wellbeing Plan 2023 – 2028 and the Corporate Plan 2020 – 2025.</p> <p>The Well-Being Plan and associated wellbeing assessment was integral in identifying the key issues to be addressed in the RLDP and which were considered when drafting the Vision and Objectives.</p> <p>The Strategy is also informed by the Council’s Corporate Plan and the challenges identified within this, including to respect, enhance and enjoy our environment. The proposed allocation of this site visibly aligns with this objective as development will create a vastly greater area of publicly accessible open space when compared to existing accessibility to the site, allowing for greater enjoyment. Through delivering biodiversity net-benefits the development will also respect and enhance the environment.</p>	<p>N/A</p>

### **Flooding and Drainage**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>There have been bad floods within Dinas Powys in recent years: along the</p>	<p>It is acknowledged that significant concern was raised in relation to the implications of flooding. The developer has produced a high-level Flood Risk and</p>	<p>The Council, including the SuDS</p>

<sup>2</sup> Accessed 15/04/24.

<p>Eastbrook; along the Cadoxton; and at the bottom of Pen Y Turnpike Road. Over 100 homes were flooded in 2020. The flooding issues also have knock on effects for businesses on the employment sites in Barry Docks. Further development would exacerbate issues associated with this, and conflicts with the ISA and Objective 1 of the Preferred Strategy.</p> <p>The site has been known to flood, can be boggy and has large drainage ditches. The site currently holds water out of the Eastbrook but if the site is built on water would drain into it quicker. The loss of natural drainage features will mean less penetration on site, and this will exacerbate flooding issues in the locality. No evidence has been supplied showing an appropriate drainage strategy is in place for the site.</p> <p>New development elsewhere in the locality has already contributed to worse flooding.</p> <p>NRW have objected to the scheme due to implications for flooding, communicating as much at a recent meeting.</p>	<p>Drainage Assessment, and this concludes that development of the site would not be prejudiced by flooding or drainage issues. Prior to the allocation of the site the Council's Drainage Team and NRW will have to be satisfied that the drainage and any flood mitigation measures proposed on site are sufficient to deal with the associated risk. A Strategic Flood Consequences Assessment has been carried out which reviewed the implications of flooding across the Vale of Glamorgan. This work informed site selection and meant that development could be directed away from the areas where greatest flood risk exists.</p> <p>The Eastbrook runs through the east of the site, with smaller tributaries running west-east across the site feeding into it. The area immediately surrounding the Eastbrook and the southernmost sections of the tributaries running into it are identified as within flood zone 3. The access into the site would have to cross the Eastbrook and in view of this safe access and egress onto the site would have to be evidenced prior to the allocation of the site through a Flood Consequences Assessment. There are areas of surface water and small watercourse flooding across the site, primarily along the courses of the Eastbrook tributaries.</p> <p>Since 2019 Sustainable Drainage Systems (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 detriment offsite. Therefore, the proposed development would not exacerbate flood risk off site.</p> <p>The developers Flood Risk and Drainage Assessment identifies that NRW have previously considered the introduction of natural flood management measures along the Eastbrook. It may be that this development provides the grounds to progress this work, particularly within the site boundary. The purpose of this would be to reduce the risk of flooding within Dinas Powys, along the Eastbrook. Therefore, through the installation of an appropriate SuDS scheme the site will not</p>	<p>Approval Body, will work with the developer and NRW to ensure that that flood risk both on and offsite is appropriately managed.</p> <p>The Council will liaise with NRW and the developer in order to understand whether the development of the site can be used as an opportunity to introduce natural flood management along the Eastbrook within the site boundary.</p>
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	<p>further exacerbate flooding issues in Dinas Powys and it may be through facilitating natural flood management interventions along the Eastbrook it is possible to alleviate flooding issues within Dinas Powys. However, the latter would be subject to further investigation and engagement between the Council, NRW and the developer.</p> <p>In their formal response, as set out above, NRW have not objected to the identification of this site in relation to flooding.</p>	
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### **Sewage/Sewerage and Capacity of Facilities**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The Cog Moors Wastewater Treatment Works are over capacity and more sewage will result in overflows from the works, resulting in waste going into nearby rivers and seas.</p> <p>More sewage connections to the Cog Moors Wastewater Treatment Works will decrease the capacity for storm water, increasing the flood risk in the locality of the site.</p>	<p>The Council work closely with Dwr Cymru Welsh Water in respect of the development plan and Welsh Water input into the process to ensure that the allocations coming forward in the plan do not give rise to issues with the existing sewerage network. Where issues are raised developers will be required to deliver upgrades to the system in order to allow development to proceed.</p> <p>In relation to the Cog Moors Wastewater Treatment Works DCWW have advised that sufficient capacity exists to make connections from this site without the need for expansion.</p>	

### **Green Infrastructure**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The development will have an unacceptable impact on ecology and biodiversity at the site. The site is known to host a wide range of flora and fauna. The Nature Emergency should</p>	<p>National planning policy and proposed policy within the RLDP on green infrastructure is strong. Any future development at the site would have to comply with this and resultantly it is considered that a suitable scheme that protects key green infrastructure features and provides a biodiversity net benefit can be achieved.</p>	<p>Ensure the developer submits a Green Infrastructure Statement that fully considers the green infrastructure</p>

<p>take priority. Cumulatively, this will conflict with Objective 5.</p> <p>The loss of the green corridor from Dinas Powys to Llandough is unacceptable.</p> <p>Ponds and the river channels that run through the site have high ecological.</p> <p>The development will have an impact on protected species.</p> <p>Loss of tree coverage is contrary to Welsh Government targets for tree planting and the forthcoming Council Tree Strategy.</p> <p>The loss of green infrastructure will negatively impact air quality.</p> <p>Wildlife including owls, bats, mice, rabbits, newts, foxes, and a range of birds have been sighted on the site.</p>	<p>Whilst it is acknowledged that the development will result in the loss of green infrastructure, as justified elsewhere, potential harm has to be balanced against allocating sites to meet the housing requirement. The original candidate submission for the North of Dinas Powys site was significantly larger, encompassing almost all of the land between Dinas Powys and Llandough. In part due to the impact that development would have here on green infrastructure, including biodiversity and ecology, it was not considered appropriate to identify the whole site for allocation. Resultantly, the site was rationalised to its current boundaries.</p> <p>Broadly, the site allocation will set out what green infrastructure at the site will be protected and where biodiversity net-benefits will be achieved. More detail on this will be drawn out during planning applications for the site. However, at this stage principles for protection and net-benefits at the site have been established.</p> <p>A preliminary ecological assessment has been received for the site and it is evident that this has been used to inform the indicative site layout, with development being directed away from woodland, including the designated ancient woodlands, and hedgerows on site. Buffer zones have also been identified around these areas of high ecological value. The site is important for biodiversity connectivity in the area between Dinas Powys, Llandough and Pen-Y-Turnpike and beyond. The proposed site layout currently identifies green infrastructure corridors, and they will be developed, in terms of the protection they will be given, prior to the publication of the Deposit Plan. In most cases these corridors follow watercourses, which have high ecological value in themselves, and development would not be possible in these areas in any case due to flooding constraints.</p> <p>In line with longstanding policy, hedgerows, trees and other natural features would be retained where possible. Whilst some trees may be required to be removed, through the provision of trees in areas of public open space and along travel routes it is likely that there will be a net gain in the number of trees on site. In an area to the east of the site, adjacent to Cardiff Road, a diverse ecological habitat buffer is proposed. This area provides an opportunity to achieve biodiversity net benefits, creating a rich habitat where semi-improved grassland currently exists.</p>	<p>implications of the development.</p> <p>Continue engagement between the developer, the Council and NRW in order to ensure that green infrastructure is treated appropriately at the site.</p> <p>Establish the requirements and timescales for any protected species surveys that may be required.</p>
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	<p>Green infrastructure implications will be treated through a Green Infrastructure Statement for the site. This will have to be submitted prior to the publication of the Deposit Plan, and will resolve outstanding issues relating to the SSSI, as well as identify where biodiversity net-benefits can be achieved.</p> <p>The Local Authority Ecologist will advise on the scope of any additional protected species surveys that would be required. If required, these will need to be undertaken at the appropriate time in the development process, as advised by the County Ecologist.</p>	
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**Issue: Impact on Agriculture**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The land currently hosts several agricultural businesses, primarily focusing on farming. The development of this land will result in job losses for the current farmers. This also conflicts with Objective 9.</p> <p>Food production displaced from this land will result in increased imports, which will be less sustainable.</p> <p>BMV land exists on the site and its loss is not acceptable.</p>	<p>As set out in the Green Infrastructure Assessment, 77.8% of the Vale of Glamorgan is agricultural land, amounting to 26,459 hectares. At 12.7 hectares this site in its totality amounts to a negligible amount of the agricultural land within the Vale of Glamorgan, however, this does not consider that portions of the site are hedgerow, woodland and buildings which would not be considered agricultural. Furthermore, none of the site is identified by Predictive Agricultural Land Classification mapping to be best and most versatile agricultural land. Therefore, the loss of this land will have a negligible impact on the availability of agricultural land in the Vale of Glamorgan and resultantly food production and employment in agriculture within the Vale.</p>	N/A

**'Openness'; Landscape/Countryside Impacts, Coalescence and Green Belt / Wedge**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The development will result in coalescence between Dinas Powys and Llandough, urbanising this very</p>	<p>The character of the countryside will inevitably change in this location as it will become urbanised. However, as this is an edge of settlement area it is already peri-urban with Cardiff Road adjoining the site to the east and the urban fringe of</p>	<p>The Council will conduct a review of Green Wedges,</p>

<p>sensitive area. There will be a loss of countryside character of the area. Cumulatively, the impacts of the development will conflict with Objective 7.</p> <p>The development is in a green belt / green wedge, and these are designated to protect land from development pressure and coalescence.</p>	<p>Dinas Powys existing to the south. Therefore, this isn't an isolated rural site. Given the limited availability of brownfield land the loss of countryside character would be an inevitability in meeting the housing requirement on any greenfield site chosen.</p> <p>It is acknowledged that the site is located both within a Special Landscape Area (SLA) and a Green Wedge. As set out, the original candidate site submission encompassed almost the whole area between Llandough and Dinas Powys. However, due to the SLA and Green Wedge designations, as well as the impact on green infrastructure, it was not considered suitable to allocate this whole area and the site was rationalised to its current boundary.</p> <p>With regards to the SLA, the site promoter has prepared a Landscape Summary, which considered the implications of developing the site in the SLA. This found that the standard of landscape sensitivity across the site was split into three, with two areas being of 'least sensitivity' and 'lower sensitivity' and one area being 'most sensitive'. The two areas of least and lower sensitivity are where development would be taking place. The area of most sensitivity is to the east of the site and no development will be taking place here. The study concludes that the proposed allocation is contained to a small portion of the SLA and that development in these two areas of lower sensitivity are capable of absorbing some change without prejudicing the wider SLA.</p> <p>None of the Vale is identified as green belt land, which is a specific planning designation designed for the long-term protection of land. Future Wales sets out the need for the Strategic Development Plan to identify a green belt in the Cardiff Capital Region, however the potential area does not include land in the Vale.</p> <p>The site is within a Green Wedge, which is a local designation that is reviewed as part of the development plan process. This review of Green Wedges will be taking place ahead of the publication of the Deposit Plan and this will fully detail the justification for excluding the site from the Green Wedge. Notwithstanding this, when viewing the Key Elements of the Preferred Strategy, the need to deliver the housing requirement, and the housing demand in this locality, it is evident that this is an appropriate site for urban expansion. Land will remain undeveloped between</p>	<p>which will justify amendments to boundaries, including at this site.</p>
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	Dinas Powys and Llandough, which will protect against coalescence and protect the countryside in this location. Therefore, the incursion into the Green Wedge is considered justifiable.	
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### **Capacity of Healthcare Services**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Local medical/GP practices, ambulances, dentists and other healthcare facilities are at full capacity. There is a lack of local GPs and NHS dentists. Waiting times for healthcare services are unacceptable. The capacity issues that this site will only exacerbate conflict with Objective 2 of the Preferred Strategy.</p> <p>Capacity issues need to be addressed before development takes place through the provision of new facilities.</p>	<p>The Council are liaising with Cardiff and the Vale University Health Board to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, CAVUHB will be able to plan for future service requirements and plan accordingly.</p>	<p>The Council will continue to liaise with CAVUHB.</p> <p>The Deposit Plan will be supported by a background paper which considers the impact of new development on health services and how this can be addressed.</p>

### **Capacity of Education Services**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Schools and nurseries in the locality of the site are currently overcapacity and in recent years have been oversubscribed. The development of this site will only exacerbate this issue.</p> <p>Capacity issues need to be addressed prior to development.</p>	<p>The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly. The Council are currently considering options to address the increased number of pupils that will come from this and all other Key Sites. There are currently no proposals to locate a primary school on the site and it is likely that the scale of the reduced site would not lend itself to as much.</p>	<p>The Planning Department will continue to liaise with the Sustainable Communities for Learning Team.</p> <p>The Deposit Plan will be supported by a background paper</p>

<p>Could Dinas Powys Primary School be relocated to the site or the wider green wedge area between Dinas Powys and Llandough</p>	<p>The development will be required to make a contribution towards Education, which will be used to increase capacity in local schools as necessary.</p>	<p>which will consider the impact of new development on school capacity and how this can be addressed.</p>
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**Capacity of Other Public Services**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Waste collection services are over capacity.</p> <p>Leisure facilities are over capacity.</p> <p>Police services are over capacity.</p>	<p>Waste generated from the site will be disposed of in line with Council Policy. There is no indication that capacity issues exist with this, and new provisions will need to be made to serve the site.</p> <p>Council owned leisure facilities will likely benefit from increased patronage from the influx of new residents at the site. There is no indication of a capacity issue in terms of leisure provision.</p> <p>In their representations to the Preferred Strategy South Wales Police have not identified any capacity issues.</p>	

**Affordable Housing and the Barry / Dinas Powys Housing Market**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>There will not be enough affordable housing provision at the site and young people / locals will not be able to afford the market housing. The failure to delivery affordable housing will conflict with Objective 3.</p> <p>Empty homes should be filled first.</p>	<p>As set out in the Preferred Strategy this site will provide a minimum of 40% affordable housing. Whilst the provision of this number, or even the whole site, as affordable housing would not meet the identified affordable housing demand in the Vale, the development at this site will go some way toward alleviating local need.</p> <p>It is acknowledged that bringing empty homes back into use is an important priority. There are over 500 long term empty homes in the Vale of Glamorgan. As set out in the RLDP Preferred Strategy, we are seeking to deliver 7,890 homes. Therefore, bringing back all empty homes into use would not achieve the delivery target. The Council are charging a 150% Council Tax premium on long term empty</p>	

<p>Significantly smaller residential schemes have been refused planning permission for being outside of settlements.</p>	<p>homes, and this is set to increase to 200% in 2025/2026. Therefore, efforts are being made to encourage these homes to be brought back into use.</p> <p>It is likely that smaller residential schemes outside of settlement boundaries have been refused planning permission. That is because they will have been considered against the adopted Local Development Plan or a previous iteration of the Development Plan relevant to the Vale. New housing should be directed to allocated sites and a purpose of the Local Development Plan is to allocate these sites. That is the process now taking place, and it includes Land North of Dinas Powys as a proposed allocation.</p>	
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### **Location of Development**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>No new housing should be located in Dinas Powys.</p> <p>Development should take place on brownfield land first and there have been no attempts to site development there first. There is sufficient brownfield land in the Vale of Glamorgan and nearby Cardiff. Why was the St Andrews Quarry Site, which is brownfield, not allocated? The failure to prioritise brownfield land first conflicts with Objective 5.</p> <p>Housing should be closer to the M4.</p> <p>A self-contained development away from existing residential areas would be better.</p>	<p>Dinas Powys ranks highly in the Settlements Appraisal and is considered a sustainable settlement. It is served by high levels of public transport service given the train links and is served by a range of facilities and services. Therefore, it is clear that Dinas Powys is suited to new development. Furthermore, it is considered that new development would further enhance the viability and vitality of the locality by introducing new potential patrons to the settlement's services, further bolstering its businesses. When considering the constraints surrounding Dinas Powys and the south east of the Vale of Glamorgan more generally it is evident that development opportunities are limited in an area that has one of the highest housing needs. In comparison to other sites proposed for allocation in the locality, including the much larger site promoted here, this site is considered to be an appropriate scale in a relatively unconstrained location. A particular advantage of this site is its close proximity to public transport provision, which means that it performs well against the Preferred Strategy's preferred spatial option.</p> <p>As set out in the responses to biodiversity and Green Wedge/Landscaping issues, the larger site was not considered appropriate for development due to its implications for these issues. However, the scaled down site provides an appropriate quantum of development that does not cause unacceptable prejudice</p>	<p>N/A</p>

<p>The original candidate site submission was rejected and scaled down due to impacts on the green wedge and biodiversity. This smaller site should have been removed for the same reason.</p>	<p>when considering these issues and provides a contribution to the housing requirement in an area of high need.</p> <p>It is apparent that the number of brownfield sites that are ready for housing development within the RLDP plan period is limited. No candidate sites were promoted on brownfield land in sustainable locations during the call for candidate sites that would be considered Key Sites in the RLDP. There are several smaller scale sites that may be allocated for housing; however, these alone would only meet a small portion of the overall housing target. Instead, in order to meet the housing requirement, development on greenfield land is required. As set out, this site is likely the least constrained within the Dinas Powys community, including in Penarth and therefore it is a reasonable location for development. A biodiversity net-benefit will be delivered through the development and therefore harm to the natural environment will be avoided. The St Andrews Quarry Site has not been identified for allocation as it is sited within the open countryside, is not physically associated with Dinas Powys, and would not be considered a suitable sustainable site.</p> <p>The M4 corridor is not considered a suitable location for development in the Vale of Glamorgan and significant residential development in this locality would not comply with our spatial strategy, or national planning or transport policy, which seeks to focus new development in sustainable locations well served by public transport. M4-based development would be inherently car focused. The communities in the Vale of Glamorgan sited near to the M4 are rural hamlets and villages with poor service provision and limited facilities. The area is also poorly served by public transport. It is not considered that new development at a scale to meet the housing requirement set in the RLDP would be suitable in the area along the M4 corridor and resultantly this was not considered as a spatial option for the Preferred Strategy.</p> <p>New settlements, as suggested should be considered by some respondents, cannot be delivered through Local Development Plans and paragraph 3.53 of Planning Policy Wales (Edition 12) rules these out.</p>	
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## Health and Wellbeing

Issue raised	Council response	Action
<p>The proposed development will reduce the living standards of existing residents.</p> <p>The development will remove land, accessible by public rights of way, that is used by residents to exercise, walk their dog and relax, impacting their mental health. This will conflict with objective 2.</p> <p>There will be an increase in crime.</p> <p>There will be nuisance, congestion, and safety issues caused by construction at the site.</p> <p>Development on the site will impact on the privacy of existing neighbours that adjoin the site.</p> <p>Views from houses surrounding the site will be ruined.</p>	<p>Currently, the majority of the site is private owned farmland and small parts of this are only accessible by poorly maintained public rights of way, none of which are paved. Notwithstanding the wellbeing benefits for future users associated with homeownership, the development of this land will significantly increase public access to this parcel of land. The development will open up the site to public access allowing access for all through public areas, massively improving the physical health benefits of the site. Through designing high quality areas of public open space, the opportunity also exists to create restorative places that will provide benefits to mental wellbeing as well.</p> <p>It is likely that nuisance and congestion will result from the development of the site. This is to be expected in all construction operations and would be an issue wherever development to meet the housing requirement was directed. The impacts of this can be controlled at the planning applications stage through Construction and Environmental Management Plans.</p> <p>The introduction of this housing may increase crime in the locality. However, this would be the case wherever new development is sited. There is no reason to believe crime rates would be any higher than normal and this would not be a reason to object to the development. A key part of placemaking is ensuring new developments are safe through good design.</p> <p>It is accepted that new housing will change the character of the locality for existing residents, and there will be more people in the area. However, any issues of privacy, such as overlooking from the site, will be addressed at planning application stage and privacy standards will be maintained in line with established amenity standards.</p> <p>It is a long-standing principle in UK land use planning that nobody has the right to a private view. Therefore, the loss of a view is not considered to be suitable grounds for ruling this site out for allocations.</p>	<p>N/A</p>

### **Impact of the development on Dinas Powys and Llandough**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>This development will remove the village status of Dinas Powys and turn it into a town. This will erode the community feel of the village and conflict with Objective 4.</p> <p>The development is not proportional to the scale of Dinas Powys, which is already over developed, and had three allocations in the current LDP (2017-2026).</p> <p>The development will negatively impact the character of Llandough.</p>	<p>It is not considered that new development in the locality would detriment it. New development would improve the viability of existing businesses and allow more to become established, by virtue of increased potential patronage. Through ensuring that Placemaking principles are followed in designing the site it can be ensured that the development respects and integrates with the existing settlement appropriately. To ensure this, the Council propose to conduct Placemaking workshops which will allow the local community to engage with the developer and set out what priorities they have for the site.</p>	<p>The Council will ensure that Placemaking workshops are conducted, including the developer and local community.</p>

### **Section 106 and Infrastructure Contributions**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Developers have a poor track record of delivering Section 106 contributions in the Vale of Glamorgan and this will continue to be the case on this site.</p>	<p>In the 5 financial years up to April 2023 (not including 2023-2024) following the adoption of the Adopted Local Development (2011-2026) the Council received £30,198,719 in Section 106 contributions. In 2022/2023 £6,204,869 was spent on schemes. Therefore, the Council has received and spent significant amounts of S106 contributions since the plan was adopted.</p> <p>In order to evidence that sites are deliverable it will have to be evidenced that they are viable, and this would have to consider S106 contributions. If it transpires that sites are no longer viable following approval the Council have the opportunity to dispute this and if required refuse planning permission. If developers fail to meet their planning obligations in pre-agreed timelines the Council retain the ability to take legal action.</p>	



**Miscellaneous issues**

Issue raised	Council response	Action
<p>Development will impact property values.</p> <p>This is a money-making scheme between the Council and the developer.</p> <p>The Council want the houses to benefit from more Council Tax.</p> <p>Profits from the development will leave the UK.</p>	<p>It is a long-standing principle in UK land use planning that impacts to home values are considered a private matter that cannot act as a barrier to development.</p> <p>The Council are not promoting this site and would not see any income from the development. The Council Tax generated from the site is not a reason for justifying the development. The development is justified based on meeting the housing requirement, as justified in the Preferred Strategy.</p> <p>The developers' profits are not a concern of the RLDP.</p>	

**Issue: Climate Change**

Issue raised	Council response	Action
<p>The proposals are against the Council's declared climate emergency. Mitigating climate change should be prioritised over new development and the loss of greenfield land. The carbon budget does not exist to be constructing any new development.</p> <p>New development will consume more energy, emitting more greenhouse gases. New homes should include low carbon technologies including heat pumps and solar panels.</p>	<p>Mitigating the causes of climate change is integral to the RLDP and this is reflected throughout the Preferred Strategy. The strategy seeks to mitigate the impact of future planned growth through concentrating this growth within settlements that offer good public transport connectivity. The plan also contains a number of policies aimed and ensuring future growth incorporates active travel and green infrastructure, that homes built to high sustainability credentials, and ensure that appropriate measure are taken to reduce and mitigate the risk of flooding. Through this approach it is considered that an appropriate balance has been achieved between meeting the housing requirement and mitigating the impacts of climate change.</p> <p>Particularly, in relation to new homes and buildings generally, the Council are investigating the production of planning policy that seeks to ensure these are low carbon, through a fabric first approach. Subject to viability, it is anticipated that this policy will require new buildings to be net zero in their operation.</p>	

**Specific on-site and off-site issues**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The site is not served by gas or electricity mains.</p> <p>Development has already commenced at the site.</p> <p>The development will encroach onto Seel Park.</p>	<p>National Grid Electricity Distribution and Wales and West Utilities have been made aware of the proposed allocation of these sites and will have to ensure that capacity exists prior to development taking place. The developer will be responsible for ensuring that the site is capable of making connections to utilities. Given anticipated changes to Building Regulations and the Council's investigation of net zero building planning policy, it may be that no gas connection to WWU is required.</p> <p>No evidence has been received to suggest that development at the site has commenced, and this would be of significant concern to the Council if so. It may be that ground testing has taken place, which can be required to inform evidence submitted in support of the site. If development were to commence in breach of planning control the Council have the ability to take enforcement action and stop it until such a time as the breach is resolved.</p> <p>Originally, Seel Park was included within the boundary of a candidate site by the promoter in error. This has since been rectified and Seel Park is no longer included within the boundary of any of the candidate sites.</p>	

### SP4 KS3 Land at Readers Way, Rhoose

A total of 100 representations were made, 1 in support, 9 comments and 90 objections.

Representation ID Name/Organisation	Issue raised	Council response	Action
1047 Dwr Cymru Welsh Water	<p>HMA will be required to establish the impact of the proposal on the existing water networks. A 9" diameter watermain crosses the site. Easement width would be required.</p> <p>HMA will be required to determine the point of connection to the public sewage system. A 150mm diameter sewer crosses the site. Easement width would be required.</p> <p>Site falls within the catchment area of the Cog Moors Wastewater Treatment Works which has capacity to accommodate the domestic foul flows from the site.</p>	Comments noted.	

### Highways

Issue raised	Council response	Action
<p>Risk of connecting Readers Way to a larger network and being used as a cut-through.</p> <p>Increased road traffic.</p>	It is acknowledged that new development may generate an element of additional traffic. However, there is a requirement that the RLDP makes provision for housing and the implications of additional traffic must be balanced against this. As shown in the Stage 1 Strategic Transport Assessment, which largely uses pre-pandemic data there are junction capacity issues in several locations within the Vale of Glamorgan. This isn't an issue localised to the areas where new	The Council will publish a Stage 2 Strategic Transport Assessment alongside the Deposit Plan.

<p>Road infrastructure not sufficient for the volume of traffic already present.</p> <p>Road to Barry already congested.</p> <p>Increased traffic would be dangerous for road users and pedestrians' safety.</p> <p>Several accidents at Weycock Cross due to increased congestion.</p> <p>Roads will not cope with increased traffic whilst new development is being built – lorries and construction vehicles.</p> <p>Poorly maintained roads.</p>	<p>allocations are being proposed, and the introduction of new housing in any location within the Vale would likely exacerbate current issues.</p>	
<p>Only one main road access into it Rhoose.</p> <p>Inadequate highway access.</p> <p>Celtic Way is unsuitable and unsafe as a link/access road and cannot be upgraded.</p> <p>Development access to be via existing totally inadequate and quiet residential cul-de-sacs.</p> <p>Not accessible without car and roads too small.</p>	<p>Development proposes two points of vehicular access, one off Readers Way and another off Celtic Way. During the most recent five-year period, a total of 10 collisions were recorded. No collisions were recorded within the vicinity of the potential access points.</p> <p>Third party ownership and purchase will need to be determined. If an access is not achievable then additional access to the North could be investigated. However, significant works would need to be carried out to the Highway Network along Port Road and up to the B4265. Any transport assessment must fully satisfy that the access points will not have a detrimental impact on the surrounding highway network. A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan.</p> <p>Active travel infrastructure will be provided at all points of access to the site. In addition, two key active travel corridors will be provided comprising a north-south connection utilising an existing PRow Holmes Farm in the north and Highfield Close in the south.</p>	<p>N/A</p>

<p>To have Celtic Way as a main thoroughfare in and out will cause accidents, pollution and congestion.</p> <p>Access roads narrow – difficult for emergency vehicles.</p>		
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### **Sustainable Transport**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Public transport links need significant improvement in terms of frequency and reliability.</p> <p>Hourly train, bus services limited, and journey times are lengthy.</p> <p>Inaccessible timetable/scheduling.</p> <p>No rail link to Cardiff airport.</p> <p>Residents will need to drive to work due to public transport being so poor and unreliable.</p> <p>Park and ride for station is too far to walk to for most residents.</p> <p>Train station requires use of a car.</p> <p>People will always need to use cars. Sustainable transport growth is ideological wishful thinking.</p>	<p>To mitigate against the harm of additional traffic, sites, including Readers Way, have been selected to reflect the chosen spatial option for the Preferred Strategy, which sought to site new development in the most sustainable transit-oriented locations. This strategy seeks to reduce the need to travel and where journeys need to be made site new development in proximity to sustainable transport nodes, prioritising the provision of active travel links. Fundamentally, there is a housing need that the RLDP is required to meet, and the implications of additional traffic must be balanced against this. If the Council were to have chosen a different spatial strategy and not proposed sites in areas well served by existing sustainable transport connections, increased car use would be a much more significant issue.</p> <p>The site is well served by public transport connections within an 800m walking distance, most notably the proximity to Rhoose station which is just over 600m from the Southern part of the site. It is appreciated that trains travelling along the Vale of Glamorgan Line are currently well used during peak times. TFW have committed to introducing additional services at peak times and they will also be introducing new trains to the Line with increased capacity.</p> <p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.</p>	<p>N/A</p>

<p>Thousands of additional car journeys daily and scores of delivery vans.</p> <p>Active travel to train station inaccessible for many residents.</p> <p>Fantasy to think that 40% of journeys will be by cycle or public transport.</p> <p>Bus service and route had been diverted away from the site due to timetabling to allow for the 20mph restrictions.</p> <p>No busses run along Fonmon Road or Rhoose Point.</p> <p>Readers Way does not have a cycleway – is not wide enough for one.</p> <p>States that trains may be 2 per hour but this is years away.</p> <p>Active travel routes are not sufficient and do not link up with current routes.</p> <p>Train station more than 1 mile from the West end of Rhoose.</p>	<p>The site is in close proximity to future active travel routes with links to be provided as part of the site development. This should include improved segregated cycleway/footway facility between the site and Porthkerry Road/Fontygary Road to link up to the proposed active travel improvements. Additionally, an active travel link should be provided to the North of the site to link to Port Road and widening of Port Road to incorporate an off-carriageway route for the available site boundary and beyond.</p> <p>The Active Travel Network Plan identifies a future active travel route between Weycock Cross and the Airport.</p> <p>A rail link directly to Cardiff airport is not currently being considered but bus service 905 connects Rhoose Station to Cardiff airport.</p> <p>The TFW Isochrones maps show that the site is within a 10-20 minute walk from Rhoose station, and 5-10 minute cycle, which means residents of the new development could walk or cycle to the station, rather than driving.</p> <p>Inaccessible timetable/scheduling is not a matter for the RLDP but should be considered by the Council's Transport Services team.</p>	
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**Public Footpaths/rights of way**

Issue raised	Council response	Action
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Options for footpath access from existing housing in Rhoose should be explored.  No footpath to Fonmon Park Road.	Opportunities to connect the development to housing on the western side of Rhoose will be explored as part of the masterplanning process.	Explore potential for active travel connection to housing to the west of the site.
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### **Parking**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Getting harder to find a parking space in the village with the increase in residents.  Parking on the proposed roads in and out of new development is already an issue.  Car park for station is inadequate for the 450 extra houses.	It is anticipated that sufficient car parking provision will be provided on site so as not to exacerbate any potential car parking issues in the locality of the site. Furthermore, the site has been selected due to its close proximity to sustainable transport nodes and it is anticipated that this would reduce the need to travel and for car ownership.  The TFW Isochrones maps show that the site is within a 10-20 minute walk from Rhoose station, and 5-10 minute cycle, which means residents of the new development could walk or cycle to the station, rather than driving.	N/A

### **Infrastructure, services and facilities**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Developer should have to provide commercial units to increase local services.  Insufficient amenities.  What improved local services will be provided?	The Settlements Appraisal Review has reviewed the services and facilities within Rhoose, which include two primary schools, a number of retail units and food/drink establishments and a community library.  Whilst the key site would be residential led, the initial indicative plan shows there is the potential for the part of the site to be mixed use. The Council shall consider the range of services and facilities to be provided as part of the housing proposals within Rhoose with the aim to facilitate improved accessibility to services and facilities. To this end the Council shall be arranging community engagement sessions in respect of Key housing sites proposed within the RLDP. This will	Arrange community engagement sessions in respect of Key housing sites to discuss placemaking.

<p>Not enough infrastructure to support current demands.</p> <p>No mention to how infrastructure will be improved to facilitate development.</p> <p>No coffee shops, value supermarkets, sports facilities.</p> <p>Will be a small town with the infrastructure of a small village.</p> <p>What are the mixed uses?</p> <p>Higher population than Cowbridge and Llantwit with much less facilities.</p> <p>Electrical infrastructure is not fit for purpose.</p>	<p>provide communities the opportunity to engage with site promoters to identify community aspirations.</p> <p>The Council will also explore potential for multi-use community buildings such as access to facilities that existing within local schools for the benefit of residents.</p> <p>In addition, S106 contributions will be sought from the developer towards the costs of providing community and social infrastructure, the need for which has arisen as a result of a new development taking place.</p> <p>Future infrastructure requirements will be integrated within the development sites and where appropriate the provision will be phased in step with the development to ensure the timely provision to meet rising demand such as additional educational provision.</p> <p>Proposals for additional retail and commercial uses will be considered within the context of the retail evidence undertaken by the Council alongside national policy.</p> <p>In respect of electrical infrastructure, the Council has consulted National Grid and they have not raised any specific concerns about Rhoose.</p>	
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**Biodiversity, Ecosystem Resilience and Habitats**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Disruption to wildlife from hedgehogs, birds of prey to foxes.</p> <p>Natural habitats of local wildlife like the Red Crested Newts, owls, foxes, hedgehogs and bees will be destroyed.</p>	<p>A preliminary ecological assessment has been received for the site, which shows part of the site is improved grassland, which is a habitat of low conservation importance. and part is agricultural stubble. The site is bounded primarily hedgerows, which would need to be retained wherever possible. NRW did not raise concerns as part of the Preferred Strategy consultation but had submitted previous comments on the site as part of the candidate site process identifying that any application for this site would need to be supported by up-to-date ecological survey information, determined in liaison with the Local Authority Ecologist. There were records of European Protected Species, including great</p>	<p>Consider findings of Great Crest Newt survey work and ensure the Masterplan responds to this.</p>



<p>Pond on Readers Way is home to Great Crested Newts which is a priority species.</p> <p>Increase in traffic may impact on Great Crested Newts.</p> <p>Need for a network of ponds and rough areas to assist the Great Crested Newt population immediately adjacent to Readers Pond.</p> <p>Need to protect duck pond in Fonmon area due to increased vehicles.</p>	<p>crested newt, in the area. Further consideration will be given to the ensuring biodiversity net benefit as the design and layout of the site progresses.</p> <p>Readers Way Pond (SINC 41) is located to the south of the site and is designated for the protection of Great-crested newts. As part of the internal consultation during the Stage 2 Candidate Site Assessment, it was identified that in progressing the site, work would need to be done so that there is a significant buffer of green space adjacent to the pond. Options include integrating SUDS features nearer the pond and locating some of the informal green space immediately adjacent rather than low density housing. The initial illustrative site plans published as part of the Preferred Strategy are indicative and a more detailed masterplan will be published as part of the Deposit Plan that will address any identified affects. Further survey work in respect of the Great Crested Newts will also be carried out.</p> <p>Aside from the Great-crested newts, Cardiff Airport is home to the only other protected or priority species which may use the adjacent land; a population of European Brown Hares – a section 7 species. A more complete and detailed Preliminary Ecological Appraisal (PEA) is required to progress the site and discussions with Cardiff Airport will take place to ensure that any ponds created are unattractive to ducks, waders and gulls.</p>	
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### **Flooding & Drainage**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Increased risk of flooding due to building on farmland as the fields aid drainage.</p> <p>Sewer capacity insufficient.</p> <p>Run-off will overload an already overloaded system.</p>	<p>The site is outside of flood risk areas for rivers, sea, surface water and small watercourse flooding on the Flood Map for Planning. Notwithstanding this, it has been identified that there have been historical occurrences of flooding on Readers Way in the past.</p> <p>The Council will require the developer of the site to undertake a high-level Flood Risk and Drainage Assessment to identify potential flood risks associated with the site. The Council's Drainage Team and Natural Resources Wales will have to be</p>	<p>Liaise with the site promoter in respect of undertaking further work on flooding and drainage.</p>

<p>Access to area floods on a regular basis – risk to existing properties.</p> <p>Suggested flood prevention work on the development would be no more effective than existing measures.</p> <p>What compensation guarantees can the Authority give should future flooding occur?</p> <p>Increased risk of flooding to surrounding existing properties.</p> <p>Sewage goes to Barry pumping plant and risks overflow impact on Whitmore and Jackson Bay beaches.</p> <p>No natural soak away into the ground.</p>	<p>satisfied that the drainage and flooding measures proposed on site are sufficient to deal with the associated risk prior to any development taking place.</p> <p>Since 2019 Sustainable Drainage Systems (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 detriment offsite.</p> <p>Dwr Cymru Welsh Water have identified, as part of the Preferred Strategy consultation, that the site 'Land at Readers Way, Rhoose' falls within the catchment area of Cog Moors Wastewater Treatment Works (WwTW) which has the capacity to accommodate the domestic foul flows from this site.</p>	
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**Conformity of Site with Vision, Aims and Objectives**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Site does not meet Objective 5 – Protecting and Enhancing the Natural Environment.</p> <p>Building on green wedge, agricultural land with destruction of wildlife habitats is the exact opposite of the stated aims.</p> <p>Contrary to Objective 4 – Placemaking.</p>	<p>The Council strongly believe that the site aligns with the Preferred Strategy. With regard to the Vision, an integral part is housing growth that delivers homes for all. Fundamentally, without the delivery of housing the intention of the Vision cannot be achieved. Ultimately, that delivery does lead to the need for issues to be balanced in some cases. However, through aligning with the drafted strategic policies within the Preferred Strategy and national planning policy, particularly on placemaking, it will be ensured that the site conforms with the Vision in its entirety.</p>	

<p>Contrary to Objective 7 – Fostering Diverse, Vibrant, and Connected Communities.</p> <p>Contrary to the stated green objectives and the preservation of existing communities.</p> <p>Development of site does not fit with declared climate emergency.</p>	<p>The strategic objectives of the Preferred Strategy have been developed through an assessment of the key issues that the plan seeks to address. These objectives are directly linked to the strategic policies set out in the Preferred Strategy. In this regard the plan should be considered as whole as there is a direct correlation between the objectives of the plan and the policies by which the Council shall consider future development proposals. This shall include the master planning of sites.</p> <p><b>Objective 1 Mitigating and Adapting to Climate Change</b> - The RLDP strategy seeks to mitigate the impact of future planned growth through concentrating this growth within settlements that offer good public transport connectivity. The plan also contains a number of policies aimed and ensuring future growth incorporates active travel and green infrastructure, that homes built to high sustainability credentials, and ensure that appropriate measure are taken to reduce and mitigate the risk of flooding.</p> <p><b>Objective 4 – Placemaking Objective 4</b> – the Council is currently assessing infrastructure requirements associated with key sites, including any opportunities for improving access to services.</p> <p><b>Objective 5 – Protecting and Enhancing the Natural Environment-</b> There is a legislative requirement for the RLDP to achieve biodiversity net gain where development is proposed, and this is reflected within the wording of Objective 5.</p> <p><b>Objective 7. – Fostering Diverse, Vibrant and Connected Communities-</b> The Council have projected that over the plan period the working population within the Vale of Glamorgan shall increase by 4,875 persons as a result of the housing growth proposed through the Preferred Strategy. This closely aligns with the 5,338 jobs that could be supported through the forecast employment land requirements over the same period. Additional local employment opportunities will also be created through the redevelopment of Aberthaw power station.</p>	
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**Pollution**

Issue raised	Council response	Action
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<p>Noise pollution as a result of increased traffic.</p> <p>More cars mean more pollution.</p> <p>Reduction in air quality.</p>	<p>There is a noise source to the East of the site in the form of Cardiff Wales Airport and the BAMC facility which amongst other operations carries out engine testing. It is noted that TAN 11 has specific NEC with specific regard to air traffic. Therefore, as the LPA considers the site viable terms, an acoustic report would be required, taking into consideration TAN 11 or its replacement, and all other relevant standards and guidance. Details of any necessary design measures and mitigation, sound insulation and ventilation measures etc. required shall be provided at the pre and /or application stage.</p> <p>A CEMP would also be required with any planning application noting future and current residents within the vicinity of the site.</p> <p>As part of the planning application process, there may be a need to carry out an Air Quality Impact Assessment that would investigate the implications of air pollution on the site and resulting from an increase in car journeys from the site. Appropriate mitigation can be put in place at that time to address any potential issues.</p>	<p>The requirement for an Air Quality Impact Assessment to be undertaken as part of a planning application will be identified in the Deposit RLDP.</p>
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**Need/Size of Development**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Too many houses.</p> <p>There must be a 'tipping point' before Rhoose becomes a suburb of Cardiff.</p> <p>Further 450 houses will overwhelm the community.</p> <p>750 new houses for Rhoose is a massive jump.</p>	<p>All local authorities within Wales must plan for future population and household growth and publish a Local Development Plan for its area. The housing growth proposed in the Vale of Glamorgan RLDP shall cater for the future population change and household growth that shall occur within the authority between 2021 and 2036.</p> <p>The level and distribution of housing growth in the plan is set out in the Spatial Strategy of the plan, influenced by the acknowledgement that in light of the Climate Emergency there is a pressing need to for the plan to contribute towards reducing private car usage by ensure future housing growth is located with settlements that offer greatest opportunities to reduce the need to travel through</p>	<p>N/A</p>

<p>So many new houses when the community does not want them.</p> <p>Smaller villages like Rhoose are not set up for the volume of houses planned.</p> <p>Agree with housing need but there are better sites.</p> <p>Over 70 properties for sale at the moment so no need to build more.</p>	<p>the co-location of housing and employment and for residents to travel by public transport - consistent with the Vision.</p> <p>The RLDP makes provision for 8,679 dwellings to meet a housing requirement of 7,890 dwellings, as justified within the Preferred Strategy. This requires the allocation of 2,619 dwellings on new sites, alongside the existing supply and projected windfall allowances.</p> <p>There are a number of local facilities and amenities available within Rhoose and the surrounding area including shops, a primary school, leisure facilities, a pharmacy as well as access to public transport opportunities such as buses and trains that make it a sustainable location for development.</p> <p>This site has been selected following a robust assessment and is considered to be appropriate and accord with the strategy. The level of growth is considered acceptable in light of Rhoose's role as a Primary settlement.</p> <p>There is always a churn in the property market as people move for a variety of reasons. The fact there are homes up for sale does not in itself mean more homes are not required.</p>	
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**Greenfield Development**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Abundance of brownfield sites not addressed.</p> <p>Site is located on a green wedge.</p> <p>Destruction of a designated green wedge.</p>	<p>It is apparent that the number of brownfield sites that are ready for housing development within the RLDP plan period is limited. No candidate sites were promoted on brownfield land during the call for candidate sites that would be considered Key Sites in the RLDP. There are several smaller scale sites that may be allocated for housing, however, these alone would only meet a small portion of the overall housing target. Instead, in order to meet the housing requirement, development on greenfield land is required. A biodiversity net-benefit will be delivered through the development and therefore harm to the natural environment will be avoided.</p>	<p>N/A</p>

<p>Concreting over vast area of remaining green space where residents can currently walk or run and children can play.</p> <p>Enough empty premises already – please fill these before filling fields with concrete.</p> <p>Imperative that designated areas are safeguarded and where possible take advantage of opportunities to create new ecological networks.</p> <p>There is land adjacent to the airport already marked for development with access to Rhoose bypass – this area should be considered before a green wedge.</p> <p>Better for the environment being left as fields – grass removes more CO2 than a tree.</p>	<p>The site is located within a green wedge, but it is the view of the landscape officer that the proposed development would not harm the integrity of the designation. A review of Green Wedges will be taking place ahead of the publication of the Deposit Plan and this will fully detail the justification for excluding the site from the Green Wedge.</p> <p>It is acknowledged that bringing empty homes back into use is an important priority. There are over 500 long term empty homes in the Vale of Glamorgan. As set out in the RLDP Preferred Strategy, we are seeking to deliver 7,890 homes. Therefore, bringing back all empty homes into use would not achieve the delivery target. The Council are charging a 150% Council Tax premium on long term empty homes and this is set to increase to 200% in 2025/2026. Therefore, efforts are being made to encourage these homes to be brought back into use.</p> <p>It is assumed that the site being referred to as being ‘marked for development’ is Land north of the Railway Line, Rhoose. This is an allocation in the adopted LDP that is to be rolled forward into the RLDP. The site is subject to a planning application and is also included in the housing land supply.</p> <p>Currently, the majority of the site is private owned farmland and small parts of this are only accessible by poorly maintained public rights of way. The eastern part of the site, adjacent to the airport runway, is proposed to be enhanced as an area of open space, which will afford more opportunity for the public to utilise it than the current situation.</p>	
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**Loss of Agricultural Land**

Issue raised	Council response	Action
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<p>Building on existing farmland used for crops.</p> <p>Further loss of farmland and food production capability.</p> <p>Agricultural land needs to remain as such.</p> <p>No mention of the loss of fine agricultural land when there are still old industrial sites to the south of the village which are undeveloped.</p>	<p>Development on Land at Readers Way, Rhose would not result in the loss of Best and Most Versatile Agricultural Land.</p> <p>It is apparent that the number of brownfield sites that are ready for housing development within the RLDP plan period is limited. No candidate sites were promoted on brownfield land during the call for candidate sites that would be considered Key Sites in the RLDP. There are several smaller scale sites that may be allocated for housing, however, these alone would only meet a small portion of the overall housing target. Instead, in order to meet the housing requirement, development on greenfield land is required A biodiversity net-benefit will be delivered through the development and therefore harm to the natural environment will be avoided.</p>	<p>N/A</p>
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### **Health Infrastructure**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Pressure on medical services.</p> <p>Cannot get a dentist locally.</p> <p>Getting a doctor's appointment already difficult before an increase in residents with right to medical services.</p> <p>Increasing housing without easing pressure to medical services is naïve and will result in increased risk to patients.</p> <p>Have to travel to Barry for medical services – inaccessible for older or disabled persons.</p>	<p>The Council are liaising with Cardiff and the Vale University Health Board to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, CAVUHB will be able to plan for future service requirements and plan accordingly.</p>	<p>The Council will continue to liaise with CAVUHB.</p> <p>The Deposit Plan will be supported by a background paper which will consider the impact of new development on health services and how this can be addressed.</p>

<p>Medical services already feeling the strain of the rapidly increasing population of the village.</p> <p>Access to health and social care services is more challenging in Rhoose, given the ageing population.</p>		
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### **Education**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Pressure on schools.</p> <p>Primary schools at capacity – no local secondary school, children are bused to Cowbridge.</p> <p>The existing old village school will need a major redevelopment if it is to cope with 400 extra families.</p> <p>Schools already over capacity.</p>	<p>The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly.</p>	<p>The Planning Department will continue to liaise with the Sustainable Communities for Learning Team.</p> <p>The Deposit Plan will be supported by a background paper which will consider the impact of new development on school capacity and how this can be addressed.</p>

### **Heritage and Historical Assets**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Potentially building on a graveyard/historic chapel north of Readers Way?</p>	<p>As part of the Stage 2 Candidate Site Assessment, the HER noted two archaeological features or findspots within or adjoining the area. These relate to medieval activity and include a chapel and graveyard marked on historic mapping.</p>	<p>N/A</p>



	Desk-based assessment and geophysical survey, prior to any determination of an application would inform mitigation, which may include further pre-determination work.	
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### Health and Wellbeing

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Health issues and stress caused by developments need more consideration.</p> <p>Increase in stress due to dust/noise/mud/traffic congestion/air quality/anti-social behaviour.</p> <p>Effect on mental health is significant.</p> <p>Health of residents will be impacted considering 60-85 years population very high in Village.</p> <p>Wellbeing out the window with houses crammed together.</p>	<p>The Council will ensure that all new development shall meet the RLDP wellbeing objective which is supported through the plan with policies that will require wellbeing to be fully considered as part of any development proposals. These will include incorporation of green infrastructure, open spaces, active travel and, when identified, enhanced access to local health facilities. Development at Readers Way, Rhoose will significantly increase public access to this parcel of land. The development will open up the site to public access allowing access for all through public areas, massively improving the physical health benefits of the site. Through designing high quality areas of public open space, the opportunity also exists to create restorative places that will provide benefits to mental wellbeing as well.</p> <p>It is likely that nuisance and congestion will result from the development of the site. This is to be expected in all construction operations and would be an issue wherever development to meet the housing requirement was directed. The impacts of this can be controlled at the planning applications stage through Construction and Environmental Management Plans.</p> <p>Additionally, the Council will be producing Supplementary Planning Guidance on health and wellbeing alongside the Deposit Plan which will provide further detail on measures which the Council will require new developments to incorporate.</p>	N/A

### Location

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Needs to be more focus on these areas rather than making deals with	Following the candidate site assessment process undertaken to inform the Preferred Strategy, the sites identified as Key Sites, including Land at Readers	

<p>housebuilders to build more houses in already built-up areas.</p> <p>Lack of imagination choosing locations.</p> <p>Rhoose is not a primary settlement.</p> <p>Risk of merging into nearby Nurston.</p> <p>Rhoose is not a suburb of Barry.</p>	<p>Way, Rhoose, are those that are considered to best accord with the principles of the Preferred Strategy due to their locations in close proximity to sustainable transport links, services and facilities and are sites that are considered to be viable and deliverable, having regard for constraints.</p> <p>Rhoose is identified as a primary settlement under Policy SP2 as development within this settlement will reflect the complimentary role the area plays in relation to Key and Service Centre Settlements, including Barry, as well as transport connectivity and areas of employment.</p> <p>This site has been selected following a robust assessment and is considered to be appropriate and accord with the strategy. The level of growth is considered acceptable in light of Rhoose's role as a Primary settlement.</p> <p>The site does extend development northward to the group of houses known as Nurston, but the boundary of the development is no further north than the existing housing estate off Fonmon Road.</p>	
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### **Affordable Housing**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Affordable homes require might higher density which goes against the historic development of the Vale.</p> <p>More housing for senior managers/professionals would contribute to the release of affordable housing on the residential ladder.</p> <p>The proposed large housing developments have discouraged small</p>	<p>The Vale of Glamorgan RLDP highlights that there are high levels of affordable housing need within the Vale of Glamorgan. The areas of acute need are within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhoose, Wenvoe and St Athan. Although there are a significant number of people on the waiting list across all areas of the Vale, as evidenced within the Council's Draft Local Housing Market Assessment (2023).</p> <p>In meeting the objective 'Homes for All' a range and choice of housing is needed. This will include private market housing of all sizes as well as affordable housing.</p> <p>The Council's adopted LDP places a requirement for new housing developments within Rhoose to provide 35% of the total number of houses as affordable. This is</p>	<p>N/A</p>

<p>scale affordable housing developments in these areas.</p> <p>Large percentage of social housing will bring disruption to currently quiet areas with no plans for additional policing put forward.</p>	<p>based on current economic viability evidence. Presently the Preferred Strategy has calculated that existing housing sites within the land bank supply will have the capacity to deliver some 2,000 dwellings. This figure will be amended to take account of the affordable housing contributions that will be provided on Key Housing Sites identified within the Preferred Strategy following detailed site viability appraisals have been undertaken. The final housing target will set out in the Deposit RLDP.</p> <p>A site of this scale will deliver affordable housing through Section 106 agreements, which will be transferred to a Social Housing provider for management. There is still potential for affordable housing providers to deliver smaller affordable sites where opportunities exist. In addition, the Council are seeking to allocate affordable housing-led schemes in primary and minor rural settlements outside of the Strategic Growth Area.</p> <p>In their representations to the Preferred Strategy South Wales Police have not identified any capacity issues or concerns that increased social housing will increase crime. Affordable units will be mixed with market sector units to ensure integrated communities.</p>	
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### Planning History

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Overwhelmed by housing estates – an additional 280 houses in the pipeline before this plan.</p> <p>Plans fail to recognise there are already 300 additional houses in the pipeline for the East of Rhoose.</p> <p>A lot of development in Rhoose with developers failing to deliver agreed facilities.</p>	<p>The table under SP4: Key Housing-Led Sites identifies the site ‘Land north of the Railway Line (East), Rhoose’ as SP4 L10 and acknowledges that there is a planning application awaiting determination with 282 dwellings still to be delivered as of 1<sup>st</sup> April 2023. The plan therefore does identify that SP4 L10 is identified for residential development in Rhoose to help deliver the plan’s strategic growth and contribute to meeting the housing requirement set out in SP3, along with a list of other additional land across the Vale.</p> <p>In the 5 financial years up to April 2023 (not including 2023-2024) following the adoption of the Adopted Local Development (2011-2026) the Council received £30,198,719 in Section 106 contributions. In 2022/2023 £6,204,869 was spent on</p>	<p>N/A</p>

<p>Over 1000 homes have been introduced in Rhoose alone.</p>	<p>schemes. Therefore, the Council has received and spent significant amounts of S106 contributions since the plan was adopted.</p> <p>In order to evidence that sites are deliverable it will have to be evidenced that they are viable, and this would have to consider S106 contributions. If it transpires that sites are no longer viable following approval the Council have the opportunity to dispute this and if required refuse planning permission. If developers fail to meet their planning obligations in pre-agreed timelines the Council retain the ability to take legal action.</p> <p>It is accepted that Rhoose has experienced growth in previous plan periods. However, there remains a need for new development, including affordable housing units, in Rhoose and it is considered to be a sustainable location for additional housing growth.</p>	
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**Effect on Character of Village and other Settlements**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Destroying village/community character and identity.</p> <p>Undesirable place to live.</p> <p>Will be no sense of place anymore a small rural community will be absorbed into an anonymous conglomerate of urban sprawl.</p>	<p>The character of the countryside will inevitably change in this location as it will become urbanised. However, as the site sits above an existing large residential development, it is already peri-urban with the airport adjacent and community facilities in close proximity to the south. Therefore, this isn't an isolated rural site. Given the limited availability of brownfield land the loss of countryside character would be an inevitability in meeting the housing requirement on any greenfield site chosen.</p> <p>Development proposals are required to demonstrate Placemaking Principles which will add social, economic, environmental, and cultural value, resulting in enhanced local benefits. For example, a diverse mix of uses, green infrastructure, active travel and more (full list under SP5 in the Preferred Strategy). A Placemaking Statement will be required for the Readers Way development to set out how the proposal accords with each Placemaking Principle.</p>	<p>N/A</p>

**Trees, Woodland and Hedgerows**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
No provision or mention has been made about protecting ancient hedgerows and boundaries.	<p>The initial illustrative layout identified that many of the hedgerows will be retained as part of the primary green infrastructure connectivity. There is a requirement for there to be a biodiversity net benefit as part of the development so if the loss of hedgerow is unavoidable, suitable mitigation over and above what is lost is required.</p> <p>A more detailed design layout will be developed to support the Deposit Plan.</p>	Review hedgerows as part of the masterplanning process.

### **Conformity with National, Regional and Local Policy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Plans contradict new Welsh Government laws to reverse the loss of wildlife and protect nature.	<p>Whilst it is acknowledged that the development will result in the loss of green infrastructure and biodiversity as justified elsewhere potential harm has to be balanced against allocating sites to meet the housing requirement.</p> <p>National planning policy and proposed policy within the RLDP on green infrastructure is strong. Any future development at the site would have to comply with this and resultantly it is considered that a suitable scheme that protects key green infrastructure features and provides a biodiversity net benefit can be achieved.</p> <p>A preliminary ecological assessment has been received for the site and this has informed the layout.</p>	

### **Employment**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Limited employment opportunities in Rhoose.</p> <p>No growth in employment planned – no business has expressed an interest in building.</p>	Land at Readers Way is well positioned in terms of employment opportunities. There are a number of local facilities and amenities available within Rhoose and the surrounding area that offer employment.	

	<p>Additionally, Rhoose is close to both the Cardiff Airport Enterprise Zone and Bro Tathan Enterprise Zone, as well as and the former Aberthaw Power Station, which is to be redeveloped as a green energy hub.</p> <p>Land south of Port Road (Model Farm), Rhoose is currently subject to an appeal for non-determination of an outline planning application for a B1, B2, B8 Business. 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.</p>	
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### Housing Type

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
More single occupancy houses than ever. Current building plans only seem to want to build 3 or 4 bedroom which only benefits the developer.	Policy SP5: Placemaking identifies that housing developments must offer a range of housing types and tenure to accommodate a range of needs. Further detail on the housing mix at Readers Way will be provided at Deposit as part of the greater master planning process, however, the exact mix of housing types and tenures throughout the site will be determined and finalised at the time of a planning application.	N/A

### Site Boundary

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Ownership boundary has been amended to include land between the original site boundary and Celtic Way.	A Highways assessment of the site indicated that there was a potential third-party land ownership issue between Celtic Way and the site boundary. This issue has been resolved and the site promoter has submitted a Deed of Variation which includes this area of land. The boundary of the site will need to be amended to reflect this.	Amend site boundary to reflect Deed of Variation.
Proposed access point affects garden and driveways on Llanmead Gardens.	Figure 15 shows an initial illustrative plan of the proposed housing allocation at Land at Readers Way, Rhoose. This plan is indicative and may be subject to change as part of detailed masterplanning work. The plan shows two potential active travel accesses off Llanmead Garden, but further consideration will need to be given to the feasibility of this in respect of land ownership constraints.	Consider land ownership in respect of potential active travel routes.

**Proximity to airport**

Issue raised	Council response	Action
<p>There is evidence that living near an airport causes health issues due to the toxic emissions released by aircrafts.</p>	<p>As stated within Local Air Quality Management Technical Guidance 2022, there is a risk of adverse air quality impacts from airports when the following criteria is met:</p> <ul style="list-style-type: none"> <li>• <i>Determine relevant exposure within 1km of the airport boundary</i></li> <li>• <i>If exposure has been identified, determine whether the airport total equivalent passenger throughput is more than 10 million passengers per annum (mppa). Freight should also be considered, and converted to equivalent mppa using 100,000 tonnes = 1 mppa; and</i></li> <li>• <i>Identify whether the background annual mean NOx concentration is above 25µg/m3 in these areas.</i></li> </ul> <p>There are residential properties located within 1km of the runway. However, using the latest available data taken from Welsh Government Air Transport statistics 2022, the airport total equivalent passenger throughput is at under 1 million. In 2022 air freight through Cardiff airport was 96 tonnes which is well below the threshold for adverse air quality impacts and risks to air quality objectives. Pre-pandemic figures for both passenger throughput and freight are also well below thresholds considered to give rise to adverse air quality impacts. Background nitrogen oxide (NOx) concentrations at the closest receptors are <b>8.1µg/m<sup>3</sup></b>. This is well below the background threshold of <b>25µg/m<sup>3</sup></b>.</p> <p>Based on these figures, there is no requirement to carry out any additional air quality monitoring for nitrogen dioxide as there is no risk to any legal air quality objective.</p> <p><b><u>Ultra fine particulates</u></b></p> <p>Paragraph 7.70 of LAQM TG22 states the following –  <i>In addition to NO2, there is growing evidence of the health impacts associated with Ultra-Fine Particulates (UFP) linked to airport activities. Measurements of UFP close to airports suggest that aircraft are an important source of UFP that can result in elevated concentrations tens of km from airports. Mobile UFP measurements from non-UK locations also suggest that UFP concentrations can be elevated due to landing aircraft. Local authorities should be aware of UFP as a</i></p>	<p>N/A</p>

	<p><i>potential pollutant and consider it when preparing Air Quality Plans/Strategies alongside airport operators.</i></p> <p>Research carried out to investigate the impact of UFP from airports has been carried out at various major airports across the world. These include Frankfurt Airport Germany, Schiphol Airport Netherlands, Gatwick, Heathrow and Los Angeles. There is a clear link between the impact of large airports in production of UFP and health risks. Further research is required to fully understand these impacts. However, given the throughput of these large airports and the journeys created by both passenger and freight movements in comparison to the lower throughput of Cardiff Airport, it is the opinion of Shared Regulatory Services that the level of health risk from UFPs at Cardiff Airport will be low.</p>	
<p>Any development or proposal captured within the Cardiff Airport safeguarding map will need to be sent to Cardiff Airport for formal safeguarding assessment.</p> <p>Further consideration will need to be given to a list of factors depending on the type of development. For housing development, this would include the height and position of structures, lighting and whether the development would become an attractant for birds.</p>	<p>The Cardiff Airport Safeguarding Map indicates that the key site is in an area where the Airport would need to be consulted if the height of any buildings exceeds 10m.</p> <p>Further liaison with Cardiff airport on these matters will be required as more detail on the layout is developed through the Masterplanning process.</p>	<p>Undertake further liaison with the Airport on the matters raised.</p>

### **Miscellaneous Issues**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Increasing Council tax.</p> <p>Not researched fully.</p> <p>Houses won't go to locals.</p>	<p>Council tax is not a planning consideration when determining the level of growth or spatial strategy of the RLDP or when allocating proposed key sites.</p> <p>An extensive evidence base was published on the online consultation database and available at all in-person drop-in sessions as part of the Preferred Strategy</p>	<p>N/A</p>



<p>It will reduce house prices.</p> <p>Should this go ahead, a moratorium must be placed on all surrounding land to prevent any multiple dwelling development.</p>	<p>Consultation that supported the policy decisions and housing allocations made by the Council.</p> <p>Affordable Housing in the Vale of Glamorgan is allocated via the Homes4U lettings scheme according to a household's need. Applicants are able to request a preferred location that they would prefer to live, which will allow local people to specify Rhoose.</p> <p>This impact on house prices is not a matter for the RLDP to address.</p> <p>The RLDP will allocate sites for housing and will include a settlement boundary around the existing settlement and any new allocations. The principle of additional development outside the settlement boundary will be unacceptable for the lifetime of the RLDP.</p>	
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### Consultation

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>How much consultation has there been with other service providers? – NHS, Local GP's, Police/Fire Service.</p> <p>Lack of a community Council puts Rhoose at a disadvantage – relying on people who have access to social media and the time available to respond.</p> <p>Feel this is a done deal as with only 3 councillors they will not get a say on this and be overridden.</p>	<p>The Delivery Agreement (DA, Revised November 2023) provides a list of specific consultation bodies that the Council must consult at all consultation stages in the preparation of the LDP as well as general consultation bodies to be consulted at relevant stages. The DA was subject to public consultation in 2022 and subsequently approved by Welsh Government.</p> <p>The Council has carefully considered the responses received, and this Initial Consultation Report has been prepared to set out who was consulted, the main issues raised and how these comments have influenced the next stage of plan preparation – the Deposit RLDP.</p> <p>Whilst Rhoose does not have a Community Council, elected members have been kept informed, and a consultation session was held in Rhoose, which was well attended.</p>	



## SP4 KS4 – Land at Church Farm, St Athan

### Support

Issue raised	Council response	Action
<p>Support for Key Site SP4 KS5 Land to the West of St Athan.</p> <p>This area is close to all the amenities in St. Athan</p>	<p>Support is welcomed.</p>	<p>N/A</p>

### Highways

Issue raised	Council response	Action
<p>The highway network is inadequate, the main roads to Barry and Cardiff are already heavily congested. The proposal will place additional stress on the highway system.</p> <p>There are only very limited parking places in the village with regular illegal parking offences.</p> <p>The proposed access point off Gileston Road is dangerous where there have been numerous accidents, proposals would further increase the risk.</p> <p>Church farm is on a very busy narrow road with parked cars served by a dangerous junction and requires a new access from main road.</p>	<p>The Council has undertaken a Stage 1 Strategic Transport Assessment, which largely uses pre-pandemic data, and highlights that there are junction capacity issues in several locations within the Vale of Glamorgan.</p> <p>A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan. This will include updated data, which will consider post-pandemic travel patterns. This will also identify any mitigation that may be required in to reduce the impact of the additional traffic from the sites.</p> <p>In terms of highway safety, the Council will require transport assessments to be undertaken for key housing sites. This will include the provision of necessary upgrades to the existing local highway within the vicinity of the site, including junction improvements and traffic management measure. Proposals will also be required to provide safe pedestrian access and integrate active travel measures for walking and cycling.</p> <p>Agreed improvements to the highway network, including the provision of active travel routes, will be phased as the development comes forward. This will be controlled by a legal agreement. Safe access and egress from the site will have to be assured, which shall include improvements to Gileston Road, as well as exploring the potential of and alternative access point to St Athan Primary School.</p>	<p>The Council will publish a Stage 2 Strategic Transport Assessment alongside the Deposit Plan.</p> <p>The Council will consider options to ensure that the development will improve existing highway and pedestrian safe, incorporating active travel measures that improve walking and cycling within St Athan.</p>

<p>Will Gileston Road junction be upgraded as part of the new development?</p> <p>There is a need for a new access to the school to avoid the current chaos at Rock Road. It could perhaps also allow for re-working of the badly configured Monument junction with the B4265.</p>		
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**Sustainable Transport**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Public transport to the site is poor, there are limited bus services serving St Athan.</p> <p>Developments shall increase car usage.</p> <p>There is no train station at St Athan and not likelihood that a station will be provided in the near future.</p> <p>If the station did not go ahead, then your aim of increasing the use of public and sustainable transport would be negated.</p> <p>The railway station must be built before the proposed development.</p> <p>St Athan is not within a 20-minute walk to a proposed rail station.</p>	<p>To mitigate against the traffic impact generated by additional housing, the Council's RLDP Preferred Strategy locates growth in areas that offer the greatest opportunities for residents to access public transport.</p> <p>In this regard, the strategy seeks to capitalise on potential for improving public transport provision investment offered by the South Wales Metro and Cardiff City Region. In respect of St Athan the RLDP has identified the opportunity for the reintroduction of a train station to support planned economic investments at Bro Tathan and Aberthaw, alongside the key housing sites proposed in the RLDP.</p> <p>To this end, the Council has actively engaged with Transport for Wales in developing the proposals, and in March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train station at St Athan, as identified within the Preferred Strategy. The Council are also exploring the potential for the provision of a park and ride facility at St Athan to enable improved access to train services at Llantwit Major in the interim prior to the development of the St Athan station.</p> <p>It is appreciated that trains travelling along the Vale of Glamorgan Line are currently well used during peak times. TFW have committed to introducing additional services at peak times and they will also be introducing new trains to the Line with increased capacity.</p>	<p>N/A</p>

<p>Most services and facilities are not within walking or cycling distances.</p> <p>The proposals must include improvements to public transport services.</p> <p>Lack of safe pavements and cycling routes.</p> <p>There are no active travel routes from Cowbridge to St Athan or Llantwit or between St Athan and Rhoose.</p> <p>No concrete proposal to provide additional sustainable transport links.</p> <p>Will the station be built before planning permission is granted?</p> <p>Will the safe routes to school plan be extended from Gileston village?</p>	<p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.</p> <p>Master planning of the Church Farm site shall include the provision of active travel improvements within and surrounding the site. These improvements would have the purpose of making active travel a safer option for journeys and would allow for improved accessibility from the site to existing and those proposed.</p> <p>In respect of walking distances, the proposed location for the St Athan rail station will be well within a 20-minute walking distance of this site.</p>	
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### **Flooding and Drainage**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p><b>Drainage:</b></p> <p>The existing sewage system cannot accommodate the additional housing proposed. Llantwit Major sewage works is overloaded, discharging untreated sewage into the Colhuw stream.</p>	<p>The Council has consulted Dwr Cymru Welsh Water (DCWW) to identify existing water and mains sewage capacity issues within the Vale of Glamorgan, including the capacity requirements for Church Farm. DCWW have advised that there is limited capacity to waste water treatment work to accommodate the site and future investment will be required. Developers will be required to fund the necessary assessment to determine the extent of the additional upgrades to the network at the pre planning stage.</p>	<p>Continue to engage with Dwr Cymru Welsh Water to identify necessary infrastructure upgrades.</p>

<p><b>Flooding</b></p> <p>The field floods.</p> <p>Proposals will increase flooding (e.g. onto the B4265) which is prone to flooding.</p>	<p>The Council shall require the developer of the site to undertake a high-level Flood Risk and Drainage Assessment to identify potential flood risks associated with the site. The Council's Drainage Team and Natural Resources Wales will have to be satisfied that the drainage and flooding measures proposed on site are sufficient to deal with the associated risk prior to any development taking place.</p> <p>Since 2019 Sustainable Drainage Systems (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, e.g. onto the B4265.</p>	<p>The Council, including the SuDS Approval Body, will work with the developer and NRW to ensure that that flood risk both on and offsite is appropriately managed.</p>
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### Heritage

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>There are a number of archaeological sites around St. Athan that are deserted medieval villages and are part of the history of the village and Vale and must not be disturbed.</p>	<p>An Archaeological Desk-Based Assessment has been undertaken for the site, to identify any potential effects on the settings of designated heritage assets in the surrounding area of the Church Farm site. The report concluded that the potential archaeological impact of the proposals on the site were low, and that any archaeological remains present in the study site are unlikely to be of more than local significance.</p> <p>The study did highlight the potential for some impacts on the settings of two nearby designated archaeological heritage assets, (Church of St Athan and St Athan War Memorial) but considered that the proposals would not cause substantial harm to their significance.</p>	<p>N/A</p>

## Environmental/Countryside Harm

Issue raised	Council response	Action
<p>This site is on good agricultural land, borders a historic lane which is rich in wildlife.</p> <p>Protection of natural habitats is key, inviting additional people to live in the area will put strain on flora and fauna as habitats are removed.</p> <p>How does the council plan to protect the ecology of the local environment, especially the Heritage coastline?</p> <p>The hedges have provided habitat for local species nesting, foraging and corridors. This area is not appropriate for development.</p> <p>Proposals neither protects nor enhances St Athan Doubling the size of the village will destroy its identity and make it a suburb of Llantwit Major.</p>	<p>Council Background Paper 23 Best and Most Versatile Agricultural (BMV) Land Statement sets out how the Council has considered the location and quality of agricultural land within the Preferred Strategy, notably through the assessment of Candidate Sites. In relation to the Church Farm site, an Agricultural Land Quality Assessment has been undertaken which indicates that the 24.6 ha site is predominately of subgrade 3b, with 1.5 ha of land containing a mix of Grade 2, and a small area of Subgrade 3a. Consequently, the ALC survey concludes that the site being potentially identified as grade 2 could not in any meaningful way be exploited as BMV.</p> <p>A preliminary ecological assessment has been received for the site, which shows the site is improved grassland, which is a habitat of low conservation importance. The site is bounded primarily by intact species and rich hedgerows, which would need to be retained wherever possible. NRW did not raise concerns as part of the Preferred Strategy consultation but had submitted previous comments on the site as part of the candidate site process identifying that any application for this site would need to be supported by up-to-date ecological survey information, determined in liaison with the Local Authority Ecologist. There were records of European Protected Species, including great crested newt, dormouse, otters and bats, in the area. Further consideration will be given to ensuring the biodiversity net benefit as the design and layout of the site progresses.</p> <p>National planning policy and proposed policy within the RLDP on green infrastructure is strong. Any future development at the site would have to comply with this and resultantly it is considered that a suitable scheme that protects key green infrastructure features and provides a biodiversity net benefit can be achieved.</p> <p>Broadly, the site allocation will set out what green infrastructure at the site will be protected and where biodiversity net-benefits will be achieved. More detail on this will be determined during planning applications for the site. Nevertheless, at this</p>	<p>Detailed net biodiversity benefits to be identified and integrated within site masterplan</p>

	<p>stage principles for protection and net-benefits at the site can be established through site master planning which will be published alongside the Deposit Plan.</p> <p>The character of the countryside will inevitably change in this location as it will become urbanised. However, as this is an edge of settlement area, the Council shall ensure that the proposed development will integrate with the existing settlement pattern, incorporating green infrastructure to offset biodiversity impacts. Master planning of the site will be guided by placemaking principles that will consider the relationship of the site to the existing village.</p>	
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**Infrastructure**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Dwr Cymru Welsh Water comments: Water supply:</p> <p>A HMA will be required to establish the impact of the proposal on the existing water network and potential developers would be expected to fund investigations during pre-planning stages.</p> <p>Public sewerage networks</p> <p>A HMA will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.</p> <p>WwTW</p>	<p>The Council will continue to engage with Dwr Cymru Welsh Water on the infrastructure requirements for the development site to ensure that adequate utilities provision is available.</p>	<p>Continue to continue to engage with Dwr Cymru Welsh Water on the infrastructure requirements for the development site to ensure that adequate utilities provision is available.</p>



<p>The site falls within the catchment area of West Aberthaw (WwTW) which has limited capacity to accommodate the domestic foul flows from this site.</p>		
<p><b>Educational Provision:</b></p> <p>Existing schools are at capacity and proposals would increase demand for school places.</p> <p>These plans must include a new school.</p> <p>Will the school be expanded to build extra classrooms and thereby enable all local residents to send their children to local schools?</p>	<p>The Council has undertaken an initial assessment of educational need for each of the key housing sites identified within the Preferred Strategy. Further detailed assessment of the demand for additional educational provision generated from the proposed housing growth, as well as changes in the projected school age population over the plan period is currently being undertaken by the Council's Education Department. The final details of the required provision arising from each of the proposed housing sites will be set out within the Deposit Plan, including site specific contributions towards education arising from key site allocations.</p>	<p>The Deposit Plan will be supported by a background paper which will consider the impact of new development on school capacity and how this can be addressed.</p>
<p><b>Health Provision:</b></p> <p>Health facilities (GPs, Dentist, Chemist etc.) are at capacity and difficult access services locally. Additionally, housing shall in place additional pressure on services.</p> <p>Difficult to access health services- currently part time GP services available.</p> <p>These plans must include addition GP services.</p> <p>Are there plans to build more schools, doctors' surgeries, dentists, or improve police services to accommodate the influx of residents?</p>	<p>The Council is working closely with the Cardiff and Vale Local Health Board who are currently undertaking a needs and capacity assessment of health provision within the Vale of Glamorgan over the plan period. This work includes assessing existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan, and potential impact on health services where key housing sites area identified within the Preferred Strategy. The assessment will assist the LHB to identify potential gaps in provision and inform the Council where there are potential opportunities for the provision of health facilities within the RLDP 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.</p>	<p>The Council will continue to liaise with CAVUHB.</p> <p>The Deposit Plan will be supported by a background paper which will consider the impact of new development on health services and how this can be addressed.</p>

<p>Will GP provision be expanded to allow for the extra capacity?</p> <p>St Athan will require major investment and improvements to health, public transport, doctors, parking and leisure facilities- the infrastructure should be in place prior to development.</p>		
<p><b>Other Infrastructure Issues:</b></p> <p>S106 funds - no guarantee they would be used to improve the infrastructure needed at St Athan.</p> <p>S106 funding to be kept for village improvements.</p> <p>Existing roads are poorly maintained.</p> <p>Ensure that the necessary infrastructure needed to successfully integrate.</p> <p>Unsuitable infrastructure for future ULEVs.</p>	<p>S106 contributions can be sought from developers towards the costs of providing community and social infrastructure, the need for which has arisen as a result of a new development taking place. S106 monies may only be spent on facilities where the new development has, at least in part, contributed to the need for the facilities. In this regard contributions must be spent on improvements to infrastructure where this is directly related to the proposed development, it cannot be spent elsewhere or on items that are not a direct result of the development.</p> <p>Future infrastructure requirements will be integrated within the development sites and where appropriate the provision will be phased in step with the development to ensure the timely provision to meet rising demand such as additional educational provision.</p> <p>New development will be required to provide ULEV infrastructure in accordance with Council policy- this currently requires that all developments provide, as a minimum, 10% of parking for electrical vehicle charging points.</p>	<p>Identify detailed planning contributions to be included in Deposit Plan.</p>

**Lack of Facilities**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>There currently are limited shops in St Athan residents have to travel to access food shopping etc.</p> <p>Land needs to be set aside in development for additional retails units.</p>	<p>The Council shall consider the range of services and facilities to be provided as part of the housing proposals within St Athan with the aim to facilitate improved accessibility to services and facilities. To this end the Council shall be arranging community engagement sessions in respect of Key housing sites proposed within the RLDP. This will provide communities the opportunity to engage with site promoters to identify community aspirations.</p>	<p>N/A</p>

<p>There is already a very real need for a leisure centre/gym/educational centre in the village. If this further development goes ahead then the need is even greater. Will the council provide this facility?</p> <p>Few local employment opportunities. The proposed enterprise zones will not provide sufficient jobs for the increased population.</p>	<p>The Council will also explore potential for multi-use community buildings such as access to facilities that exist within local schools for the benefit of residents.</p> <p>Proposals for additional retail and commercial uses will be considered within the context of the retail evidence undertaken by the Council alongside national policy.</p> <p>St Athan is one of the best located communities in respect of future job opportunities, being located in close proximity to both the Bro Tathan Enterprise Zone and proposed green energy park at the former Aberthaw power station. These sites will make an important contribution in delivering the 5,338 jobs for which the plan makes provision for and will contribute towards meeting future workforce demands.</p>	
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**Need for Development**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>St Athan is not the right place for new development.</p> <p>The level of housing is too high for a large village with few facilities.</p> <p>In view of the lack of public transport, healthcare and educational facilities why was St Athan chosen for 20% of the planned development.</p> <p>There are currently adequate numbers of homes for sale in the area.</p> <p>The proposed number on new houses vastly exceed those required for the potential future job opportunities, without considering the historic fact that</p>	<p>All local authorities within Wales must plan for future population and household growth and publish a Local Development Plan for its area. The housing growth proposed in the Vale of Glamorgan RLDP shall cater for the future population change and household growth that shall occur within the authority between 2021 and 2036.</p> <p>The level and distribution of housing growth in the plan is set out in the Spatial Strategy of the plan, influenced by the acknowledgement that in light of the Climate Emergency, there is a pressing need to for the plan to contribute towards reducing private car usage by ensuring future housing growth is located with settlements that offer the greatest opportunities to reduce the need to travel through the co-location of housing and employment, which is the case in St Athan, and for residents to travel by public transport - consistent with the Vision. In this respect the strategy seeks to capitalise on the potential for improving public transport provision investment offered by the South Wales Metro and Cardiff City Region. In respect of St Athan the RLDP has identified the opportunity for the reintroduction of a train station to support planned economic investments at Bro Tathan and Aberthaw, alongside the key housing sites proposed in the RLDP.</p>	<p>N/A</p>

<p>many workers come from outside the Vale for their work.</p>	<p>The RLDP makes provision for 8,679 dwellings to meet a housing requirement of 7,890 dwellings, as justified within the Preferred Strategy. This requires the allocation of 2,619 dwellings on new sites, alongside the existing supply and projected windfall allowances.</p> <p>The Vale of Glamorgan RLDP highlights that there are high levels of affordable housing need within the Vale of Glamorgan. The areas of acute need are within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhose, Wenvoe and St Athan. Although there are a significant number of people on the waiting list across all areas of the Vale, as evidenced within the Council's Draft Local Housing Market Assessment (2023).</p> <p>The proposed housing developments within St Athan shall make a positive contribution towards meeting affordable housing need. 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.</p> <p>St Athan is one of the best located communities in respect of future job opportunities, being located in close proximity to both the Bro Tathan Enterprise Zone and proposed green energy park at the former Aberthaw power station. These sites will make an important contribution in delivering the 5,338 jobs for which the plan makes provision for and will contribute towards meeting future workforce demands.</p>	
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**Affordable Housing**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Will locals be allocated the houses, or will they go to outsiders?</p> <p>Already sufficient affordable housing for local needs.</p>	<p>The Vale of Glamorgan RLDP highlights that there are high levels of affordable housing need within the Vale of Glamorgan. The areas of acute need are within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhose, Wenvoe and St Athan. Although there are a significant number of people on the waiting list across all areas of the Vale, as evidenced within the Council's Draft Local Housing Market Assessment (2023).</p>	<p>N/A</p>

<p>Why allocate 35% of new houses as 'affordable' housing when the overall goal for the Vale is 23%?</p> <p>There is no build allowance for older persons residential, warden control type houses. St Athan village has an ageing population, many who may wish to stay in the area but when circumstances change.</p> <p>Social Housing - restrictive covenants to prioritise needs of people with ties to the Vale and Key Workers only.</p>	<p>Affordable Housing in the Vale of Glamorgan is allocated via the Homes4U lettings scheme according to a household's need. Applicants are able to request a preferred location that they would prefer to live, which will allow local people to specify St Athan.</p> <p>It would not be acceptable in planning policy terms to place restrictive covenants on market housing restricting homes to Vale residents and key workers.</p> <p>The Council's adopted LDP places a requirement for new housing developments within St Athan to provide 35% of the total number of houses as affordable. This is based on current economic viability evidence. Presently, the Preferred Strategy has calculated that existing housing sites within the land bank supply will have the capacity to deliver some 2,000 dwellings. This figure will be amended to take account of the affordable housing contributions that will be provided on Key Housing Sites identified within the Preferred Strategy following detailed site viability appraisals have been undertaken. The final housing target will set out in the Deposit RLDP.</p> <p>The Council accept that the RLDP cannot address the full extent of the identified affordable housing, but it will seek to maximise its delivery through the policies of the plan, including key allocations and through securing on site affordable housing and promote opportunities for 100% affordable housing.</p> <p>The RLDP acknowledges the need to support the delivery of housing of older people and encourages new housing developments to provide for a range of house types and secure specialist affordable accommodation as detailed within strategic policy SP8 Affordable and Specialist Housing.</p>	
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**Brownfield/greenfield land**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
No previously developed land is incorporated in the RLDP despite	The Adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land, such as that at Barry Waterfront.	N/A

<p>significant brown field sites on the Bro Tathan development.</p> <p>Why cannot a space such as Llandow old airfield (already a large site crying out for improvement) not be developed as a new village?</p>	<p>The Strategy indicates 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.</p> <p>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.</p>	
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### **Well-being**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>No consideration has been given to the health and well-being of the St Athan Community nor in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary, and tertiary care, and the wider health and care system.</p> <p>Health inequalities will undoubtedly be increased by the proposed developments, which will have an unacceptable impact on the community and residential amenities.</p>	<p>The Council is working closely with the Cardiff and Vale Local Health Board who are currently undertaking a needs and capacity assessment of health provision within the Vale of Glamorgan over the plan period. The assessment will assist the LHB to identify potential gaps in provision in the St Athan area, and the Council shall work with the LHB to identify potential opportunities for the provision of health facilities, for example through the provision of facilities on key sites as part of community facilities contributions and or through multi use community buildings.</p> <p>The Council will ensure that all new development shall meet the RLDP wellbeing objective which is supported through the plan with policies that will require wellbeing to be fully considered as part of any development proposals. These will include incorporation of green infrastructure, open spaces, active travel and when identified enhanced access to local health facilities.</p> <p>Policy SP6 the Preferred Strategy recognises the impact that the built environment has on health, and as such seeks to ensure that development proposals promote health and well-being and identifies measures which should be incorporated within the design and layout of developments. These include opportunities that maximise active travel, promote healthy lifestyles, access to green spaces, and explore opportunities for spaces to grow food such as the</p>	<p>N/A</p>

	<p>provision of allotments. The policy also supports the provision of new and enhanced community and healthcare facilities.</p> <p>Additionally, the Council will be producing Supplementary Planning Guidance on health and wellbeing alongside the Deposit Plan which will provide further detail on measures which the Council will require new developments to incorporate.</p>	
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### **Impact on Character**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The plan would increase the size of St Athan by 100% where as other sites are a smaller proportion of existing housing.	The character of the countryside will inevitably change in this location as it will become urbanised. However, as this is an edge of settlement area, the Council shall ensure that the proposed development will integrate with the existing settlement pattern and master planning of the site will be guided by placemaking principles that will consider the relationship of the site to the existing village.	N/A

### **Deliverability**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Residential allocations (at St Athan) cannot be proven deliverable if they rely on the proposed new railway station. It is proposed that these allocations are withdrawn until a future LDP should the new station gain WeITAG support, and a programme is in place for the delivery of that facility.</p> <p>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. We note that two of the Key Sites in St Athan (KS4 and KS5) totalling up to</p>	<p>The deliverability of housing sites within St Athan are not reliant on the deliverability of a train station at St Athan. The proposed housing allocations alongside the anticipated number of new jobs that will be created through the development at Bro Tathan and Aberthaw will provide the critical mass necessary to support the business case for the provision of a new station and has been confirmed by Transport for Wales.</p> <p>In March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train station at St Athan, as identified within the Preferred Strategy.</p>	N/A

<p>1,150 units are dependent upon 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 Council, in conjunction with Transport for Wales, will need to robustly evidence the delivery of the sites and include feasibility work and the funding required to secure the new station in the early phases of developing the key sites.</p>		
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**On-site Issues**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The documents state there are pockets of deprivation in St Athan and the need for better access to facilities (health, leisure, retail etc) but there is no indication on the illustrative plans (SP4 KS4&amp;5) to indicate how this will be achieved.</p> <p>Strategic objectives. With reference to objective 7 Sustainable Transport, it is not clear how paragraphs 2&amp;3 will be achieved looking at the illustrative plans.</p> <p>The proposed vehicular access to the new estate from Gileston Road is not viable and needs to be moved to the B4265.</p>	<p>The Preferred Strategy includes an illustrative layout for the Church Farm site. These layouts are indicative of the scale of the proposed developments, including potential highway and active travel access in relation to the existing highway and pedestrian network.</p> <p>The Council shall require site promoters to undertake further detailed assessment work and plans shall be refined and updated to consider this additional work. This work shall include any matters raised during the consultation on the Preferred Strategy.</p> <p>The Council are also proposing further community engagement sessions in respect of Key housing sites proposed within the RLDP. This will provide communities the opportunity to engage in the placemaking process of both key sites and adjoining areas. Together these will inform master planning of the site and updated masterplans will be published alongside the Deposit RLDP.</p>	<p>N/A</p>



<p>Two of the proposed Active Travel Access are directly onto the busy B4265. This could be a hazard to pedestrians and cyclists.</p> <p>The green lane from the school to the B4265 is many centuries old and is a haven for wildlife (especially butterflies).</p> <p>Site requirements need to be obligatory for the developer and written unambiguously into the relevant contracts.</p> <p>What is the intended purpose of the mixed-use site, and how will it impact existing local businesses?</p> <p>Western part of site (existing LDP allocation) The site could be a positive for the community of St Athan - ensure the development brings forward.</p>		
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**Conformity with RLDP Policy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>None of these policies have been considered when choosing the sites at St Athan and the number of houses proposed for those sites.</p>	<p>The Strategic Policies set out in the Preferred Strategy are directly linked to the strategic objectives. In this regard the plan should be considered as whole as there is a direct correlation between the vision, themes, objectives of the plan and the policies by which the Council shall consider future development proposals.</p>	<p>N/A</p>
<p>The sites at St Athan do not comply with large parts of the Preferred Strategy.</p>	<p>The level and distribution of housing growth in the plan is set out in the Spatial Strategy of the plan, influenced by the acknowledgement that in light of the Climate Emergency, there is a pressing need to for the plan to contribute towards reducing private car usage by ensuring future housing growth is located within</p>	

<p>Contrary to paragraph 6.3 to re-use previously developed land.</p> <p><b>Mental and Physical Health &amp; Wellbeing</b> - there are no facilities, and none proposed.</p> <p>SP6- Creating Healthy and Inclusive Places and Spaces- The proposals for development at St Athan are complete contradiction with this principle.</p> <p>SP7: Sustainable Transport- Public transport is woeful in St Athan, no car park and many parking violations. The South Wales Metro assumes a station at St Athan, but no other improvements.</p> <p>The proposed development will increase the St Athan population by about 60% which will change the whole character of the community. How does this comply with SP5 Placemaking Bullet point A (Green Infrastructure).</p> <p>SP18: Green Infrastructure - There do not appear to be any proposals to include green spaces in the development at St Athan.</p> <p>The proposals are contrary to SP19 Biodiversity-the proposals would not benefit nature.</p>	<p>settlements that offer the greatest opportunities to reduce the need to travel through the co-location of housing and employment, which is the case in St Athan, and for residents to travel by public transport - consistent with the Vision.</p> <p>The strategy seeks to capitalise on the potential for improving public transport provision investment offered by the South Wales Metro and Cardiff City Region. In respect of St Athan, the RLDP has identified the opportunity for the reintroduction of a train station to support planned economic investments at Bro Tathan and Aberthaw, alongside the key housing sites proposed in the RLDP.</p> <p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.</p> <p><b>Previous Developed Land</b> The Strategy indicates 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.</p> <p><b>Mental and Physical Health &amp; Wellbeing</b> The Council is working closely with the Cardiff and Vale Local Health Board who are currently undertaking a needs and capacity assessment of health provision within the Vale of Glamorgan over the plan period. The Council is also assessing educational need for each of the key housing sites identified within the Preferred Strategy.</p> <p><b>Placemaking</b> The Preferred Strategy positively supports the principles of placemaking, and the Council shall provide opportunities for the community to actively participate in the master planning of the key sites proposed within St Athan. To this effect, the Council shall be arranging community engagement sessions in respect of Key housing sites prior to the publication of the Deposit RLDP. This will provide</p>	
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	<p>communities the opportunity to engage in the placemaking process of both key sites and adjoining areas. This consultation will inform the outline masterplans which will be included in the Deposit RLDP</p> <p><b>Green Infrastructure and Biodiversity</b>  Site allocations will set out what green infrastructure at the site will be protected and where biodiversity net-benefits will be achieved. At this stage principles for protection and net-benefits at the site can be established through site master planning which will be published alongside the Deposit Plan.</p>	
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**Conformity of site with Vision and Objectives**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The vision for St Athan regarding proposed development is out of keeping for the village and the area- limited services and facilities.</p> <p>Proposals will have an adverse impact on all key characteristics - population, health and wellbeing, education, connectivity, economy and employment tourism, retail, the natural environment, climate.</p> <p>Change and flood risk. Too many people concentrated in one area with lack of infrastructure and facilities and reduction in greenfield sites.</p> <p>Contrary to Objective 1- Mitigating and Adapting to Climate Change. Proposals will increase car journeys even with a new trains station. Public transport</p>	<p>The Council strongly believe that the site aligns with the Preferred Strategy. With regard to the Vision, an integral part is housing growth that delivers homes for all. Fundamentally, without the delivery of housing the intention of the Vision cannot be achieved. Ultimately, that delivery does lead to the need for issues to be balanced in some cases. However, through aligning with the drafted strategic policies within the Preferred Strategy and national planning policy, particularly on placemaking, it will be ensured that the site conforms with the Vision in its entirety.</p> <p>The strategic objectives of the Preferred Strategy have been developed through an assessment of the key issues that the plan seeks to address. These objectives are directly linked to the strategic policies set out in the Preferred Strategy. In this regard, the plan should be considered as whole as there is a direct correlation between the objectives of the plan and the policies by which the Council shall consider future development proposals. This shall include the master planning of sites.</p> <p><b>Objective 1 Mitigating and Adapting to Climate Change</b> - The RLDP strategy seeks to mitigate the impact of future planned growth through concentrating this growth within settlements that offer good public transport connectivity. The plan also contains a number of policies aimed at ensuring future growth incorporates active travel and green infrastructure, that homes are built to high sustainability</p>	<p>N/A</p>

<p>needs to be reliable, and importantly go to where people need to travel.</p> <p>Objective 2 - Improving Mental and Physical Health and Well-being - Whilst a good objective, the RLDP makes no provision for inclusive and accessible environments and access to necessary healthcare facilities in St Athan.</p> <p>Objective 3. Homes for All - St Athan already has sufficient affordable homes for local needs.</p> <p>Contrary to Objective 4 – Placemaking. St Athan already has a sense of place apart from lack of school places and healthcare facilities and possibly retail outlets. Further development will make it no longer feel like a Vale village but more like a town.</p> <p>Contrary to Objective 5 – Protecting and Enhancing the Natural Environment- building houses on green fields at St Athan. Proposals will not contribute to this.</p> <p>Objective 6. – Embracing Culture and Heritage - The proposed new developments will result in harmful changes to St Athan’s historic environment.</p>	<p>credentials, and that appropriate measure are taken to reduce and mitigate the risk of flooding.</p> <p><b>Objective 2- Improving Mental and Physical Health and Well-being</b> - The Council will ensure that all new development shall meet the RLDP wellbeing objective which is supported through the plan with policies that will require wellbeing to be fully considered as part of any development proposals. These will include incorporation of green infrastructure, open spaces, active travel and when identified enhanced access to local health facilities.</p> <p><b>Objective 3. Homes for All</b> - the Vale of Glamorgan RLDP highlights that there are high levels of affordable housing need within the Vale of Glamorgan. The areas of acute need are within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhoose, Wenvoe and St Athan.</p> <p><b>Objective 4 – Placemaking Objective 4 –</b> the Council is currently assessing infrastructure requirements associated with key sites, including any opportunities for improving access to services.</p> <p><b>Objective 5 – Protecting and Enhancing the Natural Environment-</b> There is a legislative requirement for the RLDP to achieve biodiversity net gain where development is proposed, and this is reflected within the wording of Objective 5.</p> <p><b>Objective 6 - Embracing Culture and Heritage</b> - National planning policy places a requirement of planning authorities to protect the historic environment, placing a strong presumption against development which could damage the character and appearance of listed buildings and conservation areas. In assessing candidate sites, the Council has ensured that the built environment has been protected by discounting any sites that were deemed to have a negative impact on the historic built environment.</p> <p><b>Objective 7. – Fostering Diverse, Vibrant and Connected Communities-</b> The Council have projected that over the plan period the working population within the Vale of Glamorgan shall increase by 4,875 persons as a result of the housing growth proposed through the Preferred Strategy. This closely aligns with the 5,338</p>	
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<p>Objective 7. – Fostering Diverse, Vibrant and Connected Communities- The proposed number on new houses vastly exceed those required for the potential future job opportunities.</p> <p>Objective 8 – Promoting Active and Sustainable Travel Choices - St Athan is not a location that is accessible by a choice of modes of transport.</p> <p>Objective 9. – Building a Prosperous and Green Economy he proposed 1400 houses vastly exceed the employment opportunities in St Athan, where the new industry will be green using computers and A I to operate resulting in lower job levels.</p> <p>Objective 10 – Promoting Sustainable Tourism.</p> <p>Over development of places like St Athan combined with the lack of public transport, facilities and infrastructure only serves to detract from the area reducing the experience for visitors and residents.</p>	<p>jobs that could be supported through the forecast employment land requirements over the same period. Additional local employment opportunities will also be created through the redevelopment of Aberthaw power station.</p> <p><b>Objective 8 – Promoting Active and Sustainable Travel Choices</b> - The strategy seeks to capitalise on potential for improving public transport provision investment offered by the South Wales Metro and Cardiff City Region. In respect of St Athan the RLDP has identified the opportunity for the reintroduction of a train station to support planned economic investments at Bro Tathan and Aberthaw, alongside the key housing sites proposed in the RLDP. These proposals have provided the critical mass necessary to support the business case for the provision of a new station and has been confirmed by transport for Wales. In March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train station at St Athan, as identified within the Preferred Strategy.</p> <p><b>Objective 9. – Building a Prosperous and Green Economy</b> - The Council have projected that over the plan period the working population within the Vale of Glamorgan shall increase by 4,875 persons as a result of the housing growth proposed through the Preferred Strategy. This closely aligns with the 5,338 jobs that could be supported through the forecast employment land requirements over the same period. Additional local employment opportunities will also be created through the redevelopment of Aberthaw power station. This also excludes the creation of supply employment associated with key employment sites identified within the Preferred Strategy.</p> <p><b>Objective 10 – Promoting Sustainable Tourism</b>- The RLDP will seek to ensure that appropriate services and facilities are provided where new development is proposed, including public transport and active travel such as those identified within the preferred strategy.</p>	
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**Conformity with Council Policy**

Issue raised	Council response	Action
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<p>The RLDP as a whole do not meet the Vale of Glamorgan's own 5 ways of working and the policy on the climate emergency, Project Zero, by not engaging fully with stakeholders such as the Community Council.</p> <p>Is very likely to be in breach of the Wellbeing of Future Generations Act.</p>	<p>During the preparation of the Preferred Strategy the Council held a series of community engagement sessions on the key elements of the Preferred Strategy. Ward members, town and community councils and the Vale of Glamorgan Public Service Board were invited. These sessions covered the Vision, Aims and Objectives for the Plan, Growth and Strategy Options and Key Housing Sites.</p> <p>Engagement sessions were also held during the first 2 weeks of the preferred strategy consultation and were open to all members of the public as well as the aforementioned bodies. An in person drop-in engagement session was also held in St Athan during the 10-week consultation period. These consultation and engagement arrangements are consistent with the Council's agreed Delivery Agreement and Community Involvement Scheme.</p> <p>In terms of the 5 ways of working, the Preferred strategy has been prepared as in the following manner:</p> <p><b>Long term</b> – The RLDP Preferred Strategy 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.</p> <p><b>Prevention</b> – The Preferred Strategy 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.</p> <p><b>Integration</b> – The RLDP Preferred Strategy 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 numerous external organisations and agencies. Accordingly, it is recognised that they will all play an important role in the preparation of the RLDP. The RLDP will also be prepared in accordance with a range of national Planning Policy and guidance as well as environmental, social and economic evidence gathered as part of the Councils Integrated Sustainability Appraisal.</p>	<p>N/A</p>
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	<p><b>Collaboration</b> - The RLDP is subject to extensive statutory consultation in accordance with the LDP Regulations 2005 (as amended 2015) and the Development Plans Manual (Edition 3, 2020). 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. The RLDP must also consider the impact of the RLDP on neighbouring local authorities, the Council is involved in several regional working groups which will influence the evidence base and emerging policies.</p> <p><b>Involvement</b> - 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.</p> <p>Background Paper 4 on the Assessment of the Preferred Strategy against the Tests of Soundness provides evidence of how the PS has had regard for the Well-being Goals. Reference to how the PS was prepared in accordance with the 5 ways of working is included in Section 3 of the Council report from 20<sup>th</sup> November 2023.</p>	
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**Miscellaneous**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Lack of prior consultation with the local community.</p> <p>Refusing to meet with St Athan community council to discuss the proposals does not comply with paragraph 6.78.</p> <p>St Athan is excluded for taking part in Placemaking as it is not a town and the Vale of Glamorgan.</p>	<p>During the preparation of the Preferred Strategy the Council held a series of community engagement sessions on the key elements of the Preferred Strategy. Ward members, town and community councils and the Vale of Glamorgan Public Service Board were invited. These sessions covered the Vision, Aims and Objectives for the Plan, Growth and Strategy Options and Key Housing Sites.</p> <p>Engagement sessions were also held during the first 2 weeks of the preferred strategy consultation and were open to all members of the public as well as the aforementioned bodies. An in person drop-in engagement session was also held in St Athan during the 10-week consultation period. Full details of these arrangements are as follows:</p>	<p>Arrange community engagement sessions in respect of Key housing sites to discuss placemaking.</p>

<p>The Vale of Glamorgan needs to engage with residents, St. Athan Community Council and Ward members to solve the issue created from the previous LDP and determine what infrastructure is required for any future developments.</p> <p>The Vale of Glamorgan has not fully engaged with the parties they are required to in the conditions of the Revised Delivery Agreement.</p>	<ul style="list-style-type: none"> <li>• A workshop for Community Councils was held on the 21st of October 2022 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 sets the direction of the RLDP up to 2036. Town and Community Council Clerks were welcomed to either attend themselves or send a representative on behalf of their organisation. Despite invitation, St Athan Community Council did not attend this session.</li> <li>• A workshop for Town and Community Councils was held on the 8th of February 2023 to inform the growth and spatial options taken forward and identified in the Preferred Strategy. Town and Community Council Clerks were welcomed to either attend themselves or send a representative on behalf of their organisation. Despite invitation, St Athan Community Council did not attend this session.</li> </ul> <p>On both occasions, 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.</p> <p>Following on from these pre-consultation engagement sessions, the Council held a Town and Community Council Online Briefing Session on Wednesday 29th November 2023 in advance of the Preferred Strategy consultation start date (Wednesday 6th December 2023) to provide awareness of the implications of the Preferred Strategy and its content, as well as provide details on the consultation process and associated engagement. St Athan Community Council were invited, and representatives attended.</p> <p>It is inaccurate to state that the Council has not afforded Community Councils, including St Athan Community Council, the opportunity to discuss and comment on the emerging plan.</p> <p>The Preferred Strategy is the first formal consultation opportunity for residents to have their say on the proposals in the Preferred Strategy.</p>	
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	<p>The decision to not progress with a placemaking plan for St Athan was taken outside of the Preferred Strategy. Unfortunately, the funding to support placemaking plans was limited to towns which omitted St Athan from qualifying for funding.</p> <p>The Preferred Strategy positively supports the principles of placemaking, and the Council shall provide opportunities for the community to actively participate in the master planning of the key sites proposed within St Athan. To this effect, the Council shall be arranging community engagement sessions in respect of Key housing sites prior to the publication of the Deposit RLDP. This will provide communities the opportunity to engage in the placemaking process of both key sites and adjoining areas. This consultation will inform the outline masterplans which will be included in the Deposit RLDP.</p> <p>The Initial Consultation Report sets out how the Plan has been undertaken in accordance with the RLDP Delivery Agreement.</p>	
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## SP4 KS5 – Land West of St Athan

### Support

Issue raised	Council response	Action
Support for Key Site SP4 KS5 Land to the West of St Athan.	Support is welcomed and comments noted	N/A

### Highways

Issue raised	Council response	Action
<p>Proposals will put additional stress on an already stressed highway system, particularly at the monument junction where there are numerous incidents and near missed every week.</p> <p>Access to site not safe off busy road, there will be accidents.</p> <p>Development will increase traffic flow along the B4265.</p> <p>The road system is inadequate and will cause major problems.</p> <p>No safe pavements, narrow roads, and lack of parking.</p> <p>It appears that no consideration has been made for the increase in traffic through the village or on the link roads.</p>	<p>The Council has undertaken a Stage 1 Strategic Transport Assessment, which largely uses pre-pandemic data, and highlights that there are junction capacity issues in several locations within the Vale of Glamorgan.</p> <p>A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan. This will include updated data, which will consider post-pandemic travel patterns. This will also identify any mitigation that may be required to reduce the impact of the additional traffic from the sites.</p> <p>In terms of highway safety, the Council will require transport assessments to be undertaken for key housing sites. This will include the provision of necessary upgrades to the existing local highway within the vicinity of the site, including junction improvements and traffic management measures. Proposals will also be required to provide safe pedestrian access and integrate active travel measures for walking and cycling.</p> <p>Agreed improvements to the highway network, including the provision of active travel routes, will be phased as the development comes forward. This will be controlled by a legal agreement. Safe access and egress from the site will have to be assured, which shall include improvements to Gileston Road and the B4265 and adjoining routes.</p>	<p>Complete Stage 2 Strategic Transport Assessment.</p> <p>The Council will consider options to ensure that the development will improve existing highway and pedestrian safe, incorporating active travel measures that improve walking and cycling within St Athan.</p>

<p>Safe pedestrian access may be needed along the B4265 to enable people to access the nearest bus stop.</p> <p>There are only very limited parking places in the village with regular illegal parking offences.</p> <p>Poorly maintained roads than cannot cope with the current level of use.</p> <p>Will Gileston Road junction be upgraded as part of this development and how?</p> <p>Two of the proposed Active Travel Access are directly onto the busy B4265. This could be a hazard to pedestrians and cyclists - especially children.</p>		
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### **Sustainable Transport**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Current public transport provision is poor including access to Bro Tathan employment areas.</p> <p>St. Athan has poor public transport, particularly to the major local employment areas of Cardiff and Bridgend.</p> <p>The train station idea has been in play for decades, with a feasibility study</p>	<p>The RLDP Preferred Strategy locates growth in areas that offer the greatest opportunities for residents to access public transport. In this regard, the strategy seeks to capitalise on the potential for improving public transport provision investment offered by the South Wales Metro and Cardiff City Region. In respect of St Athan the RLDP has identified the opportunity for the reintroduction of a train station to support planned economic investments at Bro Tathan and Aberthaw, alongside the key housing sites proposed in the RLDP.</p> <p>To this end, the Council has actively engaged with Transport for Wales in developing the proposals, and in March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train</p>	<p>Identify active travel connections through master planning and identify potential enhancements to public transport provision.</p> <p>Identify timescales for detailed feasibility work on</p>

<p>being undertaken by VOG in 2022 - which was not pursued.</p> <p>Will the proposed train station be determined before the planning permission is granted and started to coincide with the development?</p> <p>Concerns that the proposed station at St Athan might not go ahead which would result in the development having adverse impacts on St Athan by way of increased congestion and further pressure on poor junctions.</p> <p>Without the railway station the settlement cannot be considered sustainable in terms of transport and movement criteria.</p> <p>There are public transport links in the form of a bus service from the village, but the nearest station is Llantwit Major, service are too inconvenient and time consuming for commuting.</p> <p>There are no active travel routes from Cowbridge to St Athan or Llantwit or between St Athan and Rhoose.</p> <p>There is also no direct bus from St Athan to Cowbridge.</p> <p>Will the safe routes to school plan be extended from Gileston village?</p>	<p>station in St Athan, as identified within the Preferred Strategy. The Council are also exploring the potential for the provision of a park and ride facility at St Athan to enable improved access to train services at Llantwit Major in the interim prior to the development of the St Athan station.</p> <p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.</p> <p>Master planning of the site shall include the provision of active travel improvements within and surrounding the site. These improvements would have the purpose of making active travel a safer option for journeys and provide opportunities for improved accessibility from the site and the wider area. These will be explored as part of the master planning of the site.</p> <p>In respect of walking distances, the proposed location for the St Athan rail station will be well within a 20-minute walking distance of this site.</p>	<p>proposed St Athan train station.</p>
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St Athan is not within a 20-minute walk to a proposed rail station.		
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### **Flooding and Drainage**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p><b>Drainage:</b></p> <p>There is no facility for expansion in the sewerage system with raw sewage being released into the sea, the increase in housing will exacerbate this issue.</p> <p>Llantwit Major sewage works is overloaded, discharging untreated sewage into the Colhuw stream. It clearly cannot take the extra sewage from St Athan without upgrade.</p>	<p>The Council has consulted Dwr Cymru Welsh Water (DCWW) to identify existing water and mains sewage capacity issues within the Vale of Glamorgan, including the capacity requirements for the site West of St Athan. DCWW have advised that there is limited capacity to waste water treatment work to accommodate the site and future investment will be required. Developers will be required to fund the necessary assessment to determine the extent of the additional upgrades to the network at the pre planning stage.</p>	<p>N/A</p>
<p><b>Flood Risk:</b></p> <p>B4265 is prone to severe flooding along all routes.</p>	<p>The Council shall require the developer of the site to undertake a high-level Flood Risk and Drainage Assessment to identify potential flood risks associated with the site. The Council's Drainage Team and Natural Resources Wales will have to be satisfied that the drainage and flooding measures proposed on site are sufficient to deal with the associated risk prior to any development taking place.</p> <p>Whilst the Lead Local Flood Authority is aware of historic instances of localised highway flooding on the B4265 to the south-west of the development the flooding to date has not been significant enough to trigger a formal section 19 report and localised drainage improvement works have recently been undertaken to reduce run-off onto the carriageway. No instances of severe flooding have been recorded in the immediate vicinity of the proposed access / egress points to the development and there is no significant modelled flood risk at these locations.</p>	<p>The Council, including the SuDS Approval Body, will work with the developer and NRW to ensure that that flood risk both on and offsite is appropriately managed.</p>

	<p>Since 2019 Sustainable Drainage Systems (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 detriment offsite</p>	
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**Environmental/Countryside Harm**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>How does the council plan to protect the ecology of the local environment, especially the Heritage coastline?</p> <p>There is no net biodiversity benefit due to the loss of the green field sites.</p> <p>Clive Road Field, St Athan has been used by the community of East Camp, Eglwys Brexit and the village for many years as a safe open space for leisure, exercise, dog walking and child play.</p> <p>The hedges have provided habitat for local species nesting, foraging and corridors. This area is not appropriate for development.</p>	<p>A preliminary ecological assessment has been received for the site, which shows the site is improved grassland with a small area of scattered hawthorn scrub, both of which are habitats of low conservation importance. The site is bounded primarily by intact species and poor hedgerows. NRW did not raise concerns as part of the Preferred Strategy consultation but had submitted previous comments on the site as part of the candidate site process identifying that any application for this site would need to be supported by up-to-date ecological survey information, determined in liaison with the Local Authority Ecologist. There were records of European Protected Species, including dormouse, in the area. Further consideration will be given to ensuring the biodiversity net benefit as the design and layout of the site progresses.</p> <p>National planning policy and proposed policy within the RLDP on green infrastructure is strong. Any future development at the site would have to comply with this and resultantly it is considered that a suitable scheme that protects key green infrastructure features and provides a biodiversity net benefit can be achieved.</p> <p>Broadly, the site allocation will set out what green infrastructure at the site will be protected and where biodiversity net-benefits will be achieved. This will include the provision of formal and informal recreational public open spaces accessible from existing adjoining areas. More detail on this will be determined during</p>	<p>Detailed net biodiversity benefits to be identified and integrated within site masterplan</p>

	planning applications for the site. Nevertheless, at this stage principles for protection and net-benefits at the site can be established through site master planning which will be published alongside the Deposit Plan.	
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### **Infrastructure**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Dwr Cymru Welsh Water comments: Water supply: • A HMA will be required to establish the impact of the proposal on the existing water network and potential developers would be expected to fund investigations during pre-planning stages.</p> <p>Public sewerage networks • A HMA will be required to determine the point of connection to the public sewerage system and potential developers would be expected to fund investigations during pre-planning stages.</p> <p>WwTW • The site falls within the catchment area of West Aberthaw (WwTW) which has limited capacity to accommodate the domestic foul flows from this site.</p>	<p>The Council will continue to engage with Dwr Cymru Welsh Water on the infrastructure requirements for the development site to ensure that adequate utilities provision is available.</p>	<p>Continue to continue to engage with Dwr Cymru Welsh Water on the infrastructure requirements for the development site to ensure that adequate utilities provision is available.</p>
<p><b>Education</b></p> <p>Unlikely that St Athan Primary School can accommodate the addition demand for school places.</p>	<p>The Council has undertaken an initial assessment of educational need for each of the key housing sites identified within the Preferred Strategy. Further detailed assessment of the demand for additional educational provision generated from the proposed housing growth, as well as changes in the projected school age population over the plan period is currently being undertaken by the Council's Education Department. The final details of the required provision arising from</p>	<p>The Deposit Plan will be supported by a background paper which will consider the impact of new development on</p>

<p>The local primary school is already oversubscribed, as too are the local secondary schools.</p> <p>Not enough catchment school places available.</p> <p>Will St Athan school receive extra educational grants to build extra classrooms and thereby enable all local residents to send their children to local schools?</p> <p>These plans MUST include a new school, new GP, as well as new and improved public transport, otherwise existing provision will be swamped by new residents, and the environment negatively impacted.</p>	<p>each of the proposed housing sites will be set out within the Deposit Plan, including site specific contributions towards education arising from key site allocations.</p>	<p>school capacity and how this can be addressed.</p>
<p><b>Health Provision:</b></p> <p>The proposal would have a negative impact of existing facilities which are already at capacity (GPs, Schools etc).</p> <p>Proposals need to be supported by adequate infrastructure such as doctors, schools, transport, and leisure facilities, none of which are covered in these proposals.</p> <p>GP surgeries-Will these be expanded to allow for the extra capacity?</p>	<p>The Council is working closely with the Cardiff and Vale Health Board who are currently undertaking a needs and capacity assessment of health provision within the Vale of Glamorgan over the plan period. This work includes assessing existing capacity and service demand, the potential demand for health services resulting from population and demographic changes over the plan, and potential impact on health services where key housing sites are identified within the Preferred Strategy. The assessment will assist the LHB to identify potential gaps in provision and inform the Council where there are potential opportunities for the provision of health facilities within the RLDP 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.</p>	<p>The Council will continue to liaise with CAVUHB.</p> <p>The Deposit Plan will be supported by a background paper which will consider the impact of new development on health services and how this can be addressed.</p>



<p>These plans MUST include a new school, new GP, as well as new and improved public transport, otherwise existing provision will be swamped by new residents, and the environment negatively impacted.</p> <p>Healthcare facilities in St Athan are limited and fully stretched. Only sub-surgeries and no dentist. Patients have to travel four miles to Llantwit Major with limited public transport to obtain services.</p>		
<p><b>Other Infrastructure Issues:</b></p> <p>Infrastructure requirement must be mandatory for the development and written unambiguously into the relevant contracts.</p> <p>Ensure that the necessary infrastructure needed to successfully integrate with the development.</p> <p>Need to ensure adequate facilities are provided to support proposed developments.</p> <p>No development should take place without full confirmation and commitment to vastly improved infrastructure and support for current inhabitants.</p>	<p>S106 contributions can be sought from developers towards the costs of providing community and social infrastructure, the need for which has arisen as a result of a new development taking place. S106 monies may only be spent on facilities where the new development has, at least in part, contributed to the need for the facilities. In this regard contributions must be spent on improvements to infrastructure where this is directly related to the proposed development, it cannot be spent elsewhere or on items that are not a direct result of the development.</p> <p>Future infrastructure requirements will be integrated within the development sites and where appropriate the provision will be phased in step with the development to ensure the timely provision to meet rising demand such as additional educational provision.</p> <p>The Council will also explore potential for multi-use community buildings such as access to facilities that existing within local schools for the benefit of residents.</p>	<p>Identify detailed planning contributions to be included in Deposit Plan.</p>

<p>There is not sufficient infrastructure to support the allocations and the sites should be deallocated from the RLDP.</p> <p>Any developments should be amenity led to ensure that the supporting infrastructure is in place at the same time that the houses are built.</p> <p>Leisure/educational amenities: There is already a very real need for a leisure centre/gym/educational centre in the village. Will the council provide this facility?</p> <p>S106 funding to be kept for village improvements, better access points so as not to create more congestion at key times, improved public transport, better village parking, more GPs, flooding and sewage mitigation.</p>		
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**Lack of Facilities**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>There is no consideration to local infrastructure – new retail, commercial premises, schooling, health, or leisure facilities.</p> <p>St Athan has only one primary school, only a part-time doctor’s surgery, and only two small shops.</p>	<p>The Council shall consider the range of services and facilities to be provided as part of the housing proposals within St Athan with the aim to facilitate improved accessibility to services and facilities. To this end the Council shall be arranging community engagement sessions in respect of Key housing sites proposed within the RLDP. This will provide communities the opportunity to engage with site promoters to identify community aspirations.</p> <p>The Council will also explore potential for multi-use community buildings such as access to facilities that existing within local schools for the benefit of residents.</p>	<p>Identify detailed planning contributions to be included in Deposit Plan.</p>

<p>There currently are limited shops in St Athan residents have to travel to access food shopping etc.</p> <p>Only small corner type shops are included in the plan, why is the plan not incorporating more facilities to allow more local choice?</p> <p>Land needs to be set aside in development for additional retails units.</p> <p>There is already a very real need for a leisure centre/gym/educational centre in the village. If this further development goes ahead then the need is even greater. Will the council provide this facility?</p> <p>Land needs to be set aside in development for additional retails units, which otherwise will be absorbed into extra housing.</p>	<p>Proposals for additional retail and commercial uses will be considered within the context of the retail evidence undertaken by the Council alongside national policy.</p>	
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**Need for Development**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>No likelihood of additional jobs in the area in the short term.</p> <p>The proposed additional housing vastly exceeds the job potential at CCR Aberthaw Power Station &amp; Bro Tathan.</p>	<p>St Athan is one of the best located communities in respect of future job opportunities, being located in close proximity to both the Bro Tathan Enterprise Zone and proposed green energy park at the former Aberthaw power station. These sites will make an important contribution in delivering the 5,338 jobs for which the plan makes provision for and will contribute towards meeting future workforce demands.</p>	<p>N/A</p>

The proposed enterprise zones will not provide sufficient jobs for the increased population.		
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### **Affordable Housing**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Will locals be allocated the houses, or will they go to outsiders?</p> <p>Already sufficient affordable housing for local needs.</p> <p>Why allocate 35% of new houses as 'affordable' housing when the overall goal for the Vale is 23%?</p> <p>There is no build allowance for older persons residential, warden control type houses. St Athan village has an ageing population, many who may wish to stay in the area but when circumstances change.</p> <p>Social Housing - restrictive covenants to prioritise needs of people with ties to the Vale and Key Workers only.</p>	<p>The Vale of Glamorgan RLDP highlights that there are high levels of affordable housing need within the Vale of Glamorgan. The areas of acute need are within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhoose, Wenvoe and St Athan although there are a significant number of people on the waiting list across all areas of the Vale, as evidenced within the Council's Draft Local Housing Market Assessment (2023).</p> <p>The Council's adopted LDP places a requirement for new housing developments within St Athan to provide 35% of the total number of houses as affordable. This is based on current economic viability evidence. Presently the Preferred Strategy has calculated that existing housing sites within the land bank supply will have the capacity to deliver some 2,000 dwellings. This figure will be amended to take account of the affordable housing contributions that will be provided on Key Housing Sites identified within the Preferred Strategy following detailed site viability appraisals have been undertaken. The final housing target will be set out in the Deposit RLDP.</p> <p>The proposed housing developments within St Athan shall make a positive contribution towards meeting affordable housing need. 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.</p> <p>The RLDP acknowledges the need to support the delivery of housing of older people and encourages new housing developments to provide for a range of house types and secure specialist affordable accommodation as detailed within strategic policy SP8 Affordable and Specialist Housing.</p>	<p>Identify detailed affordable housing contributions to be included in Deposit Plan.</p>

### **Brownfield/greenfield land**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Loss of green sites.</p> <p>Greenfield site which should be a last resort after other developed sites have been considered.</p> <p>The plan breaches clause 6.3 to re-use previously developed land.</p> <p>There are plenty of brown field sites that could be set for development such as on the RAF site, Llandow, Aberthaw. Greenfield sites which should be a last resort after other developed sites have been considered.</p>	<p>The Adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land, such as that at Barry Waterfront.</p> <p>The Strategy indicates that there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth for the within the Vale of Glamorgan over the plan period and accepts that greenfield land will also therefore need to be released.</p> <p>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.</p>	<p>N/A</p>

### **Well-being**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>No consideration has been given to the health and well-being of the St Athan Community nor in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system.</p> <p>Health inequalities will undoubtedly be increased by the proposed developments, which will have an</p>	<p>The Council is working closely with the Cardiff and Vale Local Health Board who are currently undertaking a needs and capacity assessment of health provision within the Vale of Glamorgan over the plan period. The assessment will assist the LHB to identify potential gaps in provision in the St Athan area, and the Council shall work with the LHB to identify potential opportunities for the provision of health facilities, for example through the provision of facilities on key sites as part of community facilities contributions and or through multi use community buildings.</p> <p>The Council will ensure that all new development shall meet the RLDP wellbeing objective which is supported through the plan with policies that will require wellbeing to be fully considered as part of any development proposals. These will</p>	<p>Continue to engage with Cardiff and Vale Local Health Board to identify health provision needs within the locality and identify opportunities for health service provision should the need arise.</p>

<p>unacceptable impact on the Community and residential amenities.</p> <p>The numbers of houses planned will adversely affect the quality of life for existing residents i.e. stretch services, increase congestion, etc.</p>	<p>include incorporation of green infrastructure, open spaces, active travel and when identified enhanced access to local health facilities.</p> <p>Policy SP6 the Preferred Strategy recognises the impact that the built environment has on health, and as such seeks to ensure that development proposals promote health and well-being and identifies measures which should be incorporated within the design and layout of developments. These include opportunities that maximise active travel, promote healthy lifestyles, access to green spaces, and explore opportunities for spaces to grow food such as the provision of allotments. The policy also supports the provision of new and enhanced community and healthcare facilities.</p> <p>Additionally, the Council will be producing Supplementary Planning Guidance on health and wellbeing alongside the Deposit Plan which will provide further detail on measures which the Council will require new developments to incorporate that provide healthy environments and promote healthier lifestyles.</p>	<p>Publish new Supplementary Planning Guidance on health and wellbeing alongside the Deposit Plan, ensuring site allocations adhere to the guidance.</p>
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### **Impact on Character**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The current developments in St. Athan are excessive and being on the back of previous large-scale developments will cause excessive harm to the structure and social cohesion of the community.</p>	<p>The character of the countryside will inevitably change in this location as it will become urbanised. However, as this is an edge of settlement area, the Council shall ensure that the proposed development will integrate with the existing settlement pattern and master planning of the site will be guided by placemaking principles that will consider the relationship of the site to the existing village.</p>	<p>Masterplans to be guided by placemaking principles that will consider the relationship of the site to the existing village.</p>

### **Deliverability**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Residential allocations (at St Athan) cannot be proven deliverable if they rely</p>	<p>The deliverability of housing sites within St Athan are not reliant on the deliverability of a train station at St Athan. The proposed housing allocations</p>	<p>The Council shall work closely with the</p>

<p>on the proposed new railway station. It is proposed that these allocations are withdrawn until a future LDP should the new station gain WeITAG support, and a programme is in place for the delivery of that facility.</p> <p>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. We note that two of the Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units are dependent upon 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 Council, in conjunction with Transport for Wales, will need to robustly evidence the delivery of the sites and include feasibility work and the funding required to secure the new station in the early phases of developing the key sites.</p>	<p>alongside the anticipated number of new jobs that will be created through the development at Bro Tathan and Aberthaw will provide the critical mass necessary to support the business case for the provision of a new station and has been confirmed by Transport for Wales.</p> <p>In March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train station in St Athan, as identified within the Preferred Strategy.</p> <p>The Council shall work closely with the Department of Transport in the undertaking of the feasibility work and identify a timetable for this and future related work.</p>	<p>Department of Transport in the undertaken of the feasibility work and identify timetable for this and future related work.</p>
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**On-site Issues**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The documents state there are pockets of deprivation in St Athan and the need for better access to facilities (health, leisure, retail etc) but there is no indication on the illustrative plans to indicate how this will be achieved.</p>	<p>The Preferred Strategy includes an illustrative layout for the land West of St Athan. This layout is indicative of the scale of the proposed developments, including potential highway and active travel access in relation to the existing highway and pedestrian network.</p>	<p>Require site promoters to undertake further detailed assessment work and plans shall be refined and</p>

<p>With reference to objective 7 Sustainable Transport, it is not clear how this will be achieved looking at the illustrative plans.</p> <p>The site only has one vehicle exit/entrance and on to already congested roads at peak time.</p> <p>The proposals only allow for the provision of one local store to cater for, effectively, a doubling of the population of St Athan.</p> <p>No provision for additional leisure, sport and recreation space.</p> <p>What is the intended purpose of the mixed-use site, and how will it impact existing local businesses?</p> <p>There has to be larger retain outlets to be facilitated to cut down carbon footprint. If we are encouraging young families, we need to encourage more facilities within walking distances.</p>	<p>The Council shall require site promoters to undertake further detailed assessment work and plans shall be refined and updated to consider this additional work. This work shall include any matters raised during the consultation on the Preferred Strategy.</p> <p>The Council are also proposing further community engagement sessions in respect of Key housing sites proposed within the RLDP. This will provide communities the opportunity to engage in the placemaking process of both key sites and adjoining areas. Together these will inform master planning of the site and updated masterplans will be published alongside the Deposit RLDP.</p> <p>Proposals for additional retail and commercial uses will be considered within the context of the retail evidence undertaken by the Council alongside national policy.</p>	<p>updated to consider this additional work. This work shall include any matters raised during the consultation on the Preferred Strategy.</p>
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**Conformity with RLDP Policy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The proposals for St Athan have breached every single one of your own policies.</p>	<p>The Strategic Policies set out in the Preferred Strategy are directly linked to the strategic objectives. In this regard the plan should be considered as whole as there is a direct correlation between the vision, themes, objectives of the plan and the policies by which the Council shall consider future development proposals.</p>	<p>N/A</p>



<p><b>SP5 Placemaking</b> You have chosen to put unsustainable pressure on the community of St Athan without any consultation with the community or its community Council.</p> <p><b>SP18: GREEN INFRASTRUCTURE</b> No placemaking in St Athan, only new buildings, no provision of green infrastructure.</p> <p>All of your proposed sites are greenfield and therefore in breach of your policy. By building on them you are detrimentally reducing the green environment. The proposed sites in St Athan do not include any of these provisions.</p> <p>There do not appear to be any proposals to include green spaces in either development at St Athan.</p> <p><b>SP19: BIODIVERSITY</b> How does this benefit nature?</p>	<p><b>Placemaking</b> The Preferred Strategy positively supports the principles of placemaking, and the Council shall provide opportunities for the community to actively participate in the master planning of the key sites proposed within St Athan. To this effect, the Council shall be arranging community engagement sessions in respect of Key housing sites prior to the publication of the Deposit RLDP. This will provide communities the opportunity to engage in the placemaking process of both key sites and adjoining areas. This consultation will inform the outline masterplans which will be included in the Deposit RLDP.</p> <p><b>Green Infrastructure and Biodiversity</b> Site allocations will set out what green infrastructure at the site will be protected and where biodiversity net-benefits will be achieved. At this stage principles for protection and net-benefits at the site can be established through site master planning which will be published alongside the Deposit Plan.</p>	
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**Conformity of site with Vision and Objectives**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The vision for St Athan regarding proposed development is out of keeping for the village and the area- limited services and facilities.	The Council strongly believes that the site aligns with the Preferred Strategy. With regard to the Vision, an integral part is housing growth that delivers homes for all. Fundamentally, without the delivery of housing the intention of the Vision cannot be achieved. Ultimately, that delivery does lead to the need for issues to be balanced in some cases. However, through aligning with the drafted strategic	N/A

<p>Proposals will have an adverse impact on all key characteristics - population, health and wellbeing, education, connectivity, economy and employment tourism, retail, the natural environment, climate change and flood risk.</p> <p>Too many people concentrated in one area with lack of infrastructure and facilities and reduction in greenfield sites.</p> <p>Contrary to Objective 1- Mitigating and Adapting to Climate Change. Proposals will increase car journeys even with a new trains station. Public transport needs to be reliable, and importantly go to where people need to travel.</p> <p>Objective 2 - Improving Mental and Physical Health and Well-being - Whilst a good objective, the RLDP makes no provision for inclusive and accessible environments and access to necessary healthcare facilities in St Athan.</p> <p>Objective 3. Homes for All - St Athan already has sufficient affordable homes for local needs.</p> <p>Contrary to Objective 4 – Placemaking. St Athan already has a sense of place apart from lack of school places and healthcare facilities and possibly retail outlets. Further development will make</p>	<p>policies within the Preferred Strategy and national planning policy, particularly on placemaking, it will be ensured that the site conforms with the Vision in its entirety.</p> <p>The strategic objectives of the Preferred Strategy have been developed through an assessment of the key issues that the plan seeks to address. These objectives are directly linked to the strategic policies set out in the Preferred Strategy. In this regard the plan should be considered as whole as there is a direct correlation between the objectives of the plan and the policies by which the Council shall consider future development proposals. This shall include the master planning of sites.</p> <p><b>Objective 1 Mitigating and Adapting to Climate Change</b> – The RLDP strategy seeks to mitigate the impact of future planned growth through concentrating this growth within settlements that offer good public transport connectivity. The plan also contains a number of policies aimed at ensuring future growth incorporates active travel and green infrastructure, that homes are built to high sustainability credentials, and that appropriate measure are taken to reduce and mitigate the risk of flooding.</p> <p><b>Objective 2- Improving Mental and Physical Health and Well-being</b> -The Council will ensure that all new development shall meet the RLDP wellbeing objective which is supported through the plan with policies that will require wellbeing to be fully considered as part of any development proposals. These will include incorporation of green infrastructure, open spaces, active travel and when identified enhanced access to local health facilities.</p> <p><b>Objective 3. Homes for All</b> - The Vale of Glamorgan RLDP highlights that there are high levels of affordable housing need within the Vale of Glamorgan. The areas of acute need are within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhoose, Wenvoe and St Athan.</p> <p><b>Objective 4 – Placemaking Objective 4</b> – The Council is currently assessing infrastructure requirements associated with key sites, including any opportunities for improving access to services.</p>	
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<p>it no longer feel like a Vale village but more like a town.</p> <p>Contrary to Objective 5 – Protecting and Enhancing the Natural Environment- building houses on green fields at St Athan. Proposals will not contribute to this.</p> <p>Objective 6. – Embracing Culture and Heritage - The proposed new developments will result in harmful changes to St Athan’s historic environment.</p> <p>Objective 7. – Fostering Diverse, Vibrant and Connected Communities- The proposed number on new houses vastly exceed those required for the potential future job opportunities.</p> <p>Objective 8 – Promoting Active and Sustainable Travel Choices - St Athan is not a location that is accessible by a choice of modes of transport.</p> <p>Objective 9. – Building a Prosperous and Green Economy he proposed 1400 houses vastly exceed the employment opportunities in St Athan, where the new industry will be green using computers and A I to operate resulting in lower job levels.</p>	<p><b>Objective 5 – Protecting and Enhancing the Natural Environment-</b> There is a legislative requirement for the RLDP to achieve biodiversity net gain where development is proposed, and this is reflected within the wording of Objective 5.</p> <p><b>Objective 6 - Embracing Culture and Heritage National</b> - Planning policy places a requirement on planning authorities to protect the historic environment, placing a strong presumption against development which could damage the character and appearance of listed buildings and conservation areas. In assessing candidate sites, the Council has ensured that the built environment has been protected by discounting any sites that were deemed to have a negative impact on the historic built environment.</p> <p><b>Objective 7. – Fostering Diverse, Vibrant and Connected Communities-</b> The Council have projected that over the plan period the working population within the Vale of Glamorgan shall increase by 4,875 persons as a result of the housing growth proposed through the Preferred Strategy. This closely aligns with the 5,338 jobs that could be supported through the forecast employment land requirements over the same period. Additional local employment opportunities will also be created through the redevelopment of Aberthaw power station.</p> <p><b>Objective 8 – Promoting Active and Sustainable Travel Choices.</b> The strategy seeks to capitalise on the potential for improving public transport provision investment offered by the South Wales Metro and Cardiff City Region. In respect of St Athan the RLDP has identified the opportunity for the reintroduction of a train station to support planned economic investments at Bro Tathan and Aberthaw, alongside the key housing sites proposed in the RLDP. These proposals have provided the critical mass necessary to support the business case for the provision of a new station and has been confirmed by transport for Wales. In March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train station in St Athan, as identified within the Preferred Strategy.</p> <p><b>Objective 9. – Building a Prosperous and Green Economy</b> - The Council have projected that over the plan period the working population within the Vale of Glamorgan shall increase by 4,875 persons as a result of the housing growth</p>	
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<p>Objective 10 – Promoting Sustainable Tourism.</p> <p>Over development of places like St Athan combined with the lack of public transport, facilities and infrastructure only serves to detract from the area reducing the experience for visitors and residents.</p>	<p>proposed through the Preferred Strategy. This closely aligns with the 5,338 jobs that could be supported through the forecast employment land requirements over the same period. Additional local employment opportunities will also be created through the redevelopment of Aberthaw power station. This also excludes the creation of supply employment associated with key employment sites identified within the Preferred Strategy.</p> <p><b>Objective 10 – Promoting Sustainable Tourism-</b> The RLDP will seek to ensure that appropriate services and facilities are provided where new development is proposed, including public transport and active travel such as those identified within the preferred strategy.</p>	
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**Conformity with Council Policy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The RLDP as a whole do not meet the Vale of Glamorgan's own 5 ways of working and the policy on the climate emergency, Project Zero, by not engaging fully with stakeholders such as the Community Council.</p> <p>Is very likely to be in breach of the Wellbeing of Future Generations Act.</p>	<p>During the preparation of the Preferred Strategy the Council held a series of community engagement sessions on the key elements of the Preferred Strategy. Ward members, town and community councils and the Vale of Glamorgan Public Service Board were invited. These sessions covered the Vision, Aims and Objectives for the Plan, Growth and Strategy Options and Key Housing Sites.</p> <p>Engagement sessions were also held during the first 2 weeks of the preferred strategy consultation and were open to all members of the public as well as the aforementioned bodies. An in person drop-in engagement session was also held in St Athan during the 10-week consultation period. These consultation and engagement arrangements are consistent with Council's agreed Delivery Agreement and Community Involvement Scheme.</p> <p>In terms of the 5 ways of working, the Preferred strategy has been prepared in the following manner:</p> <p><b>Long term</b> – The RLDP Preferred Strategy 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.</p>	<p>N/A</p>

	<p><b>Prevention</b> – The Preferred Strategy 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.</p> <p><b>Integration</b> – The RLDP Preferred Strategy 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 numerous external organisations and agencies. Accordingly, it is recognised that they will all play an important role in the preparation of the RLDP. The RLDP will also be prepared in accordance with a range of national Planning Policy and guidance as well as environmental, social and economic evidence gathered as part of the Councils Integrated Sustainability Appraisal.</p> <p><b>Collaboration</b> - The RLDP is subject to extensive statutory consultation in accordance with the LDP Regulations 2005 (as amended 2015) and the Development Plans Manual (Edition 3, 2020). 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. The RLDP must also consider the impact of the RLDP on neighbouring local authorities. The Council is involved in several regional working groups which will influence the evidence base and emerging policies.</p> <p><b>Involvement</b> - 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.</p> <p>Background Paper 4 on the Assessment of the Preferred Strategy against the Tests of Soundness provides evidence of how the PS has had regard for the Well-being Goals. Reference to how the PS was prepared in accordance with 5 ways of working is included in Section 3 of the Council report of 20th November 2023.</p>	
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**Miscellaneous**

Issue raised	Council response	Action
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<p>There has been no prior consultation with the community about their needs and how they wish St Athan to develop.</p> <p>No additional effort has been made to consult with any hard-to-reach groups or people within St. Athan.</p> <p>The Vale of Glamorgan needs to engage with residents, St. Athan Community Council and Ward members to solve the issue created from the previous LDP and determine what infrastructure is required for any future developments.</p> <p>St Athan is excluded for taking part in Placemaking as it is not a town and the Vale of Glamorgan representatives have declined to speak to the Community Council.</p>	<p>During the preparation of the Preferred Strategy the Council held a series of community engagement sessions on the key elements of the Preferred Strategy. Ward members, town and community councils and the Vale of Glamorgan Public Service Board were invited. These sessions covered the Vision, Aims and Objectives for the Plan, Growth and Strategy Options and Key Housing Sites.</p> <p>Engagement sessions were also held during the first 2 weeks of the preferred strategy consultation and were open to all members of the public as well as the aforementioned bodies. An in person drop-in engagement session was also held in St Athan during the 10-week consultation period. Full details of these arrangements are as follows:</p> <ul style="list-style-type: none"> <li>• A workshop for Community Councils was held on the 21st of October 2022 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 sets the direction of the RLDP up to 2036. Town and Community Council Clerks were welcomed to either attend themselves or send a representative on behalf of their organisation. Despite invitation, St Athan Community Council did not attend this session.</li> <li>• A workshop for Town and Community Councils was held on the 8th of February 2023 to inform the growth and spatial options taken forward and identified in the Preferred Strategy. Town and Community Council Clerks were welcomed to either attend themselves or send a representative on behalf of their organisation. Despite invitation, St Athan Community Council did not attend this session.</li> </ul> <p>On both occasions, 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.</p> <p>Following on from these pre-consultation engagement sessions, the Council held a Town and Community Council Online Briefing Session on Wednesday 29th November 2023 in advance of the Preferred Strategy consultation start date (Wednesday 6th December 2023) to provide awareness of the implications of the</p>	<p>Arrange community engagement sessions in respect of Key housing sites prior to the publication of the Deposit RLDP.</p>
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	<p>Preferred Strategy and its content, as well as provide details on the consultation process and associated engagement. St Athan Community Council were invited, and representatives attended.</p> <p>It is inaccurate to state that the Council has not afforded Community Councils, including St Athan Community Council, the opportunity to discuss and comment on the emerging plan.</p> <p>The Preferred Strategy is the first formal consultation opportunity for residents to have their say on the proposals in the Preferred Strategy.</p> <p>The decision to not progress with a placemaking plan for St Athan was taken outside of the Preferred Strategy. Unfortunately, the funding to support placemaking plans was limited to towns which omitted St Athan from qualifying for funding.</p> <p>The Preferred Strategy positively supports the principles of placemaking, and the Council shall provide opportunities for the community to actively participate in the master planning of the key sites proposed within St Athan. To this effect, Council shall be arranging community engagement sessions in respect of Key housing sites prior to the publication of the Deposit RLDP. This will provide communities the opportunity to engage in the placemaking process of both key sites and adjoining areas. This consultation will inform the outline masterplans which will be included in the Deposit RLDP.</p> <p>The Initial Consultation Report sets out how the Plan has been undertaken in accordance with the RLDP Delivery Agreement.</p>	
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**Strategic Growth Area Land Bank Sites – Committed and Rolled Forward Housing sites.**

The following committed and rolled forward sites have been subject to representations:

	<b>Respondents</b>	<b>Representations</b>	<b>Support</b>	<b>Object</b>	<b>Comment</b>
SP4 L1 Land West of Pencoedtre Lane, Barry	2	2	0	1	1
SP4 L2 Land adjoining St Athan Road, Cowbridge	35	38	0	33	5
SP4 L4 Former Eagleswell School, Llantwit Major	2	2	0	1	1
SP4 L5 Land between new Northern Access Road and Eglwys Brewis Road (east)	6	6	2	2	2
SP4 L8 Land at Upper Cosmeston Farm, Penarth	5	5	0	4	1
SP4 L9 Land south of Landough Hill/Penarth Road, Llandough	2	2	0	1	1
SP4 L10 Land north of the railway line, Rhoose	3	3	0	2	1



#### SP4 L1 Land West of Pencoedtre, Barry

Issue raised	Council response	Action
Watermains and Sewage pipe locations	Comments noted and continued liaison will take place with Welsh Water on constraints as sites progress.	N/A
Limited progress on planning applications on designated site from previous plan, objection on likelihood of development.	Rolled forward LDP sites. Only sites that have been assessed to be realistically development likely to be developed. Land West of Pencoedtre has been allocated to be the housing development programme and the Council's housebuilding team remain committed to bringing it forward.	N/A

#### SP4 L2 Land adjoining St. Athan Road, Cowbridge

##### Issues Raised Specific to the Preferred Strategy

Issue raised	Council response	Action
<ul style="list-style-type: none"> <li>Automatic inclusion as an existing adopted site does not consider the deficiencies and stipulations accorded to the adopted site in the 2017 LDP.</li> <li>Does not meet the criteria for candidate site selection either for stage 1 or stage 2 using Vale of Glamorgan</li> </ul>	<p>The site is currently the subject of a planning application that is awaiting determination. Whilst the site represents an amendment to the site allocated within the current adopted Vale of Glamorgan Local Development Plan, the principle of the suitability of the site for residential development has been established through the LDP examination.</p> <p>Objections made in respect of the inclusion of the site within the Preferred Strategy have been made on the grounds that the site boundary reflects the planning application, and not the LDP allocation, and that the site should not have been carried forward in the Preferred Strategy and should be removed from the Preferred Strategy.</p> <p>The site is one of a number of existing adopted LDP housing sites that have been carried forward into the Preferred Strategy. These include sites where either</p>	

<p>Replacement Local Development Plan 2021 – 2036 Candidate Site Assessment Methodology June 2022</p> <ul style="list-style-type: none"> <li>• The site has been refused planning permission 3 times previously.</li> <li>• Stage 2 sustainability assessment shows the site has at least three red constraints including, landscape, historic importance, and agricultural land. None of these constraints can be easily mitigated.</li> <li>• Inclusion of this site makes no sense when all other proposed Cowbridge sites were rejected.</li> <li>• The site is not in a suitable location for affordable housing some distance from the town centre, as this would create a ghetto.</li> </ul>	<p>developer interest in bringing forward has been expressed through either the submission of a pre- planning application or where a planning application is currently being considered by the Council, or sites owned by the Council and identified within its housing delivery programme.</p> <p>Conversely, the Council has excluded a number of sites identified within the adopted LDP where deliverability of the sites is questionable due to a lack of developer interest or where site viability issues are known. Accordingly, the identification of the site within the Preferred Strategy is consistent with the Council’s consideration of all existing housing sites which has been undertaken in accordance with the Welsh Government ‘Development Plans Manual: Edition 3’, March 2020 (DPM) methodology for calculating the land supply for the Preferred Strategy.</p> <p>In this regard, pre-application advice was sought from the Council in August 2020 and planning application was submitted in August 2022. At the time of appraising the suitability of existing housing sites, land adjoining St. Athan Road was the subject of a planning application, signifying developer interest of the site.</p> <p>All sites submitted through the Candidate Site Stage have been subject to the Council’s Candidate Site Assessment Methodology. In this regard the amended site (candidate site reference 370) was submitted during the Council’s call for candidate sites which was undertaken between the 17th of June and 13th September 2022. The boundary of the submitted candidate site reflects the amended site boundary which is currently the subject of a planning application reference 2022/00958/FUL.</p> <p>In this regard the site assessment has fully considered the merits of the amended site, and it is this site that has been included within the Preferred Strategy. To say that the Council has simply rolled forward the site without fully considering the site would be incorrect.</p> <p>The outcome of the site and the reasons for the inclusion of the site are set out in the Council’s Preferred Strategy Background Paper 18 Candidate Site Assessment at Preferred Strategy.</p>	
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<ul style="list-style-type: none"> <li>• The proposed site plans do not meet the housing density threshold of 30 houses per hectare.</li> <li>• The site is inconsistent with National Planning Policy and the Preferred Strategy and the objective to reduce car use.</li> <li>• Consider alternative brownfield sites – such as Llandow.</li> <li>• Adequate housing provision within Cowbridge, e.g. Darren Farm as yet to be built out</li> </ul>	<p>The future status of the site within the Preferred Strategy will be considered further following the determination of the planning application by the Council. Removal of the site from the Preferred Strategy as suggested would not be material to the determination of the current planning application.</p> <p>Planning history in respect of the site, and previous refusals were considered under previous local planning policy frameworks. The current planning application is being considered under the present adopted LDP within which the site is identified for residential development. The acceptability of the amended site shall be considered through the determination of the current planning application.</p>	
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**Site Specific Issues Raised Associated with the current planning application**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p><b>Number of Dwellings</b></p> <p>A full planning application has been submitted showing 105 dwellings, this could change subject to addressing and negotiating planning, highway,</p>	<p>Comments noted. If the application is approved, the allocation in the RLDP will reflect the approved dwelling numbers accordingly.</p>	<p>N/A</p>

<p>and drainage requirements for the development.</p>		
<p><b>Environmental Impact</b></p> <ul style="list-style-type: none"> <li>• Negative impact on landscape</li> <li>• Extensive environment damage to the area of special landscape</li> <li>• Negative impact and loss of biodiversity</li> <li>• Loss of important agricultural land- Grades 1,2 and 3a</li> <li>• Loss of green space and community amenities</li> <li>• Impact on climate through increase traffic, loss of green spaces</li> <li>• Proposal is in direct conflict with the Council's improvements to the Thaw Valley.</li> </ul> <p><b>Highway Access Safety &amp; Transport</b></p> <ul style="list-style-type: none"> <li>• Highway access is unsafe, with the only vehicle entry and access via a sharp bend in the road.</li> </ul>	<p>The site is currently the subject of a planning application which is presently being considered by the Council and awaiting determination- reference Land between Windmill Lane and St Athan Road, Cowbridge (2022/00958/FUL).</p> <p>The issues raised through the Preferred Strategy in respect of the site shall be considered through the planning application process. Consideration of the site in the RLDP will reflect the outcome of the planning application.</p> <p>Since 2019 Sustainable Drainage Systems (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 detriment offsite</p>	<p>N/A</p>

<ul style="list-style-type: none"> <li>• Independent safety audit verifies that the highway access to be unsafe and do not satisfy Active Travel Guidance</li> <li>• No pedestrian foot access available and limited access locally e.g at Windmill Lane</li> <li>• Proposal would increase in vehicular traffic and congestion.</li> <li>• Increase parking demand within Cowbridge.</li> <li>• lack of bus services in the locality</li> <li>• poor access to town centre</li> </ul> <p><b>Flooding and Drainage</b></p> <ul style="list-style-type: none"> <li>• Increase in water run-off and extra sewage could lead to extra discharges into the River Thaw.</li> <li>• Site frequently floods after heavy rain</li> </ul> <p><b>Site Specific Issues Raised</b></p> <ul style="list-style-type: none"> <li>• A proposed footpath access via existing</li> </ul>		
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<p>residential area would disturb existing residents' privacy.</p> <ul style="list-style-type: none"> <li>• Loss of current footpath within the site</li> <li>• Potential impacts on archaeological remains that maybe present.</li> </ul> <p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Additional pressure on doctors' surgeries and schools</li> </ul>		
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**SP4 L4 Former Eagleswell school**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Site previously earmarked for medical centre</p>	<p>The site is only allocated for housing in the adopted LDP and it is intended to roll forward this allocation into the RLDP. The site has never been formally identified in a development plan for a medical centre, as prior to its allocation in the adopted LDP, it was a school site.</p> <p>The plan recognises the importance of health facilities in policies SP5 and SP6 which lay out the plans to create healthy and inclusive places and spaces. The Council is liaising with the health board to identify any capacity issues within the Vale and if the need for additional or replacement facilities are identified, we will work with the health board to identify an appropriate site.</p>	<p>N/A</p>

Watermains and Sewage pipe locations	Comments noted and continued liaison will take place with Welsh Water on constraints as sites progress.	N/A

**SP4 L5 Land Between new Northern Access Road and Eglwys Brewis road (East)**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Site is on the edge of a flood plain</p> <p>Impact on wildlife.</p> <p>Environmentally sensitive area.</p> <p>Plenty of brownfield sites at Llandow and St Athan available</p>	<p>As part of the planning application on this site, an ecological assessment and flood consequences assessment were submitted. These issues have been considered as part of the determination of the planning application.</p> <p>St Athan (Bro Tathan) is identified for new employment in the adopted LDP an allocation that is considered to be realistic based on the Council's employment land survey, and one will be rolled forward into the RLDP.</p> <p>Llandow is also protected for employment use. New residential development would need to accord with the RLDP strategy, which focuses development on sustainable locations served by sustainable transport. Development at Llandow would not accord with the strategy.</p>	
<p>This site and adjoining sites L6 and L7 are aspirational not realistic.</p> <p>Location of active rifle range within proximity of site</p>	<p>This site, together with site L7, has planning permission for housing, subject to the signing of a Section 106 agreement, which demonstrates a commitment to develop.</p> <p>Concern about rifle range noted.</p>	
Watermains and Sewage pipe locations	Comments noted and continued liaison will take place with Welsh Water on constraints as sites progress.	N/A
Completion of new road between employment and	Support is welcomed.	N/A

Llantwit major supports the development of this site.		
If commercial retail is required for Llantwit Major, this site could be suitable for both retail and residential.	As an allocated housing site within the adopted LDP, and a site that has planning permission (subject to s106), residential has been identified as the preferred use.	

#### SP4 L8 Land at Upper Cosmeston Farm, Penarth

Issue raised	Council response	Action
<p>Congestion and road capacity</p> <p>Increased risk of flooding</p> <p>Capacity of existing Sewage infrastructure.</p> <p>Land may be needed Severn Barrage development or tidal power .</p> <p>Contamination of site</p> <p>Viability and deliverability not considered.</p>	The site was considered by planning committee in March 2024 where it was resolved to grant planning permission subject to the signing of a Section 106 agreement. These matters were all considerations as part of the planning process. Full details are available in the committee report.	N/A
Watermains and Sewage pipe locations	Comments noted and continued liaison will take place with Welsh Water on constraints as sites progress.	N/A

#### SP4 L9 Land at South of Llandough Hill/Penarth Road



<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Increased congestion</p> <p>Limited health and education facilities</p> <p>Impact on biodiversity and cultural heritage</p>	<p>The site was considered by planning committee in March 2023 where it was resolved to grant planning permission subject to the signing of a Section 106 agreement. These matters were all considerations as part of the planning process. Full details are available in the committee report.</p>	N/A
<p>Watermains and Sewage pipe locations</p>	<p>Comments noted and continued liaison will take place with Welsh Water on constraints as sites progress.</p>	N/A

#### **SP4 L10 Land north of the railway line (East), Rhoose**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Poor transport links</p> <p>Limited health and education facilities</p> <p>No need as currently 70 properties for sale in Rhoose</p> <p>Site has spent significant time in planning phase.</p>	<p>A planning application for the site was submitted in 2022 and is currently awaiting determination. As it is an allocated site in the adopted LDP, the principle of new housing in this location has already been established.</p> <p>There is always a churn in the housing market with people moving for a variety of reasons. In many instances, residents are moving within their own communities. This in itself is not a sign that there is no need for additional housing. The LHMA also identifies that there is a need in Rhoose for affordable housing.</p>	N/A
<p>Watermains and Sewage pipe locations</p>	<p>Comments noted and continued liaison will take place with Welsh Water on constraints as sites progress.</p>	N/A

## SP4: Key Housing-Led Sites

The section below relates to general comments and objections made in respect of key sites.

### General Comments

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Comments provided consultation advice in respect of the safeguarding requirements associated with the 5 key housing sites and 10 employment sites identified within the RLDP which fall within statutory safeguarding zones.	Comments noted.	Consider the statutory consultation requirements set out in the representation.
High level comments made in respect of the key sites regarding Hydraulic Modelling Assessments (HMAs), potential protection measures in the form of easement widths or piper diversions and where there is limited capacity at a Wastewater Treatment Works (WwTW), dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA).	Comments noted.	Consider these comments as part of the preparation of the Deposit RLDP.

### General Objection

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Disagree with all five key sites.  General objection.  No room.	Objection noted.	N/A

### **Impact on Green Infrastructure**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>All five sites are greenfield and break Council's environmental policies.</p> <p>Brownfield sites should be used first e.g. Barry Docks, Llandow.</p> <p>Need to upgrade existing housing stock and acquiring empty properties.</p> <p>Greenfield development will impact on agriculture and wildlife.</p> <p>Policy of building on greenfield sites is contrary to claims to support the environment.</p> <p>Conflict with 'A more resilient and greener Vale'?</p>	<p>It is acknowledged that bringing empty homes back into use is an important priority. There are over 500 long-term empty homes in the Vale of Glamorgan. As set out in the RLDP Preferred Strategy, we are seeking to deliver 7,890 homes. Therefore, bringing back all empty homes into use would not achieve the delivery target. The Council are charging a 150% Council Tax premium on long term empty homes and this is set to increase to 200% in 2025/2026. Therefore, efforts are being made to encourage these homes to be brought back into use.</p> <p>It is apparent that the number of brownfield sites that are ready for housing development within the RLDP plan period is limited. No appropriate candidate sites were promoted on brownfield land during the call for candidate sites that would be considered Key Sites in the RLDP. There are several smaller scale sites that may be allocated for housing; however, these alone would only meet a small portion of the overall housing target. Instead, in order to meet the housing requirement development on greenfield land is required.</p> <p>Whilst it is acknowledged that developments will result in the loss of green infrastructure as justified elsewhere potential harm has to be balanced against allocating sites to meet the housing requirement. National planning policy and proposed policy within the RLDP on green infrastructure is strong. Any future development at the sites would have to comply with this. Green infrastructure implications will be treated through</p>	N/A

<p>The Vale will be over developed with loss of green spaces.</p> <p>Focus should be on regeneration. Building on green areas does not help tackle the climate change crisis. It only leads to more problems.</p> <p>Proposed developments will bring irreversible damage, taking green areas, destroying nature at the detriment of future generations.</p> <p>If genuinely concerned for preserving the environment and biodiversity, then why are there considerations for building houses on farmland and greenfield sites.</p>	<p>a Green Infrastructure Statement for the site. This will have to be submitted prior to the publication of the Deposit Plan, will resolve outstanding issues relating to the SSSI, and will identify where biodiversity net-benefits can be achieved.</p> <p>There are no green belts within the Vale of Glamorgan, and these can only be established through the need for them being identified within Future Wales 'The National Development Plan'. Future Wales does not identify the Vale of Glamorgan as an area where a green belt should be considered.</p>	
<p>Reduces greenbelt.</p>	<p>There are no green belts within the Vale of Glamorgan, and these can only be established through the need for them being identified within Future Wales 'The National Development Plan'. Future Wales does not identify the Vale of Glamorgan as an area where a green belt should be considered.</p>	<p>N/A</p>
<p>Neglects the need to maintain green wedge areas.</p>	<p>It is acknowledged that two of the five key sites are located within a green wedge designation. Green wedges are a local designation that is reviewed as part of the RLDP process. A green wedge review will be undertaken to inform the Deposit Plan but the initial view is that neither of the developments proposed would result in significant harm to the green wedge objectives and would not result in the coalescence of settlements.</p>	<p>N/A</p>

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### **Biodiversity, Ecosystem Resilience and Habitats**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Candidate sites identified in the Preferred Strategy will require appropriate levels of species and habitat surveys. Advise that this master planning should aim to provide sufficiently sized and resilient networks. Severance of habitats should be minimised and important that any new habitat created should be well linked to existing habitats.</p>	<p>The comments are noted. The Masterplans for the key sites have been informed by the findings of the Preliminary Ecological Assessments, and will be refined following further survey work. The importance of avoiding the severance of habitats is acknowledged. In accordance with national planning policy, each site will need to demonstrate a net benefit for biodiversity.</p>	<p>Consider the NRW comments as part of the Masterplanning work.</p>
<p>The loss of green space has a direct impact on wildlife which is already under considerable pressure from human activity.</p> <p>A variety of habitats could be lost.</p>	<p>Preliminary Ecological Assessments have been undertaken on the key sites, the findings of which will be reflected in the Masterplans for each key site. In accordance with national planning policy, each site will need to demonstrate a net benefit for biodiversity.</p>	<p>N/A</p>

### **Traffic and Transport**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Vision of around 16000 additional residents setting out to work in a planned utopia,</p>	<p>It is acknowledged that new development may generate an element of additional traffic. However, there is a requirement that the RLDP makes provision for housing and the implications of additional traffic must be</p>	<p>The Council will publish a Stage 2 Strategic Transport</p>

<p>hopping on and off efficient and affordable trains and buses is unrealistic. If excellent transport links can be achieved, then new housing could be introduced. Until then, building 8000 plus homes is ridiculous.</p> <p>Proposed developments are not focused in areas that are sufficiently supported or served by existing rail stations. No plans to improve roads to facilitate additional houses.</p> <p>Too many homes with no added improvements to roads to facilitate.</p> <p>Introduction of 5 sites will increase traffic and road congestion.</p> <p>5 sites proposed will increase road traffic extensively, bringing most onto A4055/bypass into Barry/Cardiff. Employment is already high in these areas and with employment sites at Bro Tathan/Aberthaw road, traffic can only increase both domestic and commercial.</p>	<p>balanced against this. As shown in the Stage 1 Strategic Transport Assessment, which largely uses pre-pandemic data there are junction capacity issues in several locations within the Vale of Glamorgan. This isn't an issue localised to the areas where new allocations are being proposed, and the introduction of new housing in any location within the Vale would likely exacerbate current issues.</p> <p>A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan. This will include updated data, which will take into account post-pandemic travel patterns. This will also identify any mitigation that may be required to reduce the impact of the additional traffic from the sites.</p> <p>To mitigate against this the harm of additional traffic, sites have been selected to reflect the chosen spatial option for the Preferred Strategy, which sought to site new development in the most sustainable transit-oriented locations. This strategy seeks to reduce the need to travel and where journeys need to be made site new development in proximity to sustainable transport nodes, prioritising the provision of active travel links. The Council will also consider car parking provision at the sites and whether lower requirements would be acceptable in order to promote modal shift.</p> <p>Agreed improvements to the highway network, including the provision of active travel routes, will be phased as the developments comes forward. This will be controlled by a legal agreement. Proposed active travel improvements would have the potential to improve travel time. All travel time data has been provided by Transport for Wales.</p> <p>It is appreciated that trains travelling along the Vale of Glamorgan Line are currently well used during peak times. TFW have committed to introducing additional services at peak times and they will also be introducing new trains to the Line with increased capacity.</p>	<p>Assessment alongside the Deposit Plan.</p>
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<p>Transport is patchy in the rural Vale and road vehicles are used primarily.</p> <p>Contributes to the already unacceptable level of pressure on transport links.</p> <p>Sites in Rhose and St Athan will increase road traffic to the A4055 Rhose bypass.</p> <p>There will be pollution issues.</p>	<p>Prior to the determination of any planning application on the key sites, Air Quality Assessments would have to be carried out that would investigate the implications of air pollution on the site and resulting from an increase in car journeys from the site. Appropriate mitigation can be put in place at that time to address any potential issues.</p>	
<p>Support safe cycle and pedestrian links between proposed sites and existing rail stations being provided.</p>	<p>The Council are progressing a number of schemes identified on the Active Travel Network Map, and there will be a requirement for improvements to be made to active travel links from Key Sites to stations as part of the requirements for the sites.</p>	<p>N/A</p>

**Conformity with National, Regional and Local Policy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>If the Environment (Wales) Act is to be considered, and you want connect people with nature then you need to leave some nature and not build houses on it.</p>	<p>It is apparent that the number of brownfield sites that are ready for housing development within the RLDP plan period is limited. No appropriate candidate sites were promoted on brownfield land during the call for candidate sites that would be considered Key Sites in the RLDP. There are several smaller scale sites that may be allocated for housing, however, these alone would only meet a small portion of the overall housing target. Instead, in order to meet the housing requirement development on greenfield land is required. A biodiversity net-benefit will be delivered through the development and therefore harm to the natural environment will be avoided.</p>	<p>N/A</p>

	<p>Whilst it is acknowledged that the development will result in the loss of greenfield as justified elsewhere potential harm has to be balanced against allocating sites to meet the housing requirement.</p> <p>National planning policy and proposed policy within the RLDP on green infrastructure is strong. Any future development at the site would have to comply with this and resultantly it is considered that suitable schemes can come forward on key sites that protect key green infrastructure features and provide a biodiversity net benefit can be achieved.</p> <p>Broadly, all site allocations will set out what green infrastructure at the site will be protected and where biodiversity net-benefits will be achieved. More detail on this will be determined during planning applications for each of the sites. Nevertheless, at this stage principles for protection and net-benefits can be established through site master planning which will be published alongside the Deposit Plan.</p>	
In respect of the Well-being of Future Generations Act, how can these large developments be globally responsible? The only prosperity is for the developer.	Developers will be required to deliver Section 106 obligations to mitigate against the impact of development. This includes the delivery of affordable housing. Large developments offer a greater opportunity to deliver a range of community benefits through the development of a mix of uses.	N/A

### **Conformity with Vision, Aims and Objectives**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The vision will be completely lost.	The Council strongly believe that the sites identified align with the Preferred Strategy. Regarding the Vision, an integral part is housing growth that delivers homes for all and the purpose of this is to meet the high housing demand. Fundamentally, without the delivery of housing the intention of the Vision cannot be achieved. Ultimately, that delivery does lead to the need for issues to be balanced in some cases. However,	N/A



	through aligning with the drafted strategic policies within the Preferred Strategy and national planning policy, particularly on placemaking, it will be ensured that the site conforms with the Vision in its entirety.	
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### **Stages/Timing of Development**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Have the VOG exhausted all the Key Sites outlined in the previous LDP and if not, why not? Will these sites need developing first?	BP9 Housing Land Supply sets out the position on the rolled forward sites. Whilst in principle the adopted LDP sites can come forward at an earlier stage than any new key sites, there is no requirement that they are developed first.	N/A
Inadequate information about the phasing of developments. Strategy should set out more site-specific details giving the general phasing timescales of employment and land allocations, key infrastructure time targets in advance of planning permission being granted.	Further information on phasing will be included in the Deposit RLDP, informed by the Housing Stakeholder Group.	Provide further information on phasing in the Deposit RLDP.

### **Effect on Character of Village and Other Settlements**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
RLDP will change the character of the area.  New plans will destroy the very nature and specialness of the Vale of Glamorgan by turning	The character of the countryside will inevitably change in each location as it will become urbanised. However, each of the five Key Sites are not in isolated rural locations – they are extensions to existing settlements. Given the limited availability of brownfield land the loss of countryside character would be an inevitability in meeting the housing requirement on any greenfield site chosen.	N/A

<p>places into more urbanised areas. All of South Vale is being industrialised and urbanised in this strategy.</p> <p>The integrity, sustainability and rural appeal of the area is already adversely affected by the considerable increase of building projects over recent years.</p>	<p>Development proposals are required to demonstrate Placemaking Principles which will add social, economic, environmental, and cultural value, resulting in enhanced local benefits. For example, a diverse mix of uses, green infrastructure, active travel and more (full list under SP5 in the Preferred Strategy). A Placemaking Statement will be required for each Key Site development to set out how the proposal accords with each Placemaking Principle.</p>	
<p>VOGC have allowed extensive developments in all areas in last 20 yrs.</p>	<p>It is a requirement for local authorities to prepare development plans, which includes allocating land for housing. The level of growth in the adopted LDP, and the Unitary Development Plan before it, was considered appropriate through an Examination process by an Independent Inspector.</p>	<p>N/A</p>

### **Infrastructure**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Any increase in housing provision across the Plan period will put increased pressure on healthcare services. UHB is committed to working with the Council to consider the impact of each key site in relation to service capacity and ensuring that the necessary infrastructure can be provided as required.</p>	<p>The commitment from the UHB to work with the Council to consider the impact of development on service capacity is welcomed.</p>	<p>The Council will continue to liaise with CAVUHB.</p>

<p>Facilities and services are stated as the reason for choosing development areas, but these are not taken account of in reality. No growth in facilities with the number of homes being planned for the Vale.</p> <p>Hospitals and doctors will be overrun.</p>	<p>There are a number of local facilities and amenities available within the Vale of Glamorgan area.</p> <p>S106 contributions can be sought from developers towards the costs of providing community and social infrastructure, the need for which has arisen as a result of a new development taking place. S106 monies may only be spent on facilities where the new development has, at least in part, contributed to the need for the facilities. In this regard contributions must be spent on improvements to infrastructure where this is directly related to the proposed development, it cannot be spent elsewhere or on items that are not a direct result of the development.</p> <p>Future infrastructure requirements will be integrated within the development sites and where appropriate the provision will be phased in step with the development to ensure the timely provision to meet rising demand such as additional educational provision.</p> <p>The Council shall consider the range of services and facilities to be provided as part of the housing proposals with the aim to facilitate improved accessibility to services and facilities. To this end the Council shall be arranging community engagement sessions in respect of Key housing sites proposed within the RLDP. This will provide communities the opportunity to engage with site promoters to identify community aspirations.</p> <p>The Council will also explore potential for multi-use community buildings such as access to facilities that existing within local schools for the benefit of residents.</p> <p>Proposals for additional retail and commercial uses will be considered within the context of the retail evidence undertaken by the Council alongside national policy</p> <p>The Council are liaising with Cardiff and the Vale University Health Board to understand the implications of the Replacement LDP. This includes a</p>	<p>N/A</p>
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	consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, CAVUHB will be able to plan for future service requirements and plan accordingly.	
Insufficient capacity at schools	The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly.	The Planning Department will continue to liaise with the Sustainable Communities for Learning Team.  The Deposit Plan will be supported by a background paper which considered the impact of new development on school capacity and how this can be addressed.
Will the VOG commission all relevant traffic, wildlife, gas mains, sewage networks before the next stage of this process?	The promoters of the key sites are required to provide the key evidence to demonstrate that their sites are acceptable. Candidate site promotions have been supported by evidence to justify that the sites are acceptable in principle, with more detailed information on matters such as traffic required as part of the Deposit RLDP stage. The Council have consulted with statutory undertakers in respect of their requirements.	N/A

### **Employment**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Fail to recognise the excess of housing over available jobs.  No growth in employment.	As set out in BP7 Housing and Employment Growth Options, the level of housing growth has been aligned with employment growth. The level of employment growth is informed by the Employment Land Study (BP12).	N/A

**Health and Well-being**

Issue raised	Council response	Action
<p>Proposed developments will negatively impact the health and wellbeing of local residents by taking away valuable rural areas that support nature and the natural environment.</p> <p>Quality of life for new residents in these developments is not taken into account.</p> <p>Unrealistic, unhealthy, stress and anxiety-inducing so called planning.</p>	<p>The Council will ensure that all new development shall meet the RLDP wellbeing objective which is supported through the plan with policies that will require wellbeing to fully considered as part of any development proposals. These will include incorporation of green infrastructure, open spaces, active travel and when identified enhanced access to local health facilities. Developments will significantly open up the site to public access allowing access for all through public areas, massively improving the physical health benefits of each site. Through designing high quality areas of public open space, the opportunity also exists to create restorative places that will provide benefits to mental wellbeing as well.</p> <p>Additionally, the Council will be producing Supplementary Planning Guidance on health and wellbeing alongside the Deposit Plan which will provide further detail on measures which the Council will require new developments to incorporate.</p>	

**Location**

Issue raised	Council response	Action
<p>Planning department has not looked at the local communities when it comes to the RLDP and the 5 key sites and how they are located.</p>	<p>Following the candidate site assessment process undertaken to inform the Preferred Strategy, the sites identified as Key Sites are those that are considered to best accord with the principles of the Preferred Strategy due to their locations in close proximity to sustainable transport links, services and facilities and are sites that are considered to be viable and deliverable, having regard for constraints.</p>	

### **Size of Development**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Sites in East Barry and primary settlements in the Eastern Vale are not appropriate for large scale housing.	Barry and the Eastern Vale is the best connected from a public transport perspective and has the greatest services and facilities. It is therefore considered that this area can accommodate an increase in housing in a sustainable way.	N/A
St Athan sites are completely out of proportion to the current size of the village compared to the impact the other proposed sites will have to their locations.	It is acknowledged that St Athan has two key sites identified and this will accommodate up to 1,150 new dwellings. These sites will, however, deliver a mix of uses and will help support the business case for the development of a new station.	N/A

### **S106 Contributions**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
No guarantee that any of the S106 funding will benefit these areas.	<p>In the 5 financial years up to April 2023 (not including 2023-2024) following the adoption of the Adopted Local Development (2011-2026) the Council received £30,198,719 in Section 106 contributions. In 2022/2023 £6,204,869 was spent on schemes. Therefore, the Council has received and spent significant amounts of S106 contributions since the plan was adopted.</p> <p>In order to evidence that sites are deliverable it will have to be evidenced that they are viable and this would have to consider S106 contributions. If it transpires that sites are no longer viable following approval the Council have the opportunity to dispute this and if required refuse planning</p>	N/A

	<p>permission. If developers fail to meet their planning obligations in pre-agreed timelines the Council retain the ability to take legal action.</p> <p>S106 monies may only be spent on facilities where the new development has, at least in part, contributed to the need for the facilities. In this regard contributions must be spent on improvements to infrastructure where this is directly related to the proposed development, it cannot be spent elsewhere or on items that are not a direct result of the development.</p>	
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### **Flooding and Drainage**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Concern about flood risk associated with the key sites.</p> <p>Do not see any practical proposals for mitigating the flood risks which already affect these sites and would be further exacerbated by housing developments.</p>	<p>It is acknowledged that significant concern was raised in relation to the implications of flooding. The Council shall require the developer of the site to undertake a high-level Flood Risk and Drainage Assessment to identify potential flood risks associated with the site. The Council's Drainage Team and Natural Resources Wales will have to be satisfied that the drainage and flooding measures proposed on site are sufficient to deal with the associated risk prior to any development taking place.</p> <p>Since 2019 Sustainable Drainage Systems (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 detriment offsite.</p>	<p>N/A</p>

## Strategic Policies

Responses to Policies SP1, SP3 and SP3 are included in the Preferred Strategy section.

Responses to Policy SP4 are included in the Key Sites section.

### General Comments on Strategic Policies

Issue raised	Council response	Action
Support for the Strategic Policies	Support is welcomed.	N/A
The Policies are good but need to be acted upon.	The comment is noted.	N/A
Objection to the strategic policies	The objection is noted.	N/A
No policies have been included on the mitigation of flood risk	Flood risk is covered under Policy SP15, and further detail will be provided in the Deposit Plan	Include further detail on flood risk in the Deposit RLDP.
<p>The strategic policies only make sense if there are realistic plans to deliver them.</p> <p>Transport is a very large problem, especially given the climate change imperative. More effort should be made to address this otherwise the plan will be unrealistic.</p> <p>These efforts should be realistic ideas about achieving better value for money and better engagement with the public.</p>	The comments are noted. The Preferred Strategy focuses development in locations that are well served by sustainable transport.	N/A



## SP5 Placemaking

Issue raised	Council response	Action
Recognition of the commitment to protection and enhancing the historic environment.	Support is welcomed.	N/A
St Athan is excluded from placemaking, despite large new developments being proposed, as it is not a town.	<p>Vale of Glamorgan Council became a signatory of the Placemaking Wales Charter and is now eligible to apply for Welsh Government funding to prepare Placemaking Plans for each town of the Vale: Barry, Penarth, Cowbridge and Llantwit Major.</p> <p>Whilst St Athan is not eligible for a funded placemaking plan, the placemaking principles guide all developments which will add social, economic, environmental and cultural value.</p> <p>It is intended that placemaking workshops be held with St Athan and other communities with key sites within them to help ensure that placemaking principles are embedded in the design and layout. The input of the local community is important in this.</p>	Site-specific placemaking workshops to be carried out in areas with key sites.
Policy is utopian in nature.	The policy embraces the requirements of the Placemaking charter and reflects key things that need to be considered in new developments. All elements are considered to be realistic.	N/A
Further guidance needed on how place is defined.	Further guidance on placemaking and the definitions linked to it are contained in the DCFW Placemaking Guide, which is referenced in the supporting text of the policy.	N/A
High density development in rural areas not appropriate	It is recognised that the density of development must respect the local context and therefore Policy SP5 states that developing high densities are 'where appropriate.' Future Wales is clear that higher densities should be focused around public transport stations and stops.	N/A

<p>Placemaking approach between new developments and existing settlements and community should be strengthened.</p>	<p>Noted. This is key point that could be more explicitly explained in supporting text of the policy.</p>	<p>Include reference to the need to strengthen the links between new developments and existing communities.</p>
<p>Flood risk should be noted in the policy. Suggested wording: 'an important factor in creating sustainable and safe places, which enhances the well-being of residents, is to ensure that they are not subjected repercussions of flood risk and/or erosion.'</p>	<p>Comment noted. Consider inclusion of reference to flooding in respect of placemaking.</p>	<p>Include reference to flooding within the policy.</p>
<p>Compliance with criterion C "creating a diverse mix of uses and multi-functional spaces" is not always possible and would very much depend on the size of the site. Therefore, the wording should be amended to consider the nature and scale of the site and the development proposed.</p> <p>SPG should be prepared to provide clarity to developers on Placemaking Statements.</p>	<p>Policy SP5 is a strategic policy which sets out the key principles of placemaking. At Deposit stage, a series of development management policies will be included which will consider the practicalities of achieving this. The point on the difficulty of achieving a mix of uses on smaller sites, is however noted.</p> <p>The Council agrees in principle with this suggestion and will look in future at the possibility of preparing SPG.</p>	<p>At Deposit stage consider further guidance on the scale of sites that would require a mix of uses.</p> <p>Consider the preparation of SPG on Placemaking Statements.</p>

<p>Policy references connected communities and sustainable services, but these don't exist.</p> <p>Criterion D should reference public transport as well as active travel.</p>	<p>Concern around connected communities is noted. Policy SP5 seeks to ensure future developments improve this.</p> <p>In alignment with the Llwybr Newydd (Welsh Transport Strategy) the wording should be amended to include public transport in the SP5 Placemaking policy.</p>	<p>SP5: Placemaking priority D incorporate public transport into the wording.</p>
<p>Amendment/Correction to wording of paragraph 6.74 - reference says SP12 for Health and Wellbeing, should be SP6?</p>	<p>Erroneous reference noted. This will be amended.</p>	<p>N/A</p>
<p>Developments must meet the required standards set by WG regarding adequate space.</p>	<p>Grant funded affordable housing is required to meet space standards, but this is not a requirement for market homes in the same way.</p>	<p>N/A</p>

## SP6 Creating Healthy and Inclusive Spaces and Places

### Support

Issue raised	Council response	Action
Agree with the policy but it should consider that new developments provide healthy and inclusive places that all members of our communities can access.	The provision of inclusive places is integral to placemaking and between Policy SP6 and SP5 Placemaking it is considered that the Plan is strong on this issue.	N/A
Fully support the statements in paragraph 6.92, 6.93, 6.95 and 6.96.	Support is welcomed.	N/A

### Object

How can places be healthy and inclusive when sites are proposed on farmland?  This is taking away healthy and inclusive places.	It is not considered that developing on greenfield land would negatively impact on whether places are healthy and inclusive. Development in these locations would make them wholly more accessible to members of the public and provide the opportunity to create high quality public open spaces that otherwise would not exist. This is particularly the case where existing farmland is not served by public rights of way, so provides little demonstrable benefit to the health and wellbeing of the general public. This is without stating the value of providing sufficient numbers of homes to meet demand.	N/A
How does continued development on farmland make Wales and the UK self-supportive in terms of food security?	77.8% of the Vale of Glamorgan is agricultural land, amounting to 26459 hectares. The 5 key sites proposed within the Preferred Strategy amount to approximately 161 hectares, albeit not all of this would be built on. This amounts to a loss of 0.6% of the agricultural land within the Authority area, which is negligible in its impact on the total. Furthermore, in line with national planning policy, development is being directed away from the best and most versatile agricultural land.	N/A

<p>What does enabling access to healthy food choices have to do with local government?</p>	<p>The Local Development Plan will influence all development within the Vale of Glamorgan that requires planning permission. In some instances, the outcomes from development proposals will have the opportunity to enable access to healthy food options.</p>	<p>N/A</p>
<p>When it is difficult for healthcare services to meet current demands, how is it intended to deal with the additional pressures from more residents?</p>	<p>Full details of the infrastructure requirements of the RLDP will be provided at the Deposit Plan Stage. The assessment of the additional infrastructure to support the identified housing growth is currently being prepared and this includes health facilities.</p> <p>Notwithstanding this, the RLDP Preferred Strategy sets out the headline infrastructure requirements on key sites, which will be refined and expanded upon in the Deposit Plan.</p>	<p>N/A</p>
<p>The targets in these policies won't be met.</p>	<p>The purpose of the policy is to ensure that new development achieves these standards. New development would have to comply with the requirements of the policy in order to be found acceptable. The policy doesn't set targets but seeks to influence new development.</p>	<p>N/A</p>
<p>How will new healthcare facilities be provided? Prior to development taking place or once residents are in situ and demand has increased elsewhere?</p>	<p>The facilities being provided, and their phasing was not determined in the Preferred Strategy, however, more detail will be provided in the Deposit Plan.</p> <p>Delivery of facilities and the phasing of this can be influenced by many factors. If it is a standalone facility, it may be delivered in line with the scope of a project when it is required. If a facility is being provided alongside a housing development, for example, it is likely that it would have to be built when new development has higher occupancy rates in order to ensure that there are sufficient numbers of potential users in residence on site.</p>	<p>N/A</p>
<p>The importance of referencing green infrastructure in mental and physical wellbeing should be referenced.</p>	<p>The importance of open space and green infrastructure is highlighted in paragraph 6.84 of Policy SP6, in listing the attributes of healthy places and spaces. Furthermore, Criterion G of Policy SP18 Green Infrastructure identifies that in order to provide high quality green infrastructure and maximise its functionality development proposals must '<i>facilitate environments that promote mental and physical health and wellbeing</i>'. It is considered that the inclusion of this criterion in Policy SP18 makes it explicit</p>	<p>N/A</p>

	that the provision of green infrastructure is considered integral to providing healthy and inclusive spaces and places, and to avoid repetition within the Plan it is not considered necessary to introduce this explicitly into SP6.	
Implement policy on soundscapes and quiet areas.	It is understood that national planning policy in the form of a Technical Advice Note is being prepared on soundscapes and noise pollution. However, in the absence of this there is limited national policy which can be used to create local planning policy. Currently, noise assessments are required where a potential for harm is identified.	N/A
As HIAs are not statutory requirements in Wales the requirement for them on all major development would be unreasonable, and for many major developments unnecessary.	There is substantial evidence identifying the benefits of conducting Health Impact Assessments on development proposals. Resultantly, the Council will likely consider it expedient to require them on larger developments.	N/A
Amend policy wording to 'all development should seek to create healthy and inclusive places which enable social cohesion and reduce health inequalities'	The suggestion is noted. The current policy wording is considered clear in its intent, however, it is considered that 'improve' should be replaced by 'reduce', when referencing health inequalities. A new verb will have to be introduced when referencing social cohesion and the use of improve is considered appropriate.	Change SP6 wording to state: All development shall seek to create healthy and inclusive places that reduce health inequities and improve social cohesion.
Paragraph 6.84 suggest wording change to '....high quality, appropriate and adaptable to needs housing accommodation'	The suggestion is noted. It is considered that ensuring housing is adaptable to needs is facilitated by Policy SP8 Affordable and Specialist Housing. Therefore, it is not considered necessary to repeat this.	N/A
6.92 point of clarity - Cardiff and Vale University Health Board not 'Local Health Board'	Noted, this will be amended as appropriate.	Amend paragraph 6.92 to correctly refer to the Cardiff and Vale

		University Health Board
6.94 – suggested that this doesn't just seek to ensure no negative impacts of new development and that positive steps should be taken to adapt to climate change.	It is considered that this paragraph is required to enable standard environmental protection policies to follow on. The wider Policy, as well as Policy SP15 Climate Change and SP18 Green Infrastructure set out the importance of positively adapting to the implications of climate change.	N/A

## SP7 Sustainable Transport

Issue raised	Council response	Action
<p>Cycle routes insufficient.</p> <p>Limited capacity and poor frequency of trains and buses.</p> <p>Train journeys are too expensive.</p> <p>Inadequate funding for road maintenance.</p> <p>Limit parking in developments.</p>	<p>One of the key objectives of the policy for SP7 is to reduce the need for travel and subsequently reduce car dependency by providing alternative travel options.</p> <p>The Council has prepared an Active Travel Network Map which identifies future routes for walking and cycling. A number of schemes are being actively progressed through Section 106 and other funding sources.</p> <p>The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with Transport for Wales (TfW) in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme.</p> <p>It is acknowledged that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of bus services. New development in an area will increase the population base of potential bus users, which can help support route sustainability.</p> <p>TFW have committed to introducing additional rail services at peak times and they will also be introducing new trains to the line with increased capacity. The Council will continue to engage with TfW to enhance services on the VoG Line.</p> <p>The cost of train journeys and the maintenance of the roads both fall outside of the scope of the RLDP.</p> <p>The Council has maximum standards for car parking set out in the Parking Standards SPG and each development will be individually assessed to determine the amount of car parking that is needed.</p>	<p>N/A</p>



<p>Need to be clear that Barry Docks interchange was not funded by the Council.</p> <p>Cardiff bound platform unsafe gap between platforms and the train.</p>	<p>The Barry Dock interchange was funded by Cardiff Capital Region and the station is managed by Transport for Wales. As such accessibility of platforms falls outside the remit of the plan.</p>	<p>N/A</p>
<p>Public transport must be in place before any development commences.</p>	<p>Developers are required to provide contributions towards sustainable transport and/or appropriate on or off-site provision under section 106 agreements. The phasing of contributions will be set out within the s106 agreement but will normally be linked to a proportion of houses being completed, rather than an upfront contribution (depending on viability considerations).</p>	<p>N/A</p>
<p>The policy doesn't recognise or propose improvements for sustainable transport within the rural Vale.</p>	<p>The Council are working with bus operators in respect of services in the rural Vale. It is intended that small-scale affordable housing led developments will be allocated in appropriate minor rural settlements. Where these are brought forward by the private sector, there will a requirement for a sustainable transport contribution in the Section 106 agreement (subject to the size of the development).</p>	<p>N/A</p>
<p>Plan included aspirations for transport links and no proposals.</p>	<p>Further details on proposals to improve sustainable transport links will be included in the Deposit RLDP.</p>	<p>Include sustainable transport proposals in the Deposit RLDP.</p>
<p>Limited sustainable travel options at St Athan</p>	<p>A recent announcement has been made that the UK Government will fund a business case to look at options for a new station at St Athan.</p>	<p>Continue to work with DfT and TFW towards delivery of the station.</p>
<p>Improve the accessibility of the transport system for those with mobility issues.</p>	<p>Criterion v of the policy is to improve accessibility and connectivity to sustainable transport facilities. Whilst accessibility would include access for those with mobility issues, for clarity the wording should be amended to read 'accessibility for all.'</p>	<p>Amend criterion v to reference 'accessibility for all'</p>

Need for an active travel route between Llantwit Major and the Vale Business Park	The Active Travel Network Map identifies a future cycle link between Llantwit Major and Cowbridge, which would also link to Vale Business Park.	N/A
Walking and cycling should not be given top priority as people need to travel for work.	The RLDP reflects the sustainable transport hierarchy set out in Llwybr Newydd. If walking and cycling were not prioritised, this would be contrary to national planning and transport policy.	N/A
Electric bike network should be a priority for the Vale.  Travel plans should not just be for the new developments and be produced for the existing settlements as well.	The comments are noted. The development of active travel routes will support those with electric bikes.  Whilst outside the remit of the RLDP, the Council are producing Placemaking Plans for the four main towns in the Vale. Travel will be a key theme within these.	N/A
Lighting for active travel routes should be avoided in area of biodiversity significance	This falls outside the remit of the RDLP there will be more detail on specific intervention in the deposit plan. With any transport scheme ecological and environment surveys will be undertaken to assess the impact and consideration will be given to appropriate mitigation.	N/A
Support for the policy.	Support welcomed.	N/A
Rewording of SP7 alternatives to car use to be referred to mobility hubs and shared car use developments to strengthen the policy to counter car dependency in the Vale.	These amendments would strengthen the policy and should be considered for rewording the policy.	Considerations for rewording section iii in SP7.
Objection to paragraph 6.102 minimum standard parking promotes car use	Paragraph 6.102 incorrectly refers to 'minimum parking standards.' This should be amended to read 'maximum parking standards.'	Amend paragraph 6.102 to refer to maximum standards,

		rather than minimum standards.
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## SP8: Affordable and Specialist Housing

Issue raised	Council response	Action
<p>Consultation documents refer to affordable housing. No reference to 'Secured by Design'. A Secured by Design Gold Award is a requirement by Welsh Government for grant funded social housing projects under their Development Quality Requirements (DQR).</p>	<p>Noted. Policy SP8 is a strategic policy setting out the high-level target for a minimum number of affordable homes to be delivered on the plan period and therefore a reference to secured by design in this policy would not be appropriate. Policy SP5 on Placemaking references a 'safe' public realm. At Deposit stage, criteria-based development management policies on matters including design will be included in the plan and consideration will be given as part of the drafting of these policies to the need to reference 'secured by design.'</p>	<p>Consider referencing Secured by Design in development management policies</p>
<p>Affordable housing must be offered to local people first rather than wider Vale and neighbouring counties.</p>	<p>New affordable housing will be allocated to people registered on the Council's housing waiting list in accordance with the agreed housing allocation policy.</p>	<p>N/A</p>
<p>Sound principles. Public lack confidence that the local will enforce the requirements of developers.</p>	<p>Support is welcomed. Under Policy SP12: Community Infrastructure and Planning Obligations, paragraph 6.130 highlights that section 106 requirements are voluntary and require the cooperation of the developer to be delivered. However, where a developer fails to show they can adequately mitigate the impacts of their development, either through planning obligations (including affordable and specialist housing) or other measures, it is likely that the application will be refused.</p>	<p>N/A</p>
<p>Inadequate delivery of affordable housing.</p> <p>Preferred Strategy proposes to increase affordable housing but allows developers to do what they want and produce more large houses. Overall affordable housing percentages substantially below the Council's own supplementary planning guidance.</p>	<p>Noted. The Annual Monitoring Report 2022-23, available on the Council's website, identifies that a total number of 1,968 affordable dwellings have been delivered since 2011, which is slightly below the LDP target of 2,279 by 2023. Notwithstanding this, developer interest remains strong within the authority, with a number of housing developments currently under construction and sites granted permission yet to commence.</p> <p>Planning permissions for new housing developments will be require affordable housing to be delivered through a section 106 agreement. Where a developer fails to show they can adequately mitigate the impacts of their development, either through planning obligations (including affordable and</p>	<p>N/A</p>

<p>Council proposes an additional 1,205 affordable dwellings per annum in the Vale which is more than the total affordable dwelling completed in Wales in 2022.</p>	<p>specialist housing) or other measures, it is likely that the application will be refused.</p> <p>Policy SP4 of the adopted LDP sets out targets of between 30% and 40% affordable housing and these targets have been achieved on a number of sites across the Vale. However, it is recognised that there are exceptional circumstances that mean that it is not viable to deliver these affordable targets. Paragraph 6.30 states that where concerns over viability are raised, the onus will be on the developer to demonstrate through the submission of a viability appraisal that the required contribution would make the development unviable. Where it is demonstrated that there are circumstances that impact upon the delivery of affordable housing, the Council may negotiate the level, type and tenure of provision. This accords with national planning policy (paragraph 4.2.22 of PPW). The Deposit RLDP will contain similar policy text. Further guidance will continue to be provided in the Affordable Housing SPG.</p> <p>The figure of 1,205 units per annum is the need for new affordable homes identified in the 2022 LHMA, rather than the target . It is recognised that this is significantly higher than overall housebuilding rates due to a significant backlog of existing need. The planning system alone cannot address this, but it is important that the RLDP maximises affordable housing where possible. SP8 identifies that a minimum of 2,000 affordable residential units will be delivered over the 15-year plan period to contribute to the established community housing needs of the Vale of Glamorgan. The overall affordable housing target will depend on the viability of area specific targets and the spatial distribution of new and windfall sites and will therefore be revised for the Deposit LDP to take account of additional housing sites to be identified and to reflect updated viability evidence.</p>	
<p>A direct reference to community led housing in the Preferred Strategy document will address and remove some of the potential barriers and</p>	<p>Noted. A reference to community-led housing would accord with paragraph 4.2.27 of PPW (Edition 12) which states that affordable housing may include that owned by community-led housing organisations where this meets Welsh Government’s definition of affordable housing.</p>	<p>Include reference to Community-led schemes in the</p>

challenges faced in the delivery of such forms of housing.		supporting text for Policy SP8
Concern that more affordable housing is being built in St Athan and will be occupied by people from outside the area.	The Local Housing Market Assessment and information from the Council's waiting list indicate that there is a need for affordable housing in St Athan. New affordable housing will be allocated to people registered on the Council's housing waiting list in accordance with the agreed housing allocation policy.	N/A
<p>The Vale has recently set a precedent for how developers can reduce or even remove their S106 obligations.</p> <p>It is inevitable that the locations chosen will only attract higher end development and housing and is unlikely that the affordable housing numbers/requirements will be met.</p>	<p>Policy SP4 of the adopted LDP sets out targets of between 30% and 40% affordable housing and these targets have been achieved on a number of sites across the Vale. However, it is recognised that there may be exceptional circumstances that mean that it is not viable to deliver these affordable targets. Paragraph 6.30 states that where concerns over viability are raised, the onus will be on the developer to demonstrate through the submission of a viability appraisal that the required contribution would make the development unviable. Where it is demonstrated that there are circumstances that impact upon the delivery of affordable housing, the Council may negotiate the level, type and tenure of provision. This accords with national planning policy (paragraph 4.2.22 of PPW). The Deposit RLDP will contain similar policy text. Further guidance will continue to be provided in the Affordable Housing SPG.</p> <p>Allocations in all parts of the Vale will be required to deliver an element of affordable housing as part of Section 106 agreements. The plan also proposes affordable housing led schemes in minor rural settlements.</p>	N/A
Unable to comment on the number of affordable houses required during the plan period but support a policy that ensures such needs will be met in a way that ensures integration into the existing communities.	Support is welcomed.	N/A
Seeks to deliver a minimum of 2,000 affordable homes over the plan period.	Noted. To help address the need identified, the Council anticipates that the current land supply identified in SP3 together with new allocations will	N/A

<p>This is not enough and is well below the need for affordable homes identified by the Council in the draft Local Housing Market Assessment (LHMA).</p> <p>Proposed Key Sites are forecast to deliver 1,109 affordable housing units which is well short of the 2,000 minimum set out in the policy. Assume the Council is relying on existing housing site commitments to deliver the remainder.</p> <p>Some of the proposed Key Sites will inevitably take a relatively long time to move through the planning process and begin delivery housing and affordable housing. Essential that the plan includes more immediately available and smaller affordable housing site opportunities.</p> <p>There is a need to plan for the delivery of these affordable homes in a geographical and community focused manner. New affordable housing is required in rural communities as the plan, as drafted, will fail to bring forward the affordable homes that these communities need.</p> <p>Support for growth in economic development, diversification and tourism and leisure uses in the rural vale will cause the issues of a lack of</p>	<p>deliver a minimum of 2,000 affordable dwellings through the planning system over the 15-year plan period. It is intended that the final new methodology LHMA will be included as part of the evidence base for the Deposit Plan once signed off by Welsh Government. The overall affordable housing target will therefore be revised for the Deposit LDP to take account of this as well as additional housing sites to be identified and to reflect updated viability evidence. This figure reflects what the planning system can achieve. However, higher levels of affordable housing can be delivered through the Council and RSL's own housebuilding programme.</p> <p>Paragraph 6.107 states that the Council anticipates that the current land supply identified in SP3 together with new allocations will deliver a minimum of 2,000 affordable dwellings over the plan period. Therefore, the affordable housing forecast takes account of the windfall allocations, units under construction, units with planning permission (not started), LDP sites carried forward, additional housing and affordable housing led allocations in addition to the Key Housing Sites identified.</p> <p>Planning Policy Wales has provided greater emphasis on increasing the supply of affordable housing through identifying affordable housing-led schemes within LDP's. The Council considered numerous affordable housing-led schemes under the Stage 2 Candidate Site Assessment and the conclusions were published in the Stage 2 Candidate Site Register as part of the Preferred Strategy Consultation. A 2<sup>nd</sup> Call for Sites was conducted as part of the consultation in which the Council has encouraged the submission of affordable housing-led schemes which are currently being assessed on their suitability to help meet and deliver affordable housing requirements. These affordable housing led sites will be brought forward in minor rural settlements. It is also anticipated that Policy MD10 of the adopted LDP on Affordable Housing Exceptions sites will be rolled forward into the Deposit RLDP, which will make further provision in appropriate rural areas.</p>	
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<p>housing and affordability to worsen unless accompanied by appropriate provision for affordable housing growth.</p>		
<p>RLDP needs policies that implement Age-Friendly Community. The lack of mention of age-friendly shows no consideration to the “age-friendly” designation.</p>	<p>The supporting text for SP8: Affordable and Specialist Housing references the Older Persons Housing Strategy and the need for age designated housing. However, given the Vale’s recent designation as an age friendly community, there is merit in also referring to this.</p>	<p>Include reference to the Vale’s ‘Age Friendly’ status in the supporting text for Policy SP8.</p>
<p>Crucial that arrangements are put in place to deliver the maximum number of affordable housing units possible given the front loading envisaged and the extent of the backlog noted in the LHMA.</p>	<p>To help address the need identified, the Council anticipates that the current land supply identified in SP3 together with new allocations will deliver a minimum of 2,000 affordable dwellings through the planning system over the plan period. The overall affordable housing target will depend on the viability of area specific targets and the spatial distribution of new and windfall sites and will therefore be revised for the Deposit LDP to take account of additional housing sites to be identified and to reflect updated viability evidence. The Council are currently considering further affordable housing led schemes submitted as part of the 2<sup>nd</sup> Call for Candidate Sites.</p>	<p>N/A</p>



<p>Current proposed social housing proportion of the proposed developments risks the viability and deliverability of many of the sites, leaving the essential need for social housing lacking.</p> <p>Highest demand for social housing is in Barry and Penarth, yet the disproportionate housing allocation in other areas will create social housing in communities where it is not needed.</p> <p>High target undermines the quality of developments and size of properties.</p>	<p>Policy SP4 of the adopted LDP sets out targets of between 30% and 40% affordable housing and these targets have been achieved on a number of sites across the Vale. However, it is recognised that there may be exceptional circumstances that mean that it is not viable to deliver these affordable targets. Paragraph 6.30 states that where concerns over viability are raised, the onus will be on the developer to demonstrate through the submission of a viability appraisal that the required contribution would make the development unviable. Where it is demonstrated that there are circumstances that impact upon the delivery of affordable housing, the Council may negotiate the level, type and tenure of provision. This accords with national planning policy (paragraph 4.2.22 of PPW). The Deposit RLDP will contain similar policy text. Further guidance will continue to be provided in the Affordable Housing SPG.</p> <p>The largest allocation in the Preferred Strategy is Land at North East Barry, which will serve the Barry area, which has the largest need. A 576-dwelling scheme at Upper Cosmeston Farm in Penarth is also being rolled forward into the RLDP. The latest LHMA indicates that there is need for affordable housing in all communities within the Vale.</p> <p>New affordable housing is required to meet WG Beautiful Homes and Spaces standards, which sets minimum functional quality standards. For many unit types, the minimum floor area is greater than for similar private units. All new development will need to incorporate placemaking principles within them which will improve the standard of design.</p>	<p>N/A</p>
<p>There should be specific consideration within the provision of affordable homes for key-worker roles.</p>	<p>The allocation of affordable homes to eligible applicants is undertaken in accordance with the Council's Homes4U Allocations Policy and is based on priority need. One of the criteria considered in prioritising need and assigning bandings to applicants is meeting the 'positive community contribution' which includes those who meet the key worker housing requirement.</p>	<p>N/A</p>

Support the inclusion of an affordable housing policy, including specialist housing and accommodation. It would be more meaningful to discuss required housing mix and tenures at planning application stage.	Support is welcomed. Further detail on the affordable and specialist housing policy will be provided at Deposit stage. The Deposit RLDP will identify a broad tenure split requirement between social rented and intermediate homes based on the findings of the latest LHMA. However, the unit type by size will be considered on a site-specific basis at planning application stage based on the LHMA and the latest waiting list information.	Include tenure split for social rented and intermediate units in the Deposit RLDP.
Policy SP8 does not appear to comply with the assessments in the Older Person's Housing Strategy given that it relies and focuses on the provisions of strategic housing policies SP3 and SP4, where growth is located and Key Sites identified, to deliver specialist housing need over the plan period.	Small scale affordable housing led development proportionate to the scale of the settlement will be allocated within Minor Rural Settlements if appropriate sites are available. This could include housing suitable for older persons, subject to identified/evidenced need.	N/A
Affordable housing requirements need to be revisited as the Preferred Strategy identifies a minimum requirement for such housing at a level which is four times lower than is considered necessary.	To help address the need identified, the Council anticipates that the current land supply identified in SP3 together with new allocations will deliver a minimum of 2,000 affordable dwellings through the planning system over the 15-year plan period. It is intended that the final new methodology LHMA will be included as part of the evidence base for the Deposit Plan once signed off by Welsh Government. The overall affordable housing target will therefore be revised for the Deposit LDP to take account of this as well as additional housing sites to be identified and to reflect updated viability evidence.	N/A
Why are the developments only 30/35%? Surely the housing needs would reflect a much higher requirement.  What type of affordable housing? (intermediate rent, homeownership, social rent etc?).	The Preferred Strategy replicates the requirements in the adopted LDP, which sets targets of 30-40% of units on market sector sites to be affordable. These targets will need to be reviewed as part of ongoing viability work for the Deposit RLDP. The viability review will also need to consider the costs of development, including other Section 106 requirements. Whilst the need for affordable housing is recognised, targets must be viable and not prejudice the delivery of other objectives.	N/A

	<p>Further detail on the affordable and specialist housing policy will be provided at Deposit stage. The Deposit RLDP will identify a broad tenure split requirement between social rented and intermediate homes based on the findings of the latest LHMA. However, the unit type by size will be considered on a site-specific basis at planning application stage based on the LHMA and the latest waiting list information.</p>	
<p>There is a need for housing but policy needs looking at. Nothing is built for people who want to downsize into a 2-bed bungalow. A provision for affordable and social housing but the elderly are forgotten again.</p>	<p>Paragraph 6.109, under SP8: Affordable and Specialist Housing highlighted that the strategy projects that by 2037 there will be a need for some 1,357 specialist age designated housing, retirement housing and housing with care. Paragraph 6.110 identified that both Strategic Housing Policies SP3 and SP4 will make provisions for new housing developments to include specialist housing such as older persons housing as part of the overall mix with residential developments, including where affordable housing is sought through planning contributions. Policy SP8 identifies that housing for older persons covers a spectrum of needs, from sheltered housing to extra care housing and care homes. Further details on the affordable and specialist housing policy will be published as part of the Deposit RLDP.</p>	<p>N/A</p>

## SP9 Gypsy & Travellers

Issue raised	Council response	Action
<p>Why are separate sites required?</p> <p>No further gypsy and traveller sites in the Vale.</p>	<p>The Housing (Wales) Act 2014 requires the Council to carry out an assessment of the accommodation needs of Gypsies and Travellers within its area by way of a Gypsy and Traveller Accommodation Assessment (GTAA). Where a need is identified, the Housing (Wales) Act 2014 and the Mobile Homes (Wales) Act 2013 direct that the local authority must exercise its powers so far as may be necessary to meet those needs and Planning Policy Wales (Edition 12 February 2024) paragraph 4.2.36 directs that where a need is identified within a GTAA, the planning authority should allocate sufficient sites within their development plan (RLDP) to ensure that this need can be met. The Council is therefore statutorily required to consider and provide for gypsy and travellers when a need is identified within the GTAA.</p>	<p>N/A</p>
<p>Provision of traveller sites per se is fine. It's the state they end up in (see Rover Way in Cardiff) why should local taxpayers subsidise a subsection of society who refuse to abide by the society's norms.</p>	<p>Comments noted.</p>	<p>N/A</p>
<p>The Preferred Strategy does not meet the needs of Planning Policy Wales (4.2.35), Circular 005/2018 (paragraph 35) and the Development Plans Manual (5.80-5.85). You are not specific about site selection and fail to mention locations of unauthorised encampments in the Vale.</p>	<p>The comments relate to the requirements of the Council to include information on gypsy and travellers within the development plan as specified in Planning Policy Wales (4.2.36), Circular 005/2018 (paragraph 35) and the Development Plans Manual (5.80-5.85). While the Preferred Strategy (PS) is the first formal consultation stage of the development plan process, it is not the final development plan that will be considered at a public inquiry and ultimately adopted. While Policy SP9-Gypsy and Travellers, of the PS addresses the accommodation need identified in the Councils latest GTAA, the policy does not allocate a site(s) or include criteria against which future site allocations and/or development applications will be assessed. These more detailed policies and site allocations will be included within the draft Deposit Plan.</p>	<p>Council to continue to progress work on identifying a suitable gypsy and traveller site or sites that meet the need identified in the GTAA. This work to be in accordance with</p>

		the requirements of the relevant Welsh Government Regulations and guidance relating to gypsies and travellers.
Adequate Green areas should be available for travellers to use at their convenience.	Comment noted.	N/A
If good progress has been made in meeting the gypsy traveller allocation in the Vale, the land currently allocated in Llangan for a gypsy traveller site in the adopted LDP should be removed and transferred to Llangan Community Council for community projects.	The gypsy and traveller site at Llangan is currently identified in the adopted LDP under policy MG5 Gypsy and Traveller Site for 2 pitches and the site is currently occupied by a long-term resident. The adopted LDP will be replaced by the RLDP once adopted and the issue of removing the site from the adopted LDP is therefore not relevant. The need for the site at Llangan remains extant as is evidenced by the current occupation and the transfer of the site for alternative uses is therefore not considered appropriate.	N/A
Amend wording to acknowledge that this type of development is vulnerable to flooding.	Policy SP9 Gypsy and Travellers of the Preferred Strategy addresses the accommodation need identified in the Council's latest GTAA. The policy does not include development criteria against which future site allocations and/or development applications will be assessed as these will be included in the more detailed policies and site allocations within the draft Deposit Plan.	Include reference to the vulnerability of gypsy and traveller sites to flooding within the draft Deposit Plan. Include appropriate wording on the implications of flooding on

		gypsy and traveller sites within relevant polices within the draft Deposit RLDP.
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## Policy SP10 Retail, Commercial and Service Centres

Issue raised	Council response	Action
<p>I would hardly describe The Square in St Athan as a retail, commercial and service centre. There are 2 'corner' shops, one of which includes some post office facilities, a pharmacy, a Chinese takeaway, a kebab shop, and hairdressers.</p>	<p>Comment noted.</p>	<p>N/A</p>
<p>You say there are preferred centres for retail development in Llantwit Major and St Athan yet there is a current application for a supermarket in Llanmaes. That cannot be allowed.</p>	<p>The planning application for an A1 use at Llanmaes is currently under consideration by the Council and will be determined through the normal planning application process. The application will be assessed against national policy objectives and the policies contained in of the adopted Vale of Glamorgan Local Development Plan 2011-2026 and will be determined prior to the adoption of the RLDP.</p>	<p>N/A</p>
<p>The PS provides no meaningful analysis or solutions to a failing, dying, deserted Town Centre in Barry. This is illustrated by the weakness of the Council's planning function, that allows and supports an incinerator to be built close to the Town Centre but cannot facilitate an effective bus service.</p> <p>There is little in the PS that will assist in rescuing the failing Barry Town Centre, and little strategic analysis of mitigation and alternative uses of existing properties. This document will accelerate the demise of the town centre, not enhance it. There is a lack of imagination and the use of planning</p>	<p>Policy SP10 Retail, Commercial and Service Centres sets out the retail hierarchy within the Vale of Glamorgan and directs that these retail centres are the preferred locations for a range of uses. While the policy adopts a more flexible approach to non-retail uses within town centres to maintain and enhance the long-term viability and vitality of the centre, new development in retail centres should accord with the defined role of each centre and with the placemaking principles set out in Policy SP5 Placemaking. The Council considers that this holistic approach will encourage the regeneration of the Vale's town and district retail centres and enable them to evolve into multifunctional centres containing a broad range of retail, leisure and services. The retail policies of the Deposit RLDP will also seek to encourage the take up of empty premises in centres where there may be higher vacancy rates, and these detailed policies will set the structure for enabling an appropriate and potentially more flexible use of properties in retail centres.</p>	<p>N/A</p>

and regeneration strategies that have been successful elsewhere.		
The VoG Council have all but killed Barry town centre through over taxing and charging for car parks. There is nothing left to bring people to the town.	The issue of car parking charges at Vale facilities is outside of the remit of the RLDP. Policy SP10 Retail, Commercial and Service Centres sets out the retail hierarchy within the Vale of Glamorgan and directs that these retail centres are the preferred locations for a range of uses. While the policy adopts a more flexible approach to non-retail uses within town centres e.g. commercial, leisure, residential etc. to maintain and enhance the long-term viability and vitality of the centre.	N/A
I agree with the principle however none of this is reflected in any of the plans. The RLDP is silent on what additional facilities and essential shops and services will be included or even considered. For St Athan if the infrastructure, access and parking is not addressed there can be no opportunity for improved services.	Support is welcomed. The Council continues to explore opportunities to enhance services and facilities within St Athan including the provision and location of new retail proposals, the provision of a new railway station and associated car parking to serve St Athan and educational provision and open space. Further details will be set out in the Deposit Plan.	Further consideration of services and facilities to be undertaken prior to Deposit Plan.
Only limited retail outlets in the Square, St Athan. If the proposed developments go ahead more retail will be needed, but only one extra shop for an increase in population of some 5,000 people. Land needs to be set aside in development for additional retail units, which otherwise will be absorbed into extra housing. Provision needs to be made for future retail capacity.	The Council continues to explore opportunities to enhance services and facilities within St Athan including the provision and location of new retail proposals. This may include the provision of mixed uses on key housing sites identified within the Preferred Strategy as part of the master planning process. Further details will be set out in the Deposit Plan.	Further consideration of the mix of uses in St Athan to be undertaken prior to Deposit Plan.
VOG is continuing to specify Rhoose as a village yet is planning to increase his	As part of the background evidence in support of the RLDP Preferred Strategy, the Council undertook an appraisal of the services and facilities of existing settlements within the Vale of Glamorgan. The assessment	N/A



<p>using beyond the level of a number of towns. Which is it? Rhoose cannot function with a basic number of shops, with the already high development, Rhoose should have the same facilities as a district centre.</p>	<p>identifies Rhoose as a 'Primary Settlement' i.e. a settlement that plays an important role in meeting housing need and in providing some key local services and facilities; they have the capacity to provide for the needs of residents as well as the needs of the surrounding wider rural areas.</p> <p>The Council continues to explore opportunities to enhance services and facilities within Rhoose and this may include the provision of mixed uses on key housing sites identified within the Preferred Strategy as part of the master planning process. Further details will be set out in the Deposit Plan.</p>	
<p>The retail hierarchy for Dinas Powys should include Dinas Powys: Castle Court/The Parade as a Local Centre given it provides a similar retail offer to the designated local centres at Cardiff Road and in the village centre.</p>	<p>The retail hierarchy used to characterise the retail centres within the Vale of Glamorgan was defined in previous development plans. While there have been minor changes within the retail centres over the intervening years, the extent of the centres has remained reasonably constant, and the Council is of the view that the characterisation of the centres remains robust. In this regard 'Local Centres' are defined as being of more than 10 units but less than 3,500m<sup>2</sup> floorspace and 'Neighbourhood Centres' are defined as being between 3 and 10 retail units. Castle Court/The Parade at 9 retail units remains below the identified threshold for a local centre.</p>	N/A.
<p>There is no space and no ability for the village centre at Dinas Powys to "flex". It is a small village centre which is already extremely busy. There is no capacity to increase any shops, leisure or commercial facilities to support further employment in the area.</p>	<p>Comment noted.</p>	N/A

## Policy SP11 Retail Floorspace

Issue raised	Council response	Action
We need more shops for economic competition and to ensure eco goals are rescued.	Comment noted.	N/A
There are many shops closed down mainly because of high rents.	Comment noted.	N/A
I agree that retail development should be concentrated at existing centres.	Support is welcomed.	N/A
Priority should be to ensure full utilisation of empty spaces prior to new developments.	Comment noted. The retail policies of the Deposit Plan will also seek to encourage an appropriate diversity of uses within existing retail centres to encourage the take up of empty premises and to improve the attractiveness of centres such as Barry where there may be higher vacancy rates.	N/A
There is inadequate retail to support the existing population. For example, the only supermarket available to all residents of Penarth, Sully, Dinas Powys and Llandough is Tesco at Terra Nova way in Penarth. Subsequently the majority of the population avoid the congestion in favour of online shopping deliveries! This increases traffic, carbon monoxide, imported products etc. This is but one example of the wildly insufficient amenities available to this massive population.	<p>Policy SP11 Retail Floorspace of the Preferred Strategy identifies that within the Vale of Glamorgan there is capacity for additional convenience and comparison retail floorspace over the Plan period i.e. to 2036. Spatially, the study identifies the potential need for additional convenience food retailing within the retail centres of Barry, Penarth and Llantwit Major which would lead to potential improvements in the vitality and viability of those centres.</p> <p>The retail policies of the Deposit Plan will seek to encourage an appropriate diversity of uses within existing retail and to improve the attractiveness of retail centres within the Vale of Glamorgan.</p>	N/A
There is insufficient retail in Dinas Powys as a whole at present with no intention to change this.	The Council continues to explore opportunities to enhance services and facilities within Dinas Powys, including the provision and location of new retail proposals. This may include the provision of mixed uses on key	N/A

	housing sites identified within the Preferred Strategy as part of the master planning process. Further details will be set out in the Deposit Plan.	
<p>We disagree that there is a need for the amount of convenience floorspace stated.</p> <p>Analysis of BP13 shows that the Vale is covered by Zones 1, 4 and 5 where the population increase is 7,893 (Table 1a). This increases convenience spend by around £19m. Using the sales density of £9,978.3 (Table 7a), this suggests capacity for around 1,900 sqm of convenience floorspace by 2036, less than Nexus suggest. The difference is due to population increase in the outer zones i.e. Cardiff and Bridgend. Any need for additional convenience provision in these zones should be met locally, not within the Vale.</p>	<p>Retail capacity forecasting is an exercise in considering where existing trade comes from, and whether those trends are likely to persist. In keeping with all such similar studies the Vale of Glamorgan Retail and Leisure Study recognises that the Vale does not have a closed border. It has flows of trade in to and out of the surrounding areas. This is why the Study considers not only the areas within the Vale itself, but also those nearby. In this instance, the Study has considered an 'Inner Study Area' which broadly equates to the area of the Vale (Postcode Zones 1, 4 and 5 shown at Appendix A to the Study), as well as considering an area outside the Vale (Postcode Zones 2 and 3, also shown at Appendix A). The Household Telephone Survey which accompanied the Retail Study questioned residents in all zones about their propensity to spend on retail and leisure items inside the Vale and elsewhere. This enabled a detailed depiction of market shares in Appendix C to the Study.</p> <p>Related specifically to the objection received, Table 4b at Appendix C to the Study highlights that the Vale currently attracts £70.3m of convenience goods spending from residents of Zones 2 and 3 per annum. By way of contrast, the 'Inner Study Area' generates £275.7m per annum. It would therefore be completely false to ignore that stores within the Vale currently receive approximately 20% of their trade from outside the Inner Study Area and, as the objector suggests, to assume that this should instantly be met somewhere else. This is an unrealistic suggestion because a) this is evidentially spend which is being carried out in the Vale and is backed up by empirical evidence, and b) the corollary would be to assume that all spend carried out by residents of the Vale elsewhere (e.g. Cardiff or Bridgend), should automatically be re-directed to the Vale itself (this itself amounts to £44.6m per annum, Table 4b). Neither proposition is sustainable as it is inevitable that there will be flows of trade in either direction as a result of factors such as people shopping near to where they might work, or a wide range of other reason such as brand choice or linked trips to other forms of shopping or entertainment. The Retail Capacity exercise has therefore</p>	N/A

	<p>been carried out based on appropriate empirical evidence and in line with the prescribed standard methodology in PPW and TAN4 and there is no basis on which to amend the capacity forecast in line with the objection.</p>	
<p>Rhose has limited retail units with higher prices for items. Transport to key retail settlements is poor or non-existent meaning residents have to drive.</p>	<p>The Council continues to explore opportunities to enhance services and facilities within Rhose, including the provision and location of new retail proposals. This may include the provision of mixed uses on key housing sites identified within the Preferred Strategy as part of the master planning process. Further details will be set out in the Deposit Plan.</p> <p>Rhose is served by a train station, with proposals to increase the frequency of service to 2 per hour.</p>	N/A
<p>Support for the policy intention to direct identified retail need to town and district centres. Quantitative and qualitative capacity has been evidenced in the RCLS 2023 for additional retail floorspace to be delivered in Llantwit Major. It is recognised this would lead to potential improvements in the vitality and viability of Llantwit Major. The delivery of Site ID 379 is demonstrated to meet the relevant retail policy tests in respect of need, the sequential approach and impact, as confirmed by Nexus (author of the Council's evidence base) in its audit of planning app ref: 2022/00907/FUL (currently pending determination).</p> <p>In the same manner the Preferred Strategy seeks to allocate land for housing need, the Preferred Strategy e.g. Policy SP11 must allocate land to</p>	<p>Support is welcomed.</p> <p>Policy SP11 Retail Floorspace of the Preferred Strategy identifies that within the Vale of Glamorgan there is capacity for between 4,282 and 5,862 sqm net of convenience food retail floorspace and 432 sqm net and 679 sqm net of comparison floorspace over the Plan period i.e. to 2036. Spatially, the study identifies the potential need for additional convenience food retailing within the retail centres of Barry, Penarth and Llantwit Major which would lead to potential improvements in the vitality and viability of those centres.</p> <p>While the retail assessment identifies a need within these centres, it is clear (para 12.39 refers) that ‘...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.’</p> <p>The assessment therefore does not directly support the planning application for A1 use at Llanmaes (Candidate Site 379) which is currently under consideration by the Council. This application will be determined through the normal planning application process against national policy objectives such</p>	N/A

<p>deliver identified retail need; indeed, as sequentially preferable, it should allocate land at Site ID 379 to accommodate additional retail development at Llantwit Major. It is important to note a failure to identify sites to deliver identified retail development needs may render the RLDP unsound.</p>	<p>as 'Town Centre First' and the policies contained in of the adopted Vale of Glamorgan Local Development Plan 2011-2026.</p> <p>In respect of retail allocations, the Council will consider this matter as a part of the development of the Deposit Plan.</p>	
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## SP12 Infrastructure

### Comments on Policy SP12

Issue raised	Council response	Action
<p>We are pleased that strategic importance is placed on ensuring that new development contributes towards necessary infrastructure as developers may be required to fund improvements to water and sewerage networks to deliver development sites.</p>	<p>Support is welcomed.</p>	<p>N/A</p>
<p>Welcome the inclusion of Green Infrastructure in the list of planning obligations that developers may be required to provide. We advise that explicit reference to provision of sensitive and long-term management of green spaces and habitats for biodiversity is also included.</p>	<p>Support is welcomed.</p> <p>The comments in respect of the long-term management of green infrastructure and biodiversity are valid potential uses for planning obligations, but this is equally valid for many of the other types of community infrastructure. It is therefore suggested that the last sentence of the first paragraph be amended to read 'Community infrastructure may include the provision or improvement <i>and long-term maintenance of:</i>'</p>	<p>Amend the first paragraph to read 'Community infrastructure may include the provision or improvement <i>and long-term maintenance of:</i>'</p>
<p>Policy 'will seek to secure new and improved community infrastructure, facilities and services'. Seeking is no good. The facilities are a MUST.</p>	<p>The Council must operate within the guidelines of what is a reasonable obligation from developers. What is reasonable depends on local circumstances, recognising that in certain cases viability may be an issue. However, it is important that the wording is sufficiently strong and therefore the term 'seek to' should be removed.</p>	<p>Strengthen the wording of the wording by removing reference to 'seek to.'</p>

<p>The Council allows too many issues to be 'reserved matters' in planning permissions. This results in challenges being made to permissions before, during and after implementation.</p>	<p>The submission of outline and reserved matters applications accords with legislation, however, any issues of principle will be considered at the outline stage.</p>	<p>N/A</p>
<p>The policy is overly prescriptive and community infrastructure and planning obligations should be based on site specific circumstances.</p>	<p>Policy SP12 considers the infrastructure need generated from a development against the type of development and local circumstances and needs arising from the development. The policy aims to provide appropriate services and facilities to meet additional need from the development and the pre-existing need from existing settlement within reason. However, there will still be a consideration of matters on a site-specific level. This will be set out in the plan for Key Sites.</p>	<p>N/A</p>

## General Infrastructure Comments and Objections

The comments in this section relate to general comments about infrastructure in the Vale. Representations made in respect of site-specific infrastructure are dealt with in relation to the site they refer to.

Issue raised	Council response	Action
<p>Need for more primary and secondary schools. Current schools over-subscribed.</p> <p>All pupils should be able to attend their catchment school which should be within walking distance. Children currently having to travel out of area.</p> <p>Lack of Welsh Medium education in parts of the Vale.</p> <p>Poor school transport means children can't take part in extra-curricular activities.</p> <p>Nurseries and playgroups can't cope.</p>	<p>The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly.</p> <p>The school transport provision is not poor. The Council provides school transport as per the Learner Travel (Wales) Measure. This is Home to School transport and is one journey AM and PM.</p>	<p>The Planning Department will continue to liaise with the Sustainable Communities for Learning Team.</p> <p>The Deposit Plan will be supported by a background paper which considered the impact of new development on school capacity and how this can be addressed.</p>
<p>Infrastructure needs to be in place before development commences.</p> <p>A requirement to meet community infrastructure commitments should be made before any profit can be released.</p>	<p>Section 106 agreements will specify the timescales for delivery of infrastructure or contributions towards infrastructure. It is not always necessary for this to be provided upfront as some infrastructure would require people to be living on a site for it to be sustainable. However, this will be determined on a site-specific basis. The Deposit RLDP will provide further information on the timescales for the delivery of infrastructure.</p>	<p>Provide further information on the timescales for the delivery of infrastructure for the Deposit RLDP.</p>



<p>Infrastructure planning must take account any planned population growth.</p>	<p>The Council are liaising with infrastructure providers to ensure population and housing growth is factored into the forward planning processes.</p>	
<p>Section 106 monies will not go to the local community but elsewhere to offset budget shortfalls.</p> <p>No funding available for community led projects.</p>	<p>Where Section 106 funding is received for a specific use, the Council's Section 106 officer will work with local Community Councils to determine an appropriate project.</p> <p>The funding is secured for the provision of infrastructure and only projects that fall within this definition can be considered.</p>	<p>N/A</p>
<p>Local health care facilities are already oversubscribed.</p> <p>Difficult to get a doctor or dentist appointment.</p> <p>Public transport poor or non-existent to some GP surgeries</p> <p>Poor response times for ambulances</p> <p>Pressure on health provision will affect the quality of life for existing residents.</p>	<p>The Council are liaising with Cardiff and the Vale University Health Board to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. Through this collaboration, CAVUHB will be able to plan for future service requirements and plan accordingly.</p> <p>Emergency service response times are not within the remit of the RLDP.</p> <p>The Council considered the pre-existing health care needs settlements as well as the additional need of the development when considering health infrastructure obligations. This will be supported by the policy SP6 supporting the provision of the new and enhanced community and healthcare facilities</p>	<p>The Council will continue to liaise with CAVUHB.</p> <p>The Deposit Plan will be supported by a background paper which considered the impact of new development on health services and how this can be addressed.</p>

<p>Road network can't support increased traffic volumes.</p> <p>Too many accidents on junctions of roads.</p>	<p>The Council has undertaken a Stage 1 Strategic Transport Assessment, which largely uses pre-pandemic data, and highlights that there are junction capacity issues in several locations within the Vale of Glamorgan.</p> <p>A Stage 2 Strategic Transport Assessment will be published alongside the Deposit Plan. This will include updated data, which will consider post-pandemic travel patterns. This will also identify any mitigation that may be required in to reduce the impact of the additional traffic from the sites.</p> <p>If new development is considered to have an impact on safety, consideration will be given to any mitigation to address this.</p>	<p>N/A</p>
<p>Bus service infrequent, slow and unreliable, particularly in rural Vale.</p> <p>Bus services have been cut recently.</p> <p>Train service only hourly – half hourly promised but hasn't happened.</p> <p>Train services over-subscribed.</p> <p>St Athan station needs to be provided before new developments are constructed.</p> <p>The Council have not engaged with TfW or bus companies on the RLDP.</p>	<p>It is acknowledged that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of bus services. New development in an area will increase the population base of potential bus users, which can help support route sustainability.</p> <p>TFW have committed to introducing additional rail services at peak times and they will also be introducing new trains to the line with increased capacity. The Council will continue to engage with TFW to enhance services on the VoG Line.</p> <p>The Council has also actively engaged with TFW and the Department for Transport in developing the proposals for a station at St Athan, and in March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train station and St Athan, as identified within the Preferred Strategy.</p>	<p>N/A</p>

<p>Active travel routes not a good use of finances. Not suitable in inclement weather or for shopping or appointments.</p> <p>Query how older people benefit from active travel routes.</p> <p>Active Travel routes don't link to major settlements.</p> <p>Parking on cycle paths makes them unusable.</p>	<p>Llwybr Newydd prioritises Active Travel and it is important part of the Preferred Strategy for developments to link to existing and future Active Travel routes. They can be used by all, including older people.</p> <p>Active travel is not just cycling - it is walking, wheeling and cycling. Pedestrian routes will be improved and made accessible to all. The Active Travel Network Map identifies a number of future routes, which includes links between settlements.</p> <p>The Council recognise that parking on cycle lanes undermines the capacity of cycle lanes to function appropriately. Where possible, segregated cycle lanes should be implemented.</p>	<p>N/A</p>
<p>The airport needs better road links to become successful</p>	<p>Previous proposals for a road link between the M4 and the A48 have been considered but in accordance with Cabinet decision C536 the scheme was not progressed. The proposal would not accord with the Wales Transport Strategy and would have implications for the climate change agenda.</p>	<p>N/A</p>
<p>The Preferred Strategy should specify exactly how and where retail and leisure space will be developed.</p> <p>There is space within the new sites for other uses but all that is proposed is housing.</p> <p>There is a need for more shops.</p>	<p>It is anticipated that a mix of uses will be delivered on the largest of the key sites. The illustrative layouts included within the Preferred Strategy identify some potential uses but through further stakeholder engagement on placemaking for these sites, it is hoped that there uses can be refined.</p>	<p>N/A</p>

<p>Barry Waterfront is largely unfinished. Developers have abandoned sites leaving no S106 agreements finalised. What assurances are to be provided to residents?</p>	<p>Section 106 is an agreement with developers that has an agreed timeline to provide obligations. If the developers fail to meet their obligations, the Council can take enforcement action.</p>	<p>N/A</p>
<p>Development should only be brought forward if the necessary infrastructure and planning obligations identified at the outset are met in full by the developer. If viability concerns mean that developers cannot provide this, the development should not be allowed to proceed.</p>	<p>Development will be required to deliver the infrastructure necessary to make the site acceptable in planning terms. If the developer is unable to demonstrate this, this may lead to an application being refused. However, each application will need to be considered on its merits.</p>	<p>N/A</p>
<p>Concern that the community are not consulted on s106 agreements</p>	<p>The Council intend to hold placemaking workshops for the key sites to engage with the community of the layout and potential mix of uses on the site. The community will also have the opportunity to comment on the Deposit Plan, which will set out clear requirements for sites.</p>	<p>Undertake placemaking workshops in respect of the key sites.</p>

<p>What mechanism is in place to decide viability?</p>	<p>The Deposit Plan will be informed by a high-level viability assessment which set appropriate targets for affordable housing and requirements for other planning obligations. In addition, all sites have submitted site specific viability information, which will need to be refined as part of the preparation of the plan, which will help demonstrate deliverability.</p>	<p>N/A</p>
<p>The RDLP does not consider how "the provision of accessible community infrastructure that is tailored to meet the needs of the community, including high quality health, education, training, cultural, social, recreation, and community facilities and spaces." is be met (Objective 4). Rather deferring it to post the RDLP.</p>	<p>The Deposit Plan will set out the infrastructure necessary to support the key sites, together with any wider infrastructure necessary to support the increase in population.</p>	<p>N/A</p>
<p>I understand S106 monies is for new residents to become part of a current community, but how will current communities adapt to retain their status once all these developments are built? Developments of significant sizes will create sub-communities, and there is no sense of community in these areas. You create and us/them. How do you plan to create a cohesive environment?</p>	<p>The Council intend to hold placemaking workshops for the key sites to engage with the community of the layout and potential mix of uses on the site. This will also be an opportunity to consider the integration of the new development with existing communities.</p>	<p>N/A</p>

<p>There are no capital plans to address the sewage crisis in the Vale and this Strategy, if implemented, will add to the volume of untreated sewage being pumped into the sea, damaging ecology and potentially resulting in adverse health to people swimming and using our coast for leisure purposes.</p> <p>The Council should have planned increased sewage treatment capacity and levied the housing developments to cover the costs. It takes time to plan new sewage works to bring them into the 5-year Ofwat plan, so this delay has to be built into the RLDP.</p> <p>The Sully Moors/Cog Moors is already over capacity.</p>	<p>DCWW have been consulted on the Preferred Strategy and have indicated that Cog Moors Wastewater Treatment Works has capacity to accommodate the domestic foul flows from the key sites in this area.</p> <p>Where there is limited capacity at a Wastewater Treatment Works (WwTW), dependant on the scale and pace of development developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a s106 commercial agreement would be required between the developer and Welsh Water to deliver the necessary improvements.</p>	<p>N/A</p>
<p>The RLDP fails to address storm flooding. There is a need for a programme of surface water drains and soakaways (SuDS), to remove highway drainage from their sewers.</p>	<p>Flooding is key risk for development and policy SP15 aims to direct all developments away from areas of flood risk and ensures that new developments have suitable controls on surface water runoff using suitable drainage and nature-based solutions. All development must be considered against TAN 15 to ensure that it does not take place in locations of unacceptable flood risk.</p>	<p>N/A</p>

<p>More investment required in community venues/meeting spaces.</p>	<p>There are opportunities for a mix of uses on the largest of the Key sites, which could include community spaces. Furthermore, community facilities are specifically referenced under Policy SP12.</p>	<p>N/A</p>
<p>National Grid Energy Transmission advises on the position of its assets.</p>	<p>The comments are noted.</p>	<p>N/A</p>
<p>Increased risk of flooding due to new development.</p>	<p>A strategic flood risk analysis in collaboration with 10 local authorities in south Wales has been conducted. Flooding is key risk for development and policy SP15 aims to direct all developments away from areas of unacceptable flood risk and ensure that new developments have suitable controls on surface water runoff using suitable drainage and nature-based solutions. All development must have compliance with TAN 15 which ensures developments does not take place in locations of unacceptable flood risk.</p>	<p>N/A</p>

<p>Focus is on housing numbers, not infrastructure</p>	<p>The RLDP will deliver infrastructure improvements alongside new development. Future detail will be provided in the Deposit RLDP.</p>	<p>N/A</p>
<p>CIL will be brought on any new development and therefore it would need to be a requirement in any event and therefore should not be considered in the context of the amended LDP.</p>	<p>A Community Infrastructure Levy hasn't been adopted in the Vale of Glamorgan and any development would therefore be required to make necessary contributions through the Section 106 process.</p>	<p>N/A</p>
<p>Current infrastructure should be maintained to a good standard.</p>	<p>In many cases, Section 106 agreements will secure funding for the maintenance of facilities alongside the facility itself.</p>	<p>N/A</p>



## SP13 Employment Growth

Issue raised	Council response	Action
<p>Support: Priority must be to redevelop existing brownfield sites and upgrading them to make them future proofed.</p> <p>Support: although sceptical as to delivery of employment</p> <p>Support: However, there is nothing in this plan which actively encourages any businesses to occupy these zones, some of which do not yet exist</p> <p>Support: Deliver would depend on investor interest. The current lack of infrastructure to the M4 and poor public transport makes these sites unsuitable to many businesses.</p> <p>Support for the allocation 48.5ha of land at Bro Tathan East for B1/B2/B8 uses, including complimentary ancillary non-B uses, as set out within policy SP13.</p> <p>Support for Policy SP13 and provision of 67.8 hectares of employment land, and the delivery of up to 5,338 jobs, provision of 168 net hectares of employment land.</p>	<p>Comments noted and support is welcomed.</p>	<p>N/A</p>

<p>Disagree with Employment Land Provision</p> <p>There is a lack of evidence of the requirements of the land identified for employment.</p> <p>Where are the jobs coming from to support new houses?</p> <p>Many of the proposed schemes building on productive land, developments not in appropriate locations. Commercial sites proposed do not exploit existing sites e.g. Barry Dock, St Athan.</p> <p>Redevelopment of current empty or rundown industrial/commercial sites must be a priority before development of new sites.</p> <p>Encouraging local employment and hybrid working must be encouraged throughout the plan.</p> <p>There are not enough employment opportunities for the existing population.</p> <p>Most employment opportunities are in Cardiff which Rhose does not have good transport links to get to.</p>	<p>The Council's Employment Land Supply Study sets out the Council's employment land requirements over the plan period (background paper BP12). The study methodology included market research with property developers, investors, and major private employers in the area.</p> <p>The housing requirement identified within the RLDP are aligned to the projected change in the population and household growth over the plan period 2021-2036. This population change would result in an increase in the number of people of working age living in the Vale of Glamorgan of 4,875. This number of working aged people closely aligns with the 5,338 anticipated number of jobs that could be supported by the employment sites identified within the RLDP.</p> <p>The RLDP identifies a broad range of employment sites include major brownfield regeneration proposals at Barry Docks and Aberthaw, as well as sites with existing established employment areas.</p> <p>The RLDP seeks to provide further local employment opportunities through identifying a range of employment sites to attract inward investment.</p>	<p>N/A</p>
<p>We note the employment allocations. We advise that at the master planning stage will be important in ensuring that</p>	<p>Comments noted. Masterplans are currently being prepared for the allocated employment regeneration sites at Barry Docks and Aberthaw</p>	<p>Ensure that NRW are engaged within</p>

any constraints from ecological surveys are carefully considered, particularly about important habitat and integrated into any future developments.	Power station. The Council shall advise the parties preparing these to engage with NRW in the development of these.	the master planning of employment sites.
The LPA appear to have adopted the most convenient approach to delivering employment land, which is noted to also be based upon historic take-up. The LPA should be aspiring to achieve a more aspirational and uplifting provision of employment land	The Council's Employment Land Supply Study sets out the Council's employment land requirements over the plan period (background paper BP12). The number of potential jobs that can be supported by the employment land provision closely aligns to the increased number of the working age population over the plan period. Notwithstanding this, the RLDP identifies a further 2 employment regeneration areas located at Barry Docks and the former Aberthaw Power station which shall provide further opportunities for economic growth.	N/A
Include a specific policy for MoD St Athan in the RLDP.	Comments noted. The Council are presently reviewing the policies within the adopted plan and shall consider the proposed additional policy as part of this work.	Consider inclusion of a policy for Mod St Athan within the Deposit Plan.

### SP13.1 Land east of Cardiff Airport, Rhoose (16.3 ha net)

Issue raised	Council response	Action
You clearly have not factored in the enormous requirement for WG handouts or the bailout that is going to happen in Port Talbot.	This is an issue that cannot be addressed through RDLP.	N/A
Disagree with the new college built near the airport. It will cause traffic problems and there is a poor bus service.	Comments noted. These proposals are at an early stage- consideration of public transport access will be considered as part of any future planning application.	N/A

**SP13.2 Land south of Port Road (Model Farm), Rhoose (44.75 ha net)**

Issue raised	Council response	Action
<p>Objections raise to Model Farm on the following grounds:</p> <ul style="list-style-type: none"> <li>• The Council has rolled over the Model Farm site into the PS despite rejecting the planning application.</li> <li>• Should not be included in the RLDP as there is a current appeal pending.</li> <li>• Not Financially Viable</li> <li>• Loss of biodiversity</li> <li>• Inadequate water and sewage provision</li> <li>• Impact on Grade II listed buildings and county treasures</li> <li>• Inadequate road infrastructure</li> <li>• Does not meet the key themes of the RLDP- e.g. green economy.</li> <li>• Oversupply of Employment Land in the Vale</li> <li>• No guarantee that the units will be occupied.</li> <li>• Increase Flood Risk</li> <li>• Increased road traffic</li> <li>• Brownfield sites should be developed.</li> <li>• Wish to see the site redesignated as green wedge</li> </ul>	<p>The issues raised in respect of the financial viability and delivery of the proposal as well as matters relating to flood risk, traffic, biodiversity and impact on listed buildings and county treasure have been considered as part of the Council’s consideration of the planning application (2019/00871/OUT).</p> <p>The RLDP acknowledges the current situation of the appeal for non-determination. The appeal is currently with the Planning and Environment Decisions Wales (PEDW). Consideration will be given to the outcome of this appeal when determining the status of this site within the Deposit RLDP. However, it is noted that the reasons for refusal are related to heritage and reliability of biodiversity information, rather than the principle of the allocation, and consequently there is not considered to be a conflict with proposing allocation at this stage.</p>	<p>Consideration will be given to the outcome of this appeal when determining the status of this site within the Deposit RLDP.</p>

and maintained for agriculture and wildlife.		
The decision to retain the site as a Major Employment Allocation within the preferred strategy is fully supported.	Support is noted.	N/A

### SP13.3 Bro Tathan East, Aerospace and Business Park (48.5 ha net)

Issue raised	Council response	Action
Recommend that the Vale of Glamorgan Council acknowledge the importance of Bro Tathan for Hazel Dormouse, Skylark and Great Crested Newts	Comments noted. All future development proposals will need to safeguard any protected species.	N/A
<p>The anticipated increase in jobs of over 5,000 is overstated, given modern technology and AI.</p> <p>Failed to deliver the jobs promised.</p> <p>There is no public transport access direct from St Athan to a number of the listed places.</p>	<p>The RLDP indicates that the employment land provision identified within the plan has the capacity to provide up to 5,338 jobs and has been calculated using the Welsh Government Planning Practice Guidance Note 'Building an Economic Development Evidence Base to Support a Local Development Plan' The number of jobs identified is based on the land requirement over the plan period, however the availability of land within the Vale is greater than the requirement - and has the capacity to deliver up to 13,978 jobs.</p> <p>The concern about public transport is noted. However, Bro Tathan will help to support the business case for a new station at St Athan, which was subject to a UK Government announcement in March 2024 that funding would be available for the development of a business case for the station.</p>	N/A

<p>Increase land provision allocated within the RLDP at Bro Tathan to take account of available land of approximately 12 ha.</p> <p>The plan should also consider the following extant planning permissions:</p> <p>37,500 sqm of further Class B1/B2/B8 floorspace in the Western Zone</p> <p>987 sqm of further Class B1/B2/B8 floorspace at the Southern Zone</p>	<p>The RLDP allocates 48.5ha of employment land at Bro Tathan East. This area of land was identified by the Council's appointed consultants following discussions with the Welsh Government as part of the evidence gathering for the RLDP Employment Land Study (2022).</p> <p>Paragraph 5.9 of the ELS sets out the extent of the available land within Bro Tathan that was identified through these discussions, which reflects the land identified within the RLDP. The area of land relates to undeveloped area associated with Bro Tathan and as such does not include and approved planning permissions. It is noted that the areas with extant planning permission fall within the wider Bro Tathan Enterprise Zone.</p> <p>The Council shall clarify the land boundary with the WG as part of the Deposit Plan and amend accordingly.</p>	<p>Clarify the land boundary with the WG as part of the Deposit Plan and amend accordingly.</p>
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#### SP13.4 Land to the South of Junction 34, Hensol (29.59 ha net)

Issue raised	Council response	Action
Support the retention of Hensol site (Land at J.34, M4, Hensol).	Support is welcomed.	N/A
South of Junction 34 of the M4 - reduce this allocation as the land includes a network of SINC's which include wet woodland which is an uncommon habitat in the Vale	The allocated site reflects the existing planning approval 2019/01421/RES. The approved planning application includes areas of open space for ecological mitigation/protection following consultation with Natural Resource Wales.	N/A
What public transport & green transport initiatives are planned to mitigate the impact on the transport network.	A Travel Plan was submitted as part of the 2019 reserved matters planning application. This includes a target of 25% of trips in shared cars. Additional measures are also included to appoint a travel plan co-ordinator, promote	N/A

	cycling, remote working and the use of the new bus service required to be provided by the Section 106 agreement before the implementation of future phases.	
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### SP13.9 Former Aberthaw Power Station

Issue raised	Council response	Action
Renewable energy and regeneration of existing Aberthaw Power Station is welcomed if the national grid is upgraded to take more input from solar production.	Comments are noted.	N/A
<p>The site is at risk of flooding.</p> <p>CCR have no plan - restoration of a nature-compatible river estuary is proposed by conservation groups. The RLDP should say this proposal should be explored and set nature-recovery as aim for the ash-mound and biodiversity area.</p> <p>Difficult to comment on as plans are not available and as the ground will take years to clear due to contamination, the employment prospects are limited.</p>	A masterplan is currently being prepared for the former Aberthaw Power Station – these matters will be explored as part of this work.	N/A

### SP13.10 No.2 Port, Barry Docks

Issue raised	Council response	Action
<p>The Vale should not assume that any of the possible schemes will come forward.</p> <p>Concern raised to the potential for over-development and the lack of quality and meaningful green spaces for the new residents. We would like to see an Eco-Park within Barry Docks, like that proposed for Aberthaw that conserves and enhances the biodiversity found there.</p>	<p>The identification of Barry Dock Port No.2 as an Employment Regeneration Area reflects ABPs long term strategy for Barry, Cardiff, Newport and Swansea Docks, as set out in ABP strategy Future Ports: Wales.</p> <p>Associated British Ports are currently preparing a masterplan for No.2 Port which relates to the operational port land – no residential development is proposed within this area. Master planning of the No.2 Port will be required to take ensure existing biodiversity interests are protected and enhanced.</p>	N/A
<p>The identification of the Port as an Employment Regeneration Area is welcomed.</p> <p>ABP look forward to further engagement with the Council as the site evaluation process enters its next phase.</p>	Comments noted and support is welcomed	N/A
Amend supporting text to provide sufficient flexibility in the future regeneration of Port at Barry Docks	Comments noted – amend supporting text to provide flexibility.	Amend paragraph 6.151 to read: 'The Port of Barry



		<p>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.'</p>
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## SP14: Sustainable Tourism

Issue raised	Council response	Action
<p>The RLDP does not promote tourism.</p>	<p>Policy SP14: Sustainable Tourism clearly states that proposals which promote the Vale of Glamorgan as a destination for sustainable tourism will be favoured. The policy sets out how development proposals should contribute to the positive image of the Vale as an attractive and sustainable tourist destination by for example protecting and enhancing tourism attractions, providing a variety of tourism opportunities, particularly through all year-round facilities and a range of appropriately located visitor accommodation.</p>	
<p>Explicitly encourage tourist visits by sustainable transport.</p> <p>There are now very limited buses to the Island, will the metro see longer trains for summer days, weekends and holidays. What plans are there to implement a proper park and ride?</p>	<p>The comment is noted, and it is considered appropriate to incorporate in a revision to the policy.</p> <p>TFW have committed to introducing additional services at peak times and they will also be introducing new trains to the line with increased capacity.</p>	<p>Include reference to encouraging tourism visits to be made by sustainable transport</p>
<p>Over development of St Athan will detract from local tourism as the rural Vale further disappears due to additional housing.</p>	<p>It is not considered that new development in St Athan or any other locations would impact on the ability for the sustainable tourism policy to be delivered.</p>	
<p>Focus on Glamorgan Heritage Coast, Whitmore Bay, Barry Island and Penarth.</p> <p>Insist that any accommodation sites, e.g. new caravan sites are suitably placed for tourists to easily</p>	<p>Noted. Policy SP14 identifies under section E that development proposals should contribute to the positive image of the Vale as an attractive and sustainable tourist destination by providing a variety of tourism opportunities, particularly through all year-round facilities and a range of appropriately located visitor accommodation. Further detail on the Sustainable Tourism policy will be published as part of the Deposit RLDP.</p>	

<p>access destination sites via public transport already in use to prevent excess traffic to the island or Penarth where there is limited parking.</p> <p>Would welcome measures that allow local residents to better support facilities out of season, for the economy.</p>		
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## SP15 Climate Change

### Support

Issue raised	Council response	Action
Support the Policy and its implications.	Support is welcomed.	

### Object

Issue raised	Council response	Action
<p>Flooding is an issue in the Vale of Glamorgan and new development needs to respond to this.</p> <p>The loss of green space will exacerbate flooding.</p> <p>Developers made no space for drainage.</p> <p>The implications of new development for surrounding localities should be considered as part of development and included within this policy.</p> <p>Paragraph 6.164 implies flooding is focused in rural areas. It goes on to identify that development may be acceptable in TAN15 Defended Zones and it is advised that this is amended to advise that flooding is</p>	<p>Through the candidate site assessment process development has been directed away from locations identified within floodzones.</p> <p>Developers are required to provide sustainable drainage systems on sites. This requirement means that there can be no negative impacts in terms of drainage from new developments. In some cases, significant portions of sites are allocated to the provision of sustainable drainage systems and their associated infrastructure. The provision of sustainable drainage systems on site would limit the impact of drainage off site as surface water would be dealt with within the development boundary.</p> <p>The supporting text is considered to be balanced in its description of the spatial distribution of flood risk in the Vale of Glamorgan. The Council will consider amending paragraph 6.164 to include an indication that flooding would still be a consideration in Defended Zones and that development may be unacceptable in these areas too.</p> <p>There is merit in rewording paragraph 6.159 to be explicit in identifying that in the first instance flood risk should be avoided.</p> <p>The Council will review the wording in relation to Barry Docks.</p>	<p>Reword paragraph 6.159 as follows:</p> <p>This would include locating development away from areas of flood risk and considering overheating.</p> <p>Include the following in paragraph 6.164 with regards to Defended Zones:</p>

<p>still a material consideration whether in a defended zone or not.</p> <p>Paragraph 6.159 refers to flood resilience, however, the primary aim should be to avoid areas of flood risk.</p> <p>The Deposit Plan should clarify that only parts of Barry Docks are subject to flooding constraints</p>		<p>It should be noted that development in Defended Zones would need to comply with national planning policy, flooding remains a material consideration in these areas, and development is not automatically considered acceptable by virtue of being sited within a Defended Zone.</p> <p>Review the wording of paragraph 6.164 in respect of Barry Docks.</p>
<p>Planning doesn't require renewable energy provision.</p>	<p>The provision of renewable energy and energy efficiency of buildings generally is normally associated with Building Regulations. Notwithstanding this, the Council are currently considering the feasibility of including</p>	<p>N/A</p>

<p>A policy for conversion rather than demolition is required.</p> <p>Cardiff and Bridgend are making heat networks, but the Vale has done nothing despite Future Wales identifying Barry as a priority area.</p>	<p>requirements to make buildings net-zero within the RLDP, as implied in paragraph 6.161.</p> <p>Criterion B of Policy SP15 seeks whole life carbon assessments to prioritise conversion over reuse.</p> <p>Criterion G promotes the principle of district heat networks. However, this is as far as the Plan would be able to go in itself, in terms of supporting the principle of one. However, feasibility work for a heat network was included in the Renewable Energy Assessment in order to evidence that this is being considered. However, the final progression of one is not fully within the remit of the RLDP and it would rely on a range of stakeholders.</p>	
<p>Criterion K should be reworded as follows: 'redirect development away from areas identified as being at risk of flooding and/or coastal erosion and ensure that new development suitably controls surface water run-off through the use of sustainable drainage systems and nature-based solutions.'</p>	<p>The suggestion is noted. The Council will consider either amalgamating criterion K and criterion L, which cover these two issues or making no further changes.</p>	<p>Consideration will be given to wording changes.</p>
<p>The criteria are too prescriptive and may limit development proposals coming forward. There should be guidance on how this applies to all applications as responses would vary depending on the scale of development.</p>	<p>The Deposit Plan will expand upon this policy and include further guidance on how compliance should be achieved. If required SPG may also be progressed.</p>	<p>N/A</p>

**Comment**

Buildings and roads increase the heat of surrounding areas.	The urban heat effect implications of development are noted within the RLDP and criterion I of Policy SP15 and H of Policy SP18 Green Infrastructure respond to this directly. Notwithstanding this, whilst built development will result in higher temperatures due to more absorption when compared to green infrastructure, it is not considered that the scale of development proposed would result in urban heat island effects on existing communities, as experienced in cities.	N/A
We need farmland, trees and nature not less	The RLDP needs to balance the identified additional need for housing against the negatives of their development, including the loss of biodiversity. The RLDP is considered to be strong in ensuring that green infrastructure provision is integral in new developments, as set out in Policy SP18 Green Infrastructure.	N/A
There is a responsibility to get this right	The Council agrees with this, and it is acknowledged.	N/A
References to flooding are welcomed. Stage 2 SFCAs should take place on sites being progressed in the Plan and Stage 3s would be required if sites are being allocated that are at risk of flooding.	Comments are noted.	Ensure sites that are being allocated have progressed through a Stage 2 SFCA, and where necessary Stage 3 SFCAs are conducted.
Consider the inclusion of the following supporting text 'Rather than aiming for an even distribution or placing of trees at the periphery of a development, trees should be strategically sited to cast shade	The comment is noted. Consideration will be given to this suggested policy amendment.	Consider inclusion of suggested text either in this Policy or an

<p>where it will be required and should be integrated into the development's statutory Sustainable Drainage System (SuDS) to maximise tree health, improve effectiveness of SuDS and to improve the efficiency of land use.'</p>		<p>associated policy.</p>
<p>Policy SP15 is incorrectly referenced as SP14 in places.</p>	<p>This is noted and will be amended accordingly.</p>	<p>Amend the policy to ensure it is numbered correctly.</p>



## SP16 Sustainable Waste management

Issue raised	Council response	Action
<p>Insufficient infrastructure for waste management - this needs to be rectified before new developments progress.</p>	<p>The concern is noted. The planning department will liaise with waste colleagues in respect of proposals in the RLDP to ensure they are aware of the timescale for new development to allow them to plan accordingly. The Council has a duty to collect waste from households and any additional demand from an increase in households will need to be met, together with any required increase in wider facilities such as civic amenity sites.</p>	<p>Provide details of timelines of waste management infrastructure and development to show appropriate strategy is placed to match the additional demand from developments.</p>
<p>Amendment to SP16 - Open-air sustainable waste management facilities need not to be restricted to operational mineral working sites, as some non-operational mineral working sites will be suitable for waste management facilities.</p>	<p>Comments noted. Open air sustainable waste management facilities are appropriate on Class B2 and B8 industrial sites, operational mineral working sites, derelict land or buildings or within adjoining existing farm complexes where neighbouring land does not conflict with the uses. It is considered that there may be non-operational mineral working sites that could also be suitable, provided there is no conflict with adjoining uses and on that basis, a broader definition may be more appropriate.</p>	<p>Consider a policy amendment to allow allocation of open-air sustainable waste management facilities to be broader.</p>

**SP17 Sustainable Provision of Minerals**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Support for the policy.	Support is welcomed	N/A
<p>The plan should place greater weight on the significance of reserves in the Vale.</p> <p>There is a need for development management policies which safeguard mineral resources, existing and future extraction areas and associated infrastructure.</p>	Development management policies will be included within the Deposit Plan.	Include appropriate development management policies in the Deposit RLDP as per the adopted LDP.

<p>The policy seeks to combine minerals provision with minerals safeguarding and excludes some key national policy requirements such as buffer zones. It is recommended that the policy is split, to address these separate issues.</p> <p>Safeguarding sites or mineral reserve for potential continued use and reduce the potential conflict of use.</p> <p>It should be re-emphasised that the landbank is a minimum and not a maximum.</p> <p>Review minerals safeguarding to deliver national policy requirements and accord with the Council's own SPG and national guidance on Minerals Safeguarding, including details on prior extraction.</p> <p>Figures of existing landbank are seven years out of date.</p>	<p>The comments are acknowledged. The RLDP is a strategic policy that doesn't go into detailed policy implications. Within the Deposit plan policy will consider site-specific safeguards on identify sites with permitted reserves and be inclusive of defined buffer zones working to minimise potential conflicts between land uses. Policies will be reviewed as part of work on the Deposit Plan to ensure they adhere to national planning policy.</p> <p>The RLDP figures are based upon the 2020 RTS, which uses 2016 information, is the latest agreed document. Work has yet to commence on the 3rd review of the RTS but if further information is published in advance of the Deposit RLDP, we will take account of it. The Cardiff Sub Region – SSRC Position Statement July 2022 also utilises this 2016 data.</p>	<p>Prepare a Minerals Background Paper to support the Deposit RLDP.</p> <p>Review the suite of strategic and development management minerals policies to ensure they accord with national planning policy.</p>
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## SP18 Green infrastructure

Issue raised	Council response	Action
<p>Supports the approach to control surface water runoff in the policy and the RLDP.</p> <p>Overall support for policy.</p>	<p>Support welcomed</p>	<p>N/A</p>
<p>No confidence in developers delivering green infrastructure.</p>	<p>Through recent changes to Chapter 6 of Planning Policy Wales as well as policy included within the RLDP there is considered to be a strong policy position in respect of green infrastructure, which will ensure that developers have to deliver on green infrastructure requirements. If the developers fail to comply with their obligations in pre-agreed timeline the council have the ability to take enforcement action.</p>	<p>N/A</p>
<p>Widen the policy to the areas surrounding green infrastructure designations and also where there is flood risk.</p>	<p>Through green infrastructure statements the scope of green infrastructure to be considered will be identified. This should consider how green infrastructure on site interacts with the green infrastructure surrounding it, particularly in relation to connectivity. Therefore, developments will consider the green infrastructure in their locality and net benefits would be provided using the step wise test. Depending on the green infrastructure present on site and the loss proposed this may result in off sites improvements, but this would be on a case-by-case basis.</p> <p>Policy relating to flooding is highlighted in policy SP15 Climate Change and Mitigation and Adaptation. This directly interrelates with SP18.</p>	<p>N/A</p>

<ul style="list-style-type: none"> <li>- What level of green infrastructure and open space provision would be regarded as acceptable?</li> <li>- How would you determine the role of local amenity spaces in new development ahead of occupation by residents?</li> <li>- Similarly what level of provision of allotments and orchards would be regarded as acceptable?</li> </ul>	<p>Detail on open space and how they are designed would come forward at applications stage. However, established standards exist for the extent of open space generally required.</p>	<p>N/A</p>
<p>Section F reads: 'Provide amenity open space, which fulfils a wide range of roles. We advise this is amended to read: 'Ensure the provision of new, or presence of, existing accessible natural green space according to the size distance criteria set out in the NRW Greenspace Toolkit, as recommended in TAN 16 (Sport Recreation and Open Space).'</p> <p>Section H reads: 'Promote urban cooling and shading, sustainable drainage systems, and allotments and community orchards.' We advise this is amended to read: 'Ensuring new development remains at a liveable temperature during predicted summer heatwaves through provision of large species of street trees to cast shade on south facing facades, roads and paths, and integrate</p>	<p>The suggested changes are noted. The Council will consider these further and update the policy as required ahead of Deposit Stage.</p>	<p>The Council will consider the suggested changes to policy wording and where necessary make amendments.</p>

<p>green infrastructure provision with the SuDS mandated by the 2010 Flood and Water Management Act.”</p> <p>We advise the addition of following Section G: ‘New development should provide adequate provision of community growing spaces including allotments and community orchards.’</p> <p>Section 6.187 of the policy could be misunderstood to imply that SuDS is an optional feature. We advise a separate paragraph is included to explain the all-new development over the qualifying size is subject to SuDS approval and that SuDS should be integrated with other green infrastructure features.</p>		
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**Policy SP19 Biodiversity and ecosystem Resilience**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>We support the strategic importance attributed in policy SP15 to ensuring the sustainable and efficient use of energy and resources such as water, maximising water efficiency and minimising adverse impacts on quality of water resource. The policy also highlights the importance of ensuring that new development suitably controls surface water run off by using SUDS and nature-based solutions which we support, developers are required to obtain SAB consent to ensure that surface water is disposed of in a sustainable manner and to ensure that it does not communicate with the public sewer network, thereby ensuring sewer capacity is utilised for foul-only flows from development sites. This message is further reiterated in policies SP18 and SP19 and is welcomed.</p>	<p>Support is welcomed.</p>	<p>N/A</p>
<p>The references to the resilience of ecosystems are not being adequately addressed. There has been further tightening of requirements in relations to trees and woodlands that the Strategy is</p>	<p>The Preferred Strategy contains strategic policies SP18 Green Infrastructure and SP19 Biodiversity and Ecosystem Resilience, both of which seek to maintain and enhance biodiversity and improve the resilience and connectivity of ecosystems.</p>	<p>N/A</p>

<p>not adequately addressing, and the Strategy is not meeting the requirements to enhance biodiversity rather than simply maintain it. This is evidenced by the potential loss of huge swathes of farmland at Model Farm and north Barry that the strategy is not giving sufficient litigation to.</p>		
<p>This is very important. You must evidence this in all of your plans and development proposals.</p>	<p>Support is welcomed.</p>	<p>N/A</p>
<p>Construction of houses on green land will negatively impact the environment, biodiversity and ecosystems.</p> <p>To quote Biodiversity in the Vale of Glamorgan will be protected, maintain and enhanced. How is this achieved when all the proposed sites are greenfield?</p> <p>VOG please read this section again and then re-consider your plan of destruction of green sites and the associated wildlife and biodiversity. Your plan is one big contradiction!</p>	<p>The Key Sites within the Preferred Strategy have been subject to a robust and detailed site assessment as part of the Candidate Site process which included consultation with external statutory agencies such as Natural Resources Wales. Full details of the assessment process are set out in the Candidate Site Assessment methodology background paper.</p> <p>In identifying sites to meet the required housing requirement, as set out in the assessment methodology, the Council has sought to ensure that sites are generally free from physical constraints such as land ownership, infrastructure, access, ground conditions, biodiversity, landscape, heritage, flood risk issues and pollution.</p> <p>Notwithstanding the above, as a rural authority with insufficient levels of available brownfield land, it is inevitable that in order to meet the assessed housing requirement, it will be necessary to accommodate additional growth through the expansion of existing settlements on greenfield land.</p>	<p>N/A</p>
<p>We support this policy.</p>	<p>Support is welcomed.</p>	<p>N/A</p>



<p>It would have helped to list the non-statutory designations here.</p> <p>Concern about the oversight in not mentioning Sites of Importance for Nature Conservation and the criteria that would be used to assess any proposed developments on or near a SINC. As the recent survey has demonstrated 6% have been lost in the last 14 years. We would like to see the policy in the current LDP (MG21) for SINC's reinstated.</p> <p>In view of the fact that at a national and local level we have declared a Nature Emergency and the need to meet the 30% target of land being managed for nature conservation we feel that the last sentence (on page 120), which deals with development affecting non-designated sites and wildlife corridors, should be deleted. We need to say that enough is enough and not give hope to further destruction of our natural heritage.</p> <p>Nature Recovery Action Plan: No reference has been made to the Nature Recovery Action Plan and how the policies presented here would support or work against the ambition of the Partnership as</p>	<p>The objection to including a list of non-statutory sites is noted. The Council has undertaken a review of the SINCs within the Vale of Glamorgan as background evidence to RLDP preparation which will be published alongside the Deposit Plan. As in the adopted Local Development Plan 2011-2026, the Deposit Plan will include a list of non-statutory designations as set out in the background paper.</p> <p>Strategic policy SP19 Biodiversity and Ecosystem Resilience requires that biodiversity in the Vale of Glamorgan is protected, maintained and enhanced and that new development must provide a net benefit for biodiversity and improve the connectivity and resilience of ecosystems. Criterion 'C' of the policy is clear that this requirement relates to both statutory and non-statutory designations.</p> <p>While the comments are noted, situations will always arise when the value of a development outweighs the nature conservation value of site. This is evidenced nationally by the IROPI assessment (Imperative Reasons of Overriding Public Interest) carried out under the Habitats Regulations 2017. In this regard, the Council considers that while the final paragraph of policy SP19 may enable some additional development, the other policy requirements of the RLDP and national planning policy will adequately protect non designated sites and ensure net-benefit.</p> <p>Council to include within the local policy context section reference to the Vale Nature Recovery Action Plan.</p>	<p>Include list of non-statutory designations as defined under PPW (Edition 12 February 2024) Figure 13: Designated Sites, within the draft Deposit Plan as an appendix.</p> <p>Council to consider the reuse of existing adopted LDP MG21 SINC policy in Deposit Plan.</p> <p>Include within the local policy context section and the explanatory text to policy SP19 reference to the Vale Nature Recovery Action Plan.</p>
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<p>demonstrated through the NRAP. The Vale NRAP is the responsibility of the partnership, and a great deal of time and effort has been expended in its development. We would not want to see any plan from any source working to weaken the need to address the biodiversity emergency and the programme of works in the NRAP.</p>		
<p>We note the sentence 'prioritising previously developed brownfield land for new development'; given that some brownfield land may hold examples of the Open Mosaic Habitats on Previously Developed Land (OMHoPDL), which is a Priority Habitat listed by the Welsh Government under Section 7 of the Environment (Wales) Act 2016, we recommend the inclusion of the following sentence:</p> <p>'all brownfield sites must be surveyed for the presence of species and habitats listed under Section 7 of the Environment (Wales) Act. Development will not be permitted where those species or habitats occur, or where the development would threaten the survival of those species or habitats.'</p>	<p>Planning Policy Wales (edition 12) (February 2024) (PPW) directs that wherever possible, previously developed land should, wherever possible, be used in preference to greenfield site. PPW is however clear that not all previously developed land is suitable for development. This may be, for example, because of its unsustainable location, the presence of protected species or valuable habitats or industrial heritage, or because it is highly contaminated. The comments of NRW in respect of Objective 5 are noted however, Objective 5 continues...<i>directing development away from areas of nature conservation interest and safeguarding the sensitive natural environment from inappropriate development</i>. It is therefore considered that the objective as written complies with both PPW and the requirements of the Environment (Wales) Act 2016. Preliminary Ecological Assessments for potential development sites (including those on brownfield land) will continue to be undertaken as and when required.</p>	<p>N/A</p>

<p>The RLDP needs policy to implement "nature recovery" The VoG duty under Section 6 (Environment Wales. Act). The vagueness and lack of policy on the 'nature emergency' is unacceptable in the light of the Future Wales policy that the need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right.</p>	<p>The Council has a duty under Section 6 of the Environment Act (Wales) to protect, maintain and enhance its biodiversity assets, reversing decline and establishing resilient ecological systems. This 'duty' has been an integral part of the development of the preferred strategy and will continue to be a fundamental consideration in the preparation of the draft Deposit Plan.</p> <p>The importance of the declared climate and nature emergencies is clearly acknowledged in the Preferred Strategy (paras 2.47 and 2.80 refer). The need to reverse biodiversity decline and ensure net benefit is also enshrined in Objective 5 - Protecting and Enhancing the Natural Environment, and paragraph 5.5 identifies key policy issues that should be included in any strategy adopted for the RLDP and includes 'Responding to the nature emergency through biodiversity net benefit.'</p> <p>The requirement to achieve biodiversity net benefit and to respond to the climate and nature emergencies is also a key tenet of strategic policies SP18 Green Infrastructure and SP19 Biodiversity and Ecosystem Resilience.</p>	<p>N/A</p>
<p>Support the VOG's policy to protect, maintain and enhance biodiversity and ecosystem resilience.</p>	<p>Support is welcomed.</p>	<p>N/A</p>

## Introduction, Policy Context, Key Characteristics, Key Themes, Vision and Objectives

### Introduction

Issue raised	Council response	Action
Typographical error at Paragraph 1.1.	Noted. The typographical error will be amended.	Para 1.1 to read “All Local Authorities in Wales are required to produce a Local Development Plan (LDP) to manage of 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.”
Background Evidence produce by the Council is never independent.	In preparing the RLDP the Council has appointed consultants to undertake several background studies. These have been undertaken independently and consequently so are the findings and recommendations made within the reports. The Council also points out the RLDP and supporting evidence shall be subject to public examination by an independently appointed planning inspector.	N/A

## Policy Context

### National Policy Context

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The Wellbeing Act must underpin all decisions.	Noted. In preparing the RLDP consideration has been given to ensuring that the plan is complimentary to and assists in delivering the Wellbeing Goals and five ways of working. Further detail can be found in BP2 Issues, Vision and Objectives and BP4 Assessment of the Preferred Strategy against the Tests of Soundness.	N/A
Historic Environment Wales Act (2016) shall be replaced in due course by the Historic Environment Wales Act (2023).	Noted. The Council shall ensure that the legislative and policy context for the RLDP will be kept under review and updated as and when necessary.	Update if the Historic Environment Wales Act comes into force prior to the publication of the Deposit Plan.
Clarify the definition of 'spatial' within the context of the plan.	Noted. The Council will consider the need to include a glossary of terms within the Deposit Plan.	Consider inclusion of a glossary of terms
The whole section is unachievable.	The section sets out the policy context for the plan and legislative requirements to be considered.	N/A
Technical Advice Notes - Include Mineral Technical Advice Notes (MTAN 1) Aggregates.	Noted. Include MTAN 1 and associated requirements in relation to LDPs.	Include MTAN 1 and associated requirements in relation to LDPs.
Welsh Marine Act - Concern about EU and Government involvement in fishing.	Noted.	N/A
Include a reference to the COP 15 30x30 Global Challenge.	Noted. The Council will include reference to the 30 x 30 Challenge which aims to protect and effectively managing at least 30% of our land freshwater and sea for nature by 2030.	Include reference to the 30 x 30 Challenge

## **Regional Policy Context**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Regional Technical Statement for Aggregates: Support for the inclusion.	Support is welcomed.	N/A
<p>Support for BP20 Joint Position Statement with Cardiff.</p> <p>The Preferred Strategy does not fully consider the relationship with Cardiff, Bridgend or RCT.</p> <p>Further evidence is required to demonstrate how the Preferred Strategy has been developed within the wider regional context.</p> <p>BP20 Joint Position Statement identifies high level of commuting between Cardiff and the Vale.</p> <p>Both Cardiff and the Vale are not being aspirational enough in terms of housing which will increase migration between other LA areas.</p>	<p>The support for the Joint Position Statement with Cardiff is welcomed. The Vale and Cardiff have a strong relationship, particularly from an employment/commuting and population/housing perspective, as discussed in detail within the paper.</p> <p>BP8 Demographic Evidence (prepared by Edge Analytics) considers the relationship with the other neighbouring authorities of RCT and Bridgend. This indicates that net migration between the Vale and RCT/Bridgend has been consistently low over recent years and commuting flows between the areas are much lower than the flows to Cardiff. Notwithstanding this, the Council regularly engages with RCT and Bridgend as well as the other LAs within the Cardiff Capital Region.</p> <p>The Cardiff Capital Region LAs have recently commissioned work to consider regional growth in population and employment. The findings of this report, which also considers migration and commuting, will form part of the evidence base for the Deposit Plan and will address the concerns raised. Liaison will continue with the Vale's neighbouring authorities, and it is anticipated that further joint position statements will be prepared where appropriate.</p>	<p>Regional growth report to form part of evidence base.</p> <p>Prepare joint statements with RCT and Bridgend to support Deposit Plan.</p>
Regional Collaboration: Strategic Development Plans should be in place before Local Development Plans are produced.	A Strategic Development Plan (SDP) will be prepared for the Cardiff Capital Region area. However, there is also a requirement for LAs to keep their LDPs up to date. The adopted LDP will expire at the end of 2026, and it is therefore essential that a replacement is prepared to ensure there is continued plan coverage, rather than wait for an SDP, which will likely take significantly longer. Subsequent RLDPs will be prepared in accordance with any SDPs in place at the time.	N/A
Regional Collaboration: Why are there no proposals to build homes in the	The distribution of housing growth is explained within the spatial options and growth section of the RLDP Preferred Strategy.	N/A

western Vale close to Bridgend where there is employment.		
South Wales Metro: Will improvements include 24hr public transport service to Cardiff Airport?	This is not a matter that the RLDP can address.	N/A

### **Local Policy Context**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Project Zero- Net-zero is unachievable and unlawful and public money should be spent elsewhere	The Council has declared a climate emergency, and the Climate Change Challenge Plan is the Council's response to this. Climate change is a key consideration in the preparation of the RLDP.	N/A
These plans should be scrapped money spent on education and better NHS	The Council will seek to ensure additional demand for education arising from new housing growth will be secured as part of new development. The Council is working closely with the Cardiff and Vale University Health Board (CAVUHB) to explore opportunities for enhancing local health services, however the delivery and funding of services is ultimately the responsibility of the CAVUHB and Welsh Government.	N/A
Vale of Glamorgan Transport Plan- It would be nice to know what the plans are and how unreliable bus services will be held accountable.	<p>It is not the purpose of the RLDP to manage bus services or hold providers to account. The RLDP will compliment work being carried out elsewhere in relation to the provision of sustainable transport, including bus services.</p> <p>The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with Transport for Wales (TfW) in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme.</p> <p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.</p>	N/A
Shoreline Management Plans (SMP). Consideration should be given to the	Noted. The Council will, as part of the Deposit RLDP, consider SMP and review relevant area policies.	Council to consider SMP area policies

relevant SMP policies in your locality to inform the RLDP. The SMP policies should be considered alongside information on the risk of flooding or coastal erosion, including TAN 15 Defended Zones.		and their relevance to the Deposit RLDP.
Local Policy Context- Include a reference to Regional Partnership Board's Joint Area Plan (JAP) 2023-2028.	Noted. The Council will review and include relevant elements of the Regional Partnership Board's Joint Area Plan (JAP) 2023-2028 within the local policy section.	Review and include relevant elements of the Regional Partnership Board's Joint Area Plan (JAP) 2023-2028 within the local policy section.
Local Policy Context- Include reference to the Vale achieving World Health Organisation Age Friendly status within relevant sections of the plan and policies.	Noted. The Council will consider including references to the World Health Organisation Age Friendly status within the RLDP where appropriate.	Including references to the World Health Organisation Age Friendly status within the RLDP.
Local Policy Context- Include reference to the Vale Nature Recovery Action Plan	Noted. The Council will include within the local policy context section reference to the Vale Nature Recovery Action Plan.	Include within the local policy context section reference to the Vale Nature Recovery Action Plan.



## The Vale of Glamorgan Key Characteristics

### General Comments

Issue raised	Council response	Action
<p>Disagree with Key Characteristics</p> <p>The key characteristics are unrealistic, and it is impossible to realise all of them. They need to be reconsidered and simplified. Only the most pressing needs should be seriously considered.</p> <p>Not enough thought gone into it. They do not represent the rapid changes that residents are facing in the rural Vale- loss of green spaces and joining up of settlements such as Rhose, St Athan, Llantwit and Cowbridge- changing the character of rural villages in-between them.</p>	<p>The Council considers that key characteristics portray a true reflection of the key issues within the Authority which the RLDP will seek to address, having had regard to the engagement sessions carried out. This section includes information from a range of sources.</p>	<p>N/A</p>
<p>Support for the key characteristics.</p> <p>Many characteristics accurately portrayed and acknowledges the rural context of the Vale of Glamorgan.</p> <p>Agree that the key characteristics are reflected in the Preferred Strategy.</p> <p>Agree that these are key characteristics and with the fact that the VoG has declared a climate emergency and aims to meet the 2030 zero carbon goal.</p>	<p>Support is welcomed.</p>	<p>N/A</p>

### **The Vale of Glamorgan Key Characteristics - Settlement Pattern**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Paragraph 3.6 further clarity should be included about rail connectivity to the Western Vale. There are currently no firm commitments by Transport for Wales (TFW) about increasing the frequency of trains to Bridgend, from Barry and through Rhoose, Llantwit.	Section 3.6 highlights that future rail service improvements to the frequency of rail services along the Vale of Glamorgan are anticipated as part of Metro Rail improvements. In April 2024, there was an announcement that the increase to two trains an hour during the daytime will be delayed indefinitely, but that two additional peak services will be introduced from 2026. Paragraph 3.6 will need to be amended accordingly.	Amend paragraph 3.6 to reflect current position on increased frequency.
Section 3.6 refers to excellent rail connections to Cardiff and Bridgend. This is presently limited to a one-hour service from Bridgend to Cardiff. There are inadequate bus services in the Western Vale including St Athan	<p>The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with Transport for Wales (TfW) in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme. TfW have committed to introducing additional services at peak times, they will also be introducing new trains to the Line with increased capacity, and the April 2024 announcement is not considered to fundamentally undermine the Preferred Strategy.</p> <p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.</p> <p>In March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train station and St Athan, also identified within the Preferred Strategy.</p>	N/A
Disagree with the statement at paragraph 3.8 that Cowbridge and Penarth 'play similar strategic roles'. There are few transport facilities in the	Para 3.8 states that while the settlements of Cowbridge, Penarth and Llantwit Major are different in character to each other in terms of their size and locations, they are considered to play similar strategic roles. This statement does not imply that they share equal levels of services and	N/A

case of Cowbridge and western vale is heavily reliant on car usage.	facilities, but within the wider context they play similar roles that support wider areas.	
Disagree with para 3.9. 3.9 is overly positive about the key services available in primary settlements. You state that there are key services in place without stating what key services are absent.  Paragraph 3.10 - You are not stating what services are absent from rural settlements but only stating vaguely that some are.  Limited insight into the key characteristics of the Vale, as the description is too generalised and does not reflect the important differences between different parts of the Vale.	The facilities and services within settlements range widely between each settlement and therefore it would be impractical to list each within the RLDP. The Council has undertaken an assessment of services and facilities within each settlement of the Vale of Glamorgan and this is set out in the Council's Settlement Appraisal Review Background Paper which accompanied the Preferred Strategy.	N/A
Rural village characteristics of Dinas Powys must be protected	In delivering growth the RLDP will seek to ensure that new development will respect the character of settlements within which they are located. In this regard the Preferred Strategy contains several policies in relation to placemaking, the environment and landscape.	N/A
Paragraph 3.7 does not highlight that Barry Waterfront is largely unfinished and significant issues Ffordd y Milleniwm and retail units unfinished and remaining empty.	Comments noted. Work is ongoing at Barry Waterfront, and it is anticipated that Barry Waterfront will be completed in the early years of the RLDP.	N/A
Agree that Llantwit Major is identified as a Service Centre.	Support is welcomed.	N/A
Agree with identification of Barry as the Key Settlement	Support is welcomed.	N/A

Agree with the identification of Wenvoe as a Primary Settlement		
Clarify wording of para 3.3 - "Barry, the largest town, is the administrative... 45,300 people are distributed amongst the larger towns of ..".	Para 3.3 indicates that the population of Barry is 56,600 people in 2021. A further 45,300 live in Penarth, Llantwit Major, Dinas Powys and Cowbridge. The Council considers that para 3.3 clearly explains the population of Barry and that of other towns in the Vale.	N/A
Dinas Powys is not a larger town and the point in 3.3 is misleading to compare it to other towns across the Vale as there is limited employment opportunities	Comment Noted. Amend para 3.3 to refer to larger towns <b>and villages</b> , recognising that Dinas Powys is one of the larger villages within the Vale of Glamorgan	Amend para 3.3 to refer to larger towns and villages
Paragraph 3.9 states that St Athan offers several key services and facilities, but these are very limited and lacking for the needs of the local community resulting in many people having to travel to Llantwit Major or Barry for essential services	The Council will explore opportunities to enhance services and facilities within St Athan as part of the master planning of key sites, identified within the Preferred Strategy; further details will be set out in the Deposit Plan.	N/A
Agree with the identification of Llandough as a Primary Settlement	Support is welcomed.	N/A
Agree that these are key characteristics and with the fact that the VoG has declared a climate emergency and aims to meet the 2030 zero carbon goal.	Support is welcomed.	N/A

### **The Vale of Glamorgan Key Characteristics – Population and Demography**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Population in the Vale has increased and there is need for housing.	Agreed. New housing is necessary not only to meet the increase in population but due to projected smaller household sizes.	N/A

<p>If migration is from Cardiff to the Vale, this might suggest commuters travelling back to Cardiff for work. The plan may be justifying an even greater need for commuting to/from Cardiff.</p>	<p>The Preferred Strategy seeks to deliver a level of housing growth that aligns with jobs growth to reduce the need to travel outside of the Vale. It is acknowledged that there is currently a net out-commute from the Vale to Cardiff for employment and the RLDP will not be able to reverse this trend. However, the Plan focuses new development in locations that are well served by sustainable transport, providing the opportunity for people to travel to work using sustainable methods, in line with the Transport Hierarchy.</p>	<p>N/A</p>
<p>Census 2021 shows an increase in the over 65 population but not the under 65 population.</p> <p>The evidence suggests that the working population will not materially increase and that there is an outflow of young people who may not return.</p> <p>Younger people are leaving the Vale.</p> <p>There are significant socio-economic challenges associated with an ageing population which the RLDP needs to address. A range and choice of houses is therefore required.</p> <p>The ageing population will have an impact on the needs for housing, transport, key services such as health and social care, and employment.</p>	<p>The latest population projections (WG 2018 based) indicate that over the plan period the greatest population growth will be in the 65+ population, which is a trend that reflects demographic patterns elsewhere in the UK. The WG projections also project a modest increase in the working age population, but decline over the projection period in the number of children, linked to declining birth rates.</p> <p>The level of growth that the RLDP should accommodate is a policy matter and therefore the Preferred Growth option in the RLDP is at a level that is modelled to stabilise the working age and school age population, helping to support economic growth and help achieve balanced sustainable communities.</p> <p>It is anticipated that there will be some outflow of younger people leaving the Vale for educational opportunities. However, the RLDP has a role in encouraging them to return by offering sustainable communities for them to live in with homes and job opportunities.</p> <p>It is recognised that the ageing population will impact on services. This was an issue raised in the HIA workshop (see BP3) and through engagement with the Older Persons Forum. The Preferred Strategy includes Policy SP8 on Affordable and Specialist Housing in response to this. Placemaking is an integral part of the plan and locating development in sustainable locations with a mix of uses and housing options will assist with the challenges older people face. There are some elements that are outside the remit of the RLDP such as the delivery of health and social care, but the Council will</p>	

	continue to work with partners through the RLDP to consider the land use elements of any requirements for older people.	
<p>Whilst the long-term trends are important to note, it might be helpful to include more of the data from the census for the most recent information on population change. The number of people aged 65 and over in the Vale of Glamorgan increased by 24.9% between 2011 and 2021, compared with 17.7% in Wales as a whole. The number of people in the 65-74 age group increased by 26.4% (3,300 people), whilst the number aged 35-49 years decreased by 7% (1,800 people).</p> <p>Paragraph 3.14 refers to figure 7 about migration for the years 2016-2021, but the years 2019-2021 are not shown in the graph.</p>	Noted.	<p>Include further commentary on population changes between the 2011 and 2021 Censuses.</p> <p>Review Figure 7 to include the most recent data on net migration to ensure it accords with Paragraph 3.14.</p>
<p>Section 3.15 admits that there has been a steady population inflow from Cardiff but makes no reference to jobs in the Vale. There is no direct correlation between increased population and jobs created, which have been static over the last five years.</p>	<p>Section 3.15 is included under the sub-heading Population and Demography. Employment is discussed under a later subsection.</p> <p>The relationship between jobs and population is discussed in Chapter 5 of the plan, which summarise the findings of the demographic evidence and employment land study (see BP7, BP8 and BP12). It is noted that jobs growth has been low in the previous 5 years, which was an unprecedented time due to Brexit and Covid. However, a wider evidence base is considered when determining a realistic level of jobs growth in the plan period, which also considers past take up rates and labour demand forecasts.</p>	
<p>The implications of the age of Dinas Powys' population needs to be considered.</p>	<p>The age profile of Dinas Powys is broadly in line with the average age profile of the Vale of Glamorgan as a whole. As such, the challenges faced, such as an ageing population, are not unique to Dinas Powys, but will be considered accordingly.</p>	N/A

## Housing Market and Housing Need

Issue raised	Council response	Action
<p>Young people are being priced out of the Vale so there is a need for lower cost homes as well as social housing</p> <p>In St Athan there are already sufficient affordable homes for local needs, together with other low-cost housing</p>	<p>The Vale of Glamorgan RLDP highlights that there are high levels of affordable housing need within the Vale of Glamorgan. The areas of acute need are within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhoose, Wenvoe and St Athan, although there are a significant number of people on the waiting list across all areas of the Vale, as evidenced within the Council's Draft Local Housing Market Assessment (2023). There is need for both social and intermediate housing products.</p>	<p>N/A</p>
<p>The PS should plan to meet the full need of affordable housing identified.</p> <p>We agree that the Vale has a significant need for affordable homes.</p>	<p>It is recognised that the RLDP cannot address the full extent of the identified affordable housing need, but it will seek to maximise its delivery through the policies of the Plan, including key allocations and through securing on site affordable housing and promoting opportunities for 100% affordable housing.</p> <p>Over the lifetime of the RLDP, the 2023 Local Housing Market Assessment identified a need for 7,643 affordable homes.. Presently, the Preferred Strategy has calculated that existing housing sites within the land bank supply will have the capacity to deliver some 2,000 affordable dwellings. This figure will be amended to take account of the affordable housing contributions that will be provided on Key Housing Sites identified within the Preferred Strategy, following detailed site viability appraisals.. It is also anticipated that additional affordable homes will be identified on small scale affordable led housing schemes, as supported by the RLDP Preferred Strategy.</p>	<p>N/A</p>
<p>There are significant socio-economic challenges associated with an ageing population which the RLDP needs to address.</p>	<p>The RLDP acknowledges the need to support the delivery of housing of older people, encouraging new developments to provide for a range of house types and securing specialist affordable accommodation as detailed within Strategic Policy SP 8 Affordable and Specialist Housing.</p>	<p>N/A</p>

There is inadequate detail about the levels of homelessness and provision of services for asylum seekers in the Vale	Noted. The Council will consider including relevant information on the levels of homelessness and provision of services for asylum seekers in the Vale.	Include relevant information on the levels of homelessness and provision of services for asylum seekers in the Vale
Why build more homes only to give them to immigrants, self-imposed homelessness etc	The allocation of affordable housing is undertaken in line with the Council's housing allocation policy	N/A

### **The Vale of Glamorgan Key Characteristics: Health and Well-being**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Amend following paragraphs:</p> <p>3.23 - should reflect on both life expectancy, and healthy life expectancy (ie the number of years lived in good health) as these are both indicators of health inequalities between the least and most deprived areas.</p> <p>3.24 – suggest adding reference to access to public transport as well as active travel</p> <p>3.34 - 2021 data on commuter work patterns is available on the ONS website. need to add statement on modal split – the fact that most of these journeys is by road (not the distance being travelled) is why</p>	Noted- amend paragraphs as suggested	Amend paragraphs as suggested



<p>congestion is high at peak periods; shifting more of these to rail or bus would reduce impact on road congestion significantly.</p> <p>3.43 – should stipulate here that supermarkets should be located in the town centres, rather than out of town necessitating additional unnecessary travel and hollowing out of town centres 3.53 – suggest ‘people with additional access needs, such as disabled people, some older people etc.’ as older people may prefer single storey dwellings for example but not necessarily be formally classed as disabled.</p>		
<p>There is no assessment or the consideration for emergency housing and refuge support for instances such as domestic abuse and violence, nor foster homes.</p>	<p>Comments Noted. However, these are issues that are beyond the remit of the RLDP and are principally the responsibility of other Council departments.</p>	<p>N/A</p>
<p>Addressing inequalities must include improving public transport.</p>	<p>The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with Transport for Wales (TfW) in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme.</p> <p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services.</p>	<p>N/A</p>

**The Vale of Glamorgan Key Characteristics: Education**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The section does not set out specific needs or locations or the problem of 'bussing' children around the rural Vale	The Council is preparing an assessment of education provision which shall identify the additional education places required to support the housing growth identified within the RLDP. The consideration of these issues at an early stage will help to ensure supply and demand are more closely aligned, assisting pupils to attend schools closer to their homes if they so choose. However, the nature of the rural Vale means that there is insufficient school age population to support a school in every settlement so some children will need to continue to travel by bus. Further detail on any additional requirements will be set out in the Deposit Plan.	Publish Education Background Paper alongside Deposit Plan.

### **The Vale of Glamorgan Key Characteristics: Connectivity**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Disagree that the Vale has excellent rail connections</p> <p>Poor transport connections and lack of investment in services, and urgent need for investment.</p> <p>Congestion is only mentioned once and is not specific.</p> <p>Public transport difficult for older generation/ less mobile.</p>	<p>The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with Transport for Wales in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme.</p> <p>It is recognised that bus services have been subject to funding cuts in recent years and the future funding position remains uncertain. However, the Council will continue to liaise with bus operators in respect of the delivery of their services. New development in an area will increase the population base of potential bus users, which can help their sustainability.</p> <p>Stage 1 of Strategic Transport Assessment (BP14) was published alongside the Preferred Strategy and considered baseline highway operations and sustainable transport. Stage 2 of the Strategic Transport Assessment, which will consider the cumulative impact on new development on the transport network, will be published alongside the Deposit Plan.</p>	<p>Consider the findings of Stage 2 of the Strategic Transport Assessment and publish alongside the Deposit Plan.</p>

Priority should be given to the need to reduce use of private cars and decrease the number of car journeys.	The key characteristics section is factual in nature explaining connectivity by all modes of transport. The Preferred Strategy in its subsequent Vision, Objectives and Policies does prioritise reducing the need to travel and sustainable travel as an integral part.	N/A
The Council continues to mention and support preserving a strip of land to build a link to the airport but there is no plans for TfW to provide a rail link to the airport.	There is no reference to an airport rail link in the Preferred Strategy.	N/A
Cardiff Airport needs a better road link direct to the M4	Previous proposals for a road link between the M4 and the A48 have been considered but in accordance with Cabinet decision C536 the scheme was not progressed. The proposal would not accord with the Wales Transport Strategy and would have implications for the climate change agenda.	N/A
Cardiff Airport - No mention is made about public ownership or public financial subsidy or the limited connectivity to other parts of the UK.	This is not a matter that the RLDP can address.	N/A
Support for active travel- but lacks an overall vision for how the Vale can be linked by alternatives to the car	Support is welcomed. The Council has a programme of active travel routes within the which aims to improve active travel connectivity, as set out in the local Active Travel Network Map. The Preferred Strategy also seeks to maximise opportunities for promoting active travel.	N/A
Section 3.27 refers to the Vale railway line linking up the Vale's largest settlements. No mention is made of St Athan.	Paragraph 3.27 notes the settlements served currently by train services and currently there is no station at St Athan. In March 2024 the Department of Transport announced funding for further feasibility for the reintroduction of a new train station at St Athan. Further detail on this shall be provided at the Deposit Plan stage.	N/A
The Preferred Strategy clearly recognises how well connected the Vale of Glamorgan is - this connectivity should be supported and enhanced as much as possible to help deliver wider benefits to the area.	The comment is noted. The Strategy seeks to focus development in locations with the best connectivity to sustainable transport nodes.	N/A

### **The Vale of Glamorgan Key Characteristics: Economy & Employment**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Insufficient detail about the residual implications of the Covid-19 on work patterns.</p> <p>Home working now decreasing.</p> <p>Very few businesses have moved into the already created enterprise zones.</p> <p>No correlation between increased population and jobs - many employees come from outside the Vale.</p>	<p>This section of the Preferred Strategy provides contextual information on the key characteristics of the Vale, and utilises a range of statistical evidence, including homeworking, employment structure and commuting patterns.</p> <p>The key background employment evidence for the RLDP is contained within the Council's Employment Land Study March 2023. The findings of this study have informed the employment land allocations and policies of the RLDP. This work has drawn on economic and employment statistics as well as detailed market assessment on the employment market within the Vale and wider South East Wales region.</p>	N/A

### **The Vale of Glamorgan Key Characteristics: Retail**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Consideration of the need for a supermarket is St Athan given the additional housing proposed in the RLDP.</p>	<p>The Council will consider the provision and location of new retail provision as part of the Deposit Plan proposals. This may also include the provision of mixed uses on key housing sites.</p>	<p>Further consideration of the mix of uses in St Athan to be undertaken prior to Deposit Plan.</p>
<p>This section ignores the number of empty shops in Holton Rd.</p>	<p>The retail policies of the plan will also seek to encourage a diversity of uses within existing retail centres to encourage the take up of empty premises and to improve the attractiveness of centres such as Barry, where there may be higher vacancy rates.</p>	N/A

### **The Vale of Glamorgan Key Characteristics: Tourism**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Concern regarding level of congestion at tourist destinations such as Cosmeston Lake	The RLDP plan-period will coincide with the implementation of the South Wales Metro. The Council will continue to engage with Transport for Wales in respect of improvements to rail services within the Vale of Glamorgan as part of the Metro delivery programme. There will also be engagement with bus operators around their services. Improvements to transport connectivity will encourage more visitors travel to the Vale by sustainable means.	N/A

### **The Vale of Glamorgan Key Characteristics: Natural Environment**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Green wedges – the Preferred Strategy was produced without any corresponding plan or methodology for Green Wedges being concluded.	An assessment of existing green wedges shall be undertaken as part of the Deposit Plan preparations. This shall be undertaken in accordance with the agreed regional methodology for the designation of green wedges.	Prepare green wedge review to support Deposit Plan.
Paragraph 3.49 does not mention what the outcome for the Model Farm site would be if the Minister rejects the planning appeal.	This matter shall be addressed following the determination of the planning appeal.	N/A
There is no reference to land use in the Vale and the importance of agriculture and the rural economy. Agriculture accounts for 84% of the land area	Noted. The extent of agricultural land present in the Vale is contained within paragraph 3.1.  Information on agricultural employment is provided within the employment land supply review, however, the Council will amend the plan to highlight economic value of agriculture within the Vale of Glamorgan.	Amend the plan at section 3.35 to highlight economic value of agriculture within the Vale.

**The Vale of Glamorgan Key Characteristics: Natural Environment Language, Culture, Heritage, and Diversity**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Ensure that built heritage and natural heritage are treated equally.  Listed buildings must be protected.	The Council is committed to protecting its heritage assets throughout the Vale of Glamorgan. Built and natural heritage is a key component of placemaking, and it is vital that such elements are protected and where appropriate enhanced.	N/A
Notable absence of consideration for the accommodation needs, community cohesion and integration and proximity of services of asylum seekers and refugees.	These are matters which are largely outside the influence of the RLDP.	N/A

**The Vale of Glamorgan Key Characteristics: Climate Change and Flood Risk**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Concerns over flood risk in areas where development is proposed that are susceptible to flooding.  There is little work on modelling the impact and risk presented by the accelerated impact of climate change	In preparing the Preferred Strategy the Council has undertaken a Stage 1 Strategic Flood Consequence Assessment to identify areas at potentially high risk from flooding as well as providing details of historical flood events and any details of any flood risk management structures or procedures present.  Detailed flood risk assessments shall also be required for sites identified with the RLDP to ensure appropriate mitigation measures and infrastructure is provided to avoid any flood risks identified.	N/A
Not sure that climate change will have a significant impact on coastal areas in the period up to 2036.	Flood risk is an issue associated with coastal areas, rivers, and surface water from developed and undeveloped land alike. Whilst coastal flooding may not have a significant impact on coastal areas during the plan period the Council, through the plan, must ensure steps are taken to mitigate future impacts associated with climate change that may occur beyond the lifetime of the Plan.	

<p>Stop Welsh Water polluting rivers and waterways, dredge the riverbeds to allow water somewhere to go, stop building on flood plains and wetlands</p>	<p>These are matters which are largely outside the influence of the RLDP.</p> <p>New allocations will be developed in accordance with national policy on flooding, which restricts highly vulnerable development on areas at risk of flooding.</p>	<p>N/A</p>
<p>You state there is a declared climate emergency. Who has stated this and with what scientific evidence?</p>	<p>The Welsh Government declared a 'climate emergency' in April 2019. In February 2020 the Council signed a Climate Emergency Charter.</p>	<p>N/A</p>

## RLDP Vision

### Support

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Agree with the Vision	Support is welcomed	N/A
Support for vision as it strives for growth	Support is welcomed	N/A
Welcomes the Vision's recognition that the allocated employment sites can make a significant contribution to reducing the currently high levels of outward commuting (primarily to Cardiff).	Support is welcomed	N/A
Support for the Local Authority's target to becoming zero carbon by 2030, focusing on housing growth and the delivery of affordable housing, Support for providing green infrastructure and biodiversity benefit.	Support is welcomed	N/A
Support for the RLDP's Vision in recognising that growth in rural settlements is required to support balanced multigenerational communities and to contribute to vibrancy.	Support is welcomed	N/A



The general Vision is supported, and the topics which underpin this truly reflect the aspirations for the growth of the VoG.	Support is welcomed	N/A
The vision is aspirational and covers a wide range of topic areas, setting out with clarity what the LDP is aiming to achieve.	Support is welcomed	N/A
Support of the vision's recognition of the role of Bro Tathan and Cardiff Airport	Support is welcomed	N/A
Support for the Vision, noting that Dinas Powys plays a significant part in the strategy.	Support is welcomed	N/A

### **Objections and Comments**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Need to consider the need for smaller properties for older persons to downsize.	Comments noted- The RLDP recognises the importance of ensuring new housing developments meet the needs of all sectors of society. In this regard Policy SP3 Placemaking, and Policy SP8 Affordable and Specialist Housing of the require new housing developments to provide for a range of housing types. Additionally, Policy SP7 Health and Wellbeing that "all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs". Compliance with this would include enabling opportunities for downsizing and adaptation of properties.	N/A
Vision is idyllic, laudable but unlikely to be achieved based on the situation as at 2024. Quality of life in the Vale is deteriorating  Vision has been put in place by people who likely do not live in the vale or understand rural life.	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 elements within the Vison are derived from the key issues and challenges that exist within the Vale and reflects the unique and diverse character of the Vale of Glamorgan's towns and villages. The Vision sets out what the RLDP will mean for these areas over the lifetime of the Plan. In this	N/A

<p>Expectation that society will suddenly be walking, cycling, or using public transport will never happen in the real world.</p> <p>The vision is too long.</p> <p>There is little detail in this plan regarding solutions to current major problems.</p> <p>The aims are unrealistic and unlikely to be achieved. Air pollution - particularly from traffic and the planes taking off/landing at a nearby airport - is already damaging. Not supported with any information on how they might be achieved either in this section or in the strategy.</p>	<p>respect the Council considers the Vision to be locally distinctive to the Vale of Glamorgan, as opposed to adopting a generic vision that could be applicable to anywhere.</p> <p>The Council acknowledges that it will be a challenge to meet all aspects of the Vision during the plan period, but the Council has deliberately set the bar high. Notwithstanding this, the Vision has been carried through into the Key Objectives and Strategy, and the strategic policies provide a clear statement as to how future development within the Vale of Glamorgan will be expected to contribute to meeting the Vision.</p> <p>Moreover, the RLDP Vision also reflects the Council's wider corporate priorities as well as those of the Public Service Board: the need to address the challenges of climate change, the provision of affordable housing and the health and wellbeing of its residents. In this respect, the Council is of the view that the delivery of the Vision will be undertaken through partnership working.</p>	
<p>Reducing road danger, investing in public transport and safe, convenient active travel routes whilst making use of private cars less attractive is key.</p>	<p>Comment noted. These aspects are addressed within the Vision, Objectives and policies of the RLDP.</p>	<p>N/A</p>
<p>Application of the Vision is questioned as the northern part of the LA and to an extent the western area, are largely unaffected by the RLDP.</p> <p>The long-term vision of the Strategy only relates to the development of the eastern and southern areas of the Vale.</p>	<p>The level and distribution of housing growth in the plan is set out in the Spatial Strategy of the Plan, influenced by the acknowledgement that in light of the Climate Emergency there is a pressing need reduce private car usage. The RLDP will achieve this by ensuring future housing growth is located with settlements that offer greatest opportunities for residents to travel by public transport, consistent with the Vision.</p> <p>Notwithstanding this, the Vision also acknowledges the need to support rural communities and address affordable housing need. In this respect, the RLDP Strategy provides for additional small scale affordable housing led</p>	<p>N/A</p>

It is considered that the Vision is entirely undermined by the allocations set out by the RLDP	growth within the higher order of settlements identified within the Settlement Hierarchy set out in Policy SP2.	
There is a large focus and bias in the emerging plan on the proximity of Cardiff and Airport. There is no evidence to suggest that a large proportion of residents in the Vale (a) use the airport or (b) have employment or job opportunities here which they travel for.	Cardiff Airport provides a key infrastructure role regionally and is a key employer within the Vale of Glamorgan. This is reflected within the Vision.	N/A
We object to the unqualified aim of reducing outward commuting for many in the eastern Vale the only employment options are in Cardiff.  The aims of reducing outward commuting are unfeasible given the limited employment options within the Vale of Glamorgan	The RLDP seeks to reduce outward commuting by providing opportunities for residents to live and work in the Vale, it does not seek to completely stop outward commuting.	N/A
Disagree due to lack of infrastructure to support vision e.g. schools, health facilities, public transport, and new roads	Full details of the infrastructure requirements of the RLDP will be provided at the Deposit Plan Stage. The assessment of the additional infrastructure to support the identified housing growth is currently being prepared, this includes education, active travel, public transport and health facilities.	N/A
Questions whether the Council's net zero will be achieved by 2030	Both the Council and the Senedd have declared 'climate emergencies', thereby recognising that there is a major issue that needs to be addressed, and that will impact on the formulation of public policy across several areas. In this regard, the Council's Project Zero sets out an ambitious programme of how it will meet its net zero target by 2030- this aspiration is reflected within the RLDP Vision, Objectives, and policies.	N/A
The Vision needs to explicitly consider how the Vale can be an inclusive place for everyone.	Policy SP6 Creating Healthy and Inclusive Spaces and Places, sets out how the RLDP will require new developments to be inclusive.	N/A
Vision is not supported by evidence – no firm evidence of demand for a	The Vision is forward looking, identifying the place that the Vale should be by 2036. The inclusion of the Green Energy Park at Aberthaw reflects the	N/A

<p>Green Energy Park at Aberthaw or its delivery within the lifetime of the plan.</p> <p>Many items rely on partners to deliver rather than being under the control of the Council.</p> <p>Vision fails to recognise Welsh challenges such as the performance of the NHS, transport failings, financial challenges, the ageing population, climate change and sewerage capacity.</p>	<p>commitment from Cardiff Capital Region (CCR) to redevelop the site, with funding established for this purpose. The redevelopment of the site forms a key part of CCR's strategy to decarbonise the region up to 2035, and a Masterplan which considers realistic uses is being prepared.</p> <p>The Council will continue to work closely with partners around the delivery of common objectives. However, there are challenges that are outside of the remit of the planning system, and it is important to recognise that the RLDP cannot deal with every challenge facing Wales.</p>	
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### **Suggested Changes to Vision**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Amend vision to Reference the 30x30 global challenge on Biological Diversity at COP 15 in December 2022.</p> <p>Vision must include the Welsh Government's commitment to allocating 30% of land for nature by 2030.</p>	<p>References to biodiversity protection and enhancement are contained within the Vision. As such, it is considered that the inclusion of reference to 30X30 Global Challenge is not required. Instead, as set out above this will inform the context of the RLDP.</p>	<p>N/A</p>
<p>Where reference is made to the use of 'planting' to provide carbon storage, this is replaced with 'nature-based solutions'</p>	<p>Noted. Amend wording of Vision.</p>	<p>Amend wording to read: Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced</p>

		connectivity and planting <b>providing nature-based solutions</b> and contributing towards Climate Change resilience and adaptation.
Add reference to 'causes of ill-health have been reduced', as this would cover issues such as air and noise pollution.	Noted. Amend wording of Vision.	Amend wording to read: Positive improvements have been achieved in narrowing the disparities in the quality of life <b>and causes of ill health have been reduced</b> for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
Suggest for 'culture and diversity of people' rather than 'protected', which could be interpreted as protectionism of existing communities and a lack of welcoming new diversity, suggest 'championed' instead.	Noted. Amend wording of Vision.	Amend wording to read: The Vale continues to be a place where the culture and diversity of people, and the unique

		qualities of its communities, are recognised and <b>championed</b>
Table at 4.1 and the wording at 4.4 also include commitments to Community Safety. The only reference to safety within the Vision is where under placemaking is says “Through placemaking, places and spaces are safe”	Noted. Reword Table 4.1 to include reference to safety.  In respect of the Vision, it is considered that community safety is adequately addressed within the current wording.	Table 4.1 Placemaking - amend to read: Facilitate the development of adaptable, <b>safe</b> , accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure.
We broadly support the Vision, subject to the following changes, shown in CAPITALS: Growth within at rural settlements has provided for the HOUSING, EMPLOYMENT AND OTHER needs of residents and	It is considered that the types of growth cited are implicitly referred to through other elements of the Vision.	N/A
There is no mention of reducing overall private car use	Noted. Reword Vision to reference the reduction in private car usage.	Amend Vision to read: The delivery of the South East Wales Metro means that the Vale of Glamorgan is now well connected by an

		integrated transport system supporting economic growth <b>resulting in a reduction in private car usage</b> ...
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## Key Themes

### Key Theme: Mitigating and Adapting to Climate Change

Issue raised	Council response	Action
<p>Support - It is good to see mitigating climate change and enhancing the natural environment and promoting active and sustainable travel included as Key Themes.</p>	<p>Support is welcomed and comments noted.</p>	<p>N/A</p>
<p>Climate change is a scam.</p> <p>If climate change is a priority, then I expect there to be no further housing or industry built on flood plains or in areas that are vulnerable to future flood risk.</p> <p>Mitigating and Adapting to Climate Change - Brownfield sites were removed as the first sites for development. Climate Change has not been considered in this plan.</p>	<p>Both the Council and the Senedd have declared 'climate emergencies', thereby recognising that there is a major issue that needs to be addressed, and that will impact on the formulation of public policy across several areas. In this regard the Council's Project Zero sets out an ambitious programme that set out it will meet its net zero target by 2030 - this aspiration is reflected within the RLDP Vision, Objectives, and policies.</p> <p>The Adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land, such as that at Barry Waterfront.</p> <p>The Strategy indicates 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 therefore need to be released. Notwithstanding this, it is anticipated that a level of windfall housing growth will inevitably come forward over the plan period on brownfield sites, and this has been accounted for within the land supply calculations of the RLDP. Such development would be supported in accordance with national planning policy and is reflected in Objective 5 of the RLDP.</p> <p>All new development is required to have an appropriate drainage system that is based upon Sustainable Drainage System (SuDS) principles and prioritises natural drainage methods rather than artificial ones. Any drainage system for a development requires SuDS Approval Body (SAB) approval before development can commence. The SAB will typically seek to ensure that the surface water run-off from a site will be less than it was as an</p>	<p>N/A</p>



	undeveloped site and will ensure that the development will not worsen flood risk to adjoining land.	
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**Key Theme: Improving Mental and Physical Health and Well-being**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The health and well-being theme could be broadened to be about reducing the causes of ill-health, as well as creating environments that enable healthy lifestyles, and about providing access to healthcare services and activities.</p> <p>Suggested wording: 'Improve the health and well-being of our residents by fostering active, healthy communities for living, learning working and visiting; reducing causes of ill-health; and reducing health and socio-economic inequalities in a sustainable way'. Improving mental and physical health and well-being – suggest adding in 'learning' in description as otherwise focuses more on adults rather than children</p>	<p>Comments noted. Amend wording of Key Theme Health and Wellbeing to read: 'Improve the health and well-being of our residents by fostering active, healthy communities for living, learning, working and visiting; reducing causes of ill-health; and reducing health and socio-economic inequalities in a sustainable way'</p>	<p>Amend wording of Key Theme Health and Wellbeing to read: 'Improve the health and well-being of our residents by fostering active, healthy communities for living, learning, working and visiting; reducing causes of ill-health; and reducing health and socio-economic inequalities in a sustainable way'</p>

**Key Theme: Placemaking**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Support, in principle, for the placemaking theme	Support is welcomed and comments noted	NA

<p>Placemaking – needs reference to 'well-connected' being by sustainable transport; and is 'adequate' infrastructure a reasonable requirement or should it be 'high quality, appropriate' infrastructure</p>	<p>Comments noted. However, defining high quality is subjective. Notwithstanding this, Council proposes to amend the wording of Key Theme Placemaking to read: Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities, and are equipped with <b>appropriate</b> supporting infrastructure.</p>	<p>Amend the wording of Key Theme Placemaking to read: “Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities, and are equipped with appropriate supporting infrastructure.”</p>
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**Key Theme: Protecting and Enhancing the Natural Environment**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>We would urge you to delete the phrase 'to strive to' in achieving biodiversity net benefits.</p>	<p>Comments noted- Amend wording of Key Theme Protecting and Enhancing the Natural Environment to read: Protect and enhance the quality, connectivity and resilience of the Vale's natural environment and green / blue infrastructure network and maximise opportunities to <b>strive to</b> achieve net biodiversity benefit. Natural resources, minerals and waste must be sustainably managed in the Vale of Glamorgan to achieve resource efficiency, including the utilisation and generation of renewable energy.</p>	<p>Protect and enhance the quality, connectivity and resilience of the Vale's natural environment and green / blue infrastructure network and maximise opportunities to achieve net</p>

		biodiversity benefit. Natural resources, minerals and waste must be sustainably managed in the Vale of Glamorgan to achieve resource efficiency, including the utilisation and generation of renewable energy.
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**Key Theme: Homes for All**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The 'Homes for All' Key Theme should also refer to there being sufficient supply to address negative socio-economic trends currently apparent in the Vale of Glamorgan—for example, general affordability issues and an ageing population	Comments noted. It is considered that theme as worded acknowledges the need to ensure the RLDP makes provision for adequate supply of land. However, it would benefit acknowledging the housing challenges of an ageing population. Accordingly, it is recommended to amend the wording of Key Theme Homes for All to read: “Housing supply needs to be able to respond to the authority’s growing population but must also be appropriate in terms of type, tenure, and location. In addition, there must be an adequate provision of affordable, older persons and specialist housing to cater to those in need.”	Amend the wording of Key Theme Homes for All to read: “Housing supply needs to be able to respond to the authority’s growing population but must also be appropriate in terms of type, tenure, and location. In addition, there must be an adequate provision of affordable, older persons and

		specialist housing to cater to those in need.”
Support for the theme for homes for all and the need for the housing supply to respond to the growing population and	Support is welcomed and comments noted.	N/A
Consider the need for smaller properties to enable older persons to downsize such as bungalows, and plan for needs of the older generations within the community.	Comments noted. The RLDP acknowledges the need to support the delivery of housing of older people, encourage new housing developments that provide for a range of house types and secure specialist affordable accommodation as detailed within Strategic Policy SP 8 Affordable and Specialist Housing.	N/A

**Key Theme: Fostering Diverse, Vibrant, and Connected Communities**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Diverse connected communities. The last thing commuter estates promote is cohesive communities, Existing cohesive communities are, instead, inevitably destroyed	Placemaking principles, alongside master planning of key sites through community engagement, will ensure that the development of key sites will contribute towards delivering wider community benefits.	NA
The chosen themes do not adequately reflect the importance and place of Community Safety within the planning landscape for the intended 15 years.	Comments noted – Amend wording of Key Theme Key Theme: Fostering Diverse, Vibrant, and Connected Communities to: Fostering Diverse, Vibrant, <b>Safe</b> and Connected Communities Foster the development of well-connected, <b>safe, and</b> cohesive communities and ensure all engagement processes are as inclusive as possible, allowing everyone that wishes to share their views throughout the RLDP process to do so.	Amend wording of Key Theme Key Theme as follows: Key Fostering Diverse, Vibrant, Safe and Connected Communities Foster the development of well-connected, safe, and cohesive communities and

		ensure all engagement processes are as inclusive as possible, allowing everyone that wishes to share their views throughout the RLDP process to do so.
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**Key Theme: Promoting Active and Sustainable Travel Choices**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The proposed developments are NOT realistically accessible other than by car.	The RLDP Strategy proposes growth within areas served by public transport, with the key sites located within reasonable proximity to existing train stations. The strategy has identified a potential new train station at St Athan. All development proposals will be required to contribute towards the provision of active travel and sustainable transport infrastructure.	N/A
Proposed Change: to re-word the Travel Theme so that reducing the need to travel becomes the priority before switching modes.	Comments noted. The current wording of the Key Themes is appropriate as it seeks to <u>simultaneously</u> reduce the need to travel and encourage journeys to be undertaken sustainably. It does not prioritise either outcome.	N/A
Support the theme of promoting active travel and sustainable transport choices.	Support is welcomed and comments noted.	N/A
Promoting active and sustainable travel choices could be reframed as 'Creating and promoting ....' as there is a need to continue to develop more active travel modes and connect communities through cycle routes and public transport options.	Comments noted. Amend wording of Key Theme Promoting Active and Sustainable Travel Choices to read: "Creating and promoting the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel"	Amend wording of Key Theme Promoting Active and Sustainable Travel Choices to read:

		“Creating and promoting the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel”
Promoting active and sustainable travel choices – suggest 'the use of sustainable methods of travel by default'.	Comment noted. However, the Council consider the suggested wording to be unnecessary.	N/A

**Key Theme: Building a Prosperous and Green Economy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
While we all agree jobs should be brought to the Vale, why the emphasis on so called green jobs? Once again, your primary emphasis is on climate change. This is another "soft focus" view of some Utopian future which will either never happen or will take decades to achieve.	The reference to green jobs reflects the proposed creation of a green energy park at the former Aberthaw Power station and zero carbon employment proposals at Barry Docks. Details of these proposals are outlined within the RLDP.	N/A
We specifically agree with the "Building a Prosperous and Green Economy" Theme	Support is welcomed and comments noted	N/A

### **Key Themes – General Comments**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Agree broadly with the themes,  It will be the detail that matters.	Support is welcomed and comments noted.	NA
Agree, however proposals in the RLDP work against these - e.g. improving mental and physical health and well-being and active travel	Support is welcomed and comments noted.	N/A
Agree that the nine themes appropriately cover the issues to be addressed - particular attention should be given to ensuring that the location of housing supply provides sufficient choice in the area.	Support is welcomed and comments noted.	N/A
Disagree with the themes. The Key Themes are a wish list.	The Key Themes have been identified through the assessment of relevant information specific to the Vale of Glamorgan. The Council considers the themes to reflect the key characteristics of the Vale and the issues present within the authority, as set out in section 3 of the RLDP Preferred Strategy.	N/A
This appears to be a quite old-fashioned Plan. Planning needs now to include more than just Buildings and location. The impact on lifestyle should also be considered.	Comments noted.	N/A
Are the key themes in order of priority?	No, the themes are not in priority order.	
It is not considered that these themes have been appropriately addressed within and reflected by the content of the Plan. In respect of	The RLDP supports appropriate growth within rural settlements where this is in keeping with the character of the settlement, its position in the RLDP Settlement Hierarchy and the services and facilities available within the settlement itself.	

<p>Placemaking, Promoting Active Travel and Homes for All the strategy does not meet these themes. Additional growth in minor rural settlements would assist in delivering these themes.</p>		
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## RLDP Objectives

### RLDP Objectives: Objective 1- Mitigating and Adapting to Climate Change

Issue raised	Council response	Action
Proposals can only have a net negative effect increasing congestion, noise air pollution and flooding	The RLDP Strategy seeks to mitigate the impact of future planned growth through concentrating this growth within settlements that offer good public transport connectivity. The Plan also contains a number of policies aimed at ensuring future growth incorporates active travel and green infrastructure, that homes are built to high sustainability credentials, and ensure that appropriate measure are taken to reduce and mitigate the risk of flooding.	N/A
This objective should exist more broadly, not just in relation to new developments.	Comment noted. Whilst the Objective is related to development proposals that would come forward in the lifetime of the RLDP, there are national, regional and local strategies that seek to improve climate resilience of existing infrastructure, the built and natural environment. Examples of this in the Vale of Glamorgan are the Council's Project Zero and Biodiversity Action Plan.	N/A
The 'climate emergency' is a convenient excuse to fail to deliver key infrastructure.	Both the Council and the Senedd have declared 'climate emergencies', thereby recognising that there is a major issue that needs to be addressed, and that will impact on the formulation of public policy across several areas. In this regard, the Council's Project Zero sets out an ambitious programme that sets out it will meet its net zero target by 2030 - this aspiration is reflected within the RLDP Vision, Objectives, and policies.	N/A
<p>If climate change is the priority that it should be, then green field sites should not be destroyed for development.</p> <p>Developments are being proposed on green wedge and agricultural land without brownfield consideration, which directly impacts biodiversity and the future of food production</p>	<p>The Adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land, such as that at Barry Waterfront.</p> <p>The Strategy indicates that there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth for the within the Vale of Glamorgan over the plan period and accepts that greenfield land will therefore need to be released.</p> <p>Notwithstanding this it is anticipated that a level of windfall housing growth shall come forward over the plan period on brownfield sites, and this has been accounted for within the land supply calculations of the RLDP. Such development would be supported in accordance with national planning policy and is reflected in Objective 5 of the RLDP.</p>	N/A

<p>Access to active travel is poor encouraging car usage.</p>	<p>The RLDP promotes active travel. Where new development is proposed it will require these developments to make provision for active travel, and wherever possible connect with the routes identified in the Council's Active Travel Network Map. .</p>	<p>N/A</p>
<p>The commitment by the Welsh Government to allocate 30% of land for nature in Wales by 2030 must have more prevalence throughout the plan.</p>	<p>Noted. The RLDP contains policies that promotes biodiversity net benefit, which is consistent with the Welsh Government commitments.</p>	<p>N/A</p>
<p>We welcome and support this Objective and note the reduction in car travel and encouragement of active travel to reduce emission and improve air quality.</p> <p>We advise the incorporation of the following text to ensure the objective is more robust; 'Direct development away from areas identified as being at risk of flooding and/or coastal erosion'.</p>	<p>Support is welcomed.</p> <p>Noted. amend Objective 1 as worded: Ensure that all new development and infrastructure is resilient to future impacts arising from Climate Change.  <b>Direct development away from areas identified as being at risk of flooding and/or coastal erosion.</b></p>	<p>Amend Objective 1 as worded:  Ensure that all new development and infrastructure is resilient to future impacts arising from Climate Change. <b>Direct development away from areas identified as being at risk of flooding and/or coastal erosion.</b></p>
<p>Support the Council's objective to mitigate and adapt to climate change.</p>	<p>Support is noted and welcomed.</p>	<p>N/A</p>
<p>We support Objective 1. The objective needs to be expanded to recognise that new development cannot be considered in isolation and its impact on existing premises and land is equally important. New development must also be required to demonstrate that it will not</p>	<p>Support is noted and welcomed. All new development is required to have an appropriate drainage system that is based upon Sustainable Drainage System (SuDS) principles and prioritises natural drainage methods rather than artificial ones. Any drainage system for a development will need to receive SuDS Approval Body (SAB) approval before development can commence. The SAB will typically seek to ensure that the surface water runoff from a site will be less than it was as an undeveloped site and will ensure that the development will not worsen flood risk on adjoining land.</p>	<p>N/A</p>

adversely impact on existing development or increase the risk of flooding elsewhere.		
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**Objective 2: Improving Mental and Physical Health and Well-being**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Loss of green spaces impact of construction on wellbeing. Contradictory as much of the RLDP focuses on building on greenfield sites.	<p>The Strategy indicates that there is not sufficient viable and deliverable brownfield land to accommodate all the proposed growth for the within the Vale of Glamorgan over the plan period and accepts that greenfield land will also therefore need to be released, in order to ensure that the RLDP is consistent with Future Wales.</p> <p>The Council will ensure that all new development meets the RLDP wellbeing objectives which are supported through the plan with policies that will require wellbeing to fully considered as part of any development proposals. These will include incorporation of green infrastructure, open spaces, active travel and where identified, enhanced access to local health facilities. Additionally, the Council will be producing Supplementary Planning Guidance on health and wellbeing alongside the Deposit Plan which will provide further detail on measures which the Council will require new developments to incorporate.</p>	N/A
<p>Objective could be broadened, as creating healthy environments is more than having access to open spaces and active travel, it is about being able to connect with others, access healthy food, live in safe spaces.</p> <p>Access to necessary healthcare facilities could be extended to reflect the ambition being set out in the RPB's 10-year Strategic Capital</p>	Comments are noted. The Council considers that the current wording of the Objectives would enable proposals such as those suggested. Additionally, the issues relating to healthy food environments will be considered with future Supplementary Planning Guidance which will be published alongside the Deposit Plan.	Consider this issue as part of future SPG.

Plan, to develop integrated health and care facilities.  The issue of food sustainability should be included somewhere within the LDPs strategic policies, including increasing the provision for food growing, and measures to control the location and number of fast-food takeaways.		
It would be lovely to participate in active lifestyles, but the objectives do not go far enough to address this in every area of the Vale.	Comments noted. The RLDP promotes active travel. Where new development is proposed it will require these developments to make provision for active travel, and wherever possible connect with the routes identified in the Council's Active Travel Network Map.	N/A
We support this objective.	Support is noted and welcomed.	N/A

### **Objective 3: Homes for All**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Social housing brings problems to existing quiet areas containing a larger proportion of more mature residents. Previous new developments have resulted in increased nuisance (crime, noise, unruly children).	This is not fundamentally a matter for the RLDP, however, positive masterplanning and placemaking will seek to minimise such issues arising.	N/A
Support for the Objective- ensure that new housing is delivered in the most suitable locations within the settlement.	Support is welcomed. The RLDP strategy seeks to mitigate the impact of future planned growth through concentrating this growth within settlements that offer good public transport connectivity.	N/A
We broadly support this objective. Particularly the provision of high-	Support is welcomed.	N/A

quality housing which includes the right mix, tenure, and type.		
Objective 3 - Homes for All should be amended to make it clearer that the plan will support a need to provide enough homes to meet the identified need. The wording currently covers a range of housing issues but is not clear over the quantity needed.	Comment noted. The Council considers that the proposal to include the word “enough” within the objective is superfluous as the RLDP clearly sets out the level of housing growth that would be accommodated over the lifetime of the Plan.	N/A
Homes must reflect the local architecture and heritage of the Vale and provision must be made for adequate parking.	<p>Comment noted. The requirement for new developments to respect local architecture and heritage are considered within Policy SP5 Placemaking which requires that all new developments reflect local distinctiveness, character, and cultural identity.</p> <p>Parking requirements will be in accordance with the Council’s Parking Standards SPG.</p>	N/A
Brownfield sites must be a consideration.	<p>The Strategy indicates 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 therefore need to be released.</p> <p>Notwithstanding this is anticipated that a level of windfall housing growth shall come forward over the plan period on brownfield sites, and this has been accounted for within the land supply calculations of the RLDP. Such development would be supported in accordance with national planning policy and is reflected in Objective 5 of the RLDP.</p>	N/A
The need for more homes in Wales seems to focus on the Vale of Glamorgan.	All Local Authorities within Wales must plan for future population and household growth and publish a Local Development Plan for its area. The housing growth proposed in the Vale of Glamorgan RLDP shall cater for the future population change and household growth that shall occur within the Authority between 2021 and 2036.	N/A

<p>It is unclear how the RLDP will meet this objective, given that no allocations for further development are being included in the rural Vale.</p>	<p>The level and distribution of housing growth in the plan is set out in the Spatial Strategy of the Plan, influenced by the acknowledgement that in light of the Climate Emergency there is a pressing need for the plan to contribute towards reducing private car usage by ensure future housing growth is located with settlements that offer greatest opportunities for residents to travel by public transport, consistent with the Vision. Notwithstanding this, the Vision also acknowledges the need to support rural communities and address affordable housing need, and in this respect the RLDP Strategy provides for additional small scale affordable housing led growth within the higher order of settlements identified within the RLDP Settlement Hierarchy.</p>	<p>N/A</p>
<p>This objective is ideologically honourable but in reality, can't be achieved.</p> <p>For affordable homes higher densities will be required which will lower the standard of accommodation and place a strain on infrastructure.</p>	<p>Higher density development does not mean lower standard accommodation. Affordable homes must be built to WDQR standards, which set space and energy efficiency standards.</p>	

**Objective 4: Placemaking**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The RLDP needs to provide further guidance on how 'place' is defined.</p>	<p>Comments Noted. The Council shall consider the need for additional supplementary guidance in respect of Placemaking.</p>	<p>Consider need for further SPG.</p>
<p>Objective 4: this could take further the opportunity to blur the boundaries between infrastructure types and to seek opportunities for multi-purpose universal facilities e.g.</p>	<p>Comments noted. The co-location and provision of multi purposes community facilities is promoted with in the current Adopted LDP and shall be carried forward within the RLDP.</p>	<p>N/A</p>

<p>co-location of health facilities with leisure, recreation, education etc.</p>		
<p>St Athan and its residents has not been engaged in any "placemaking" in the development of this RLDP.</p> <p>This RLDP does not facilitate community infrastructure adequate for the increased requirements of thousands of new homes. Placemaking is an important objective, but the RLDP needs to provide further guidance on how 'place' will be defined. We note that the Council intend to prepare Placemaking Plans for the four towns within the Vale (Barry, Cowbridge, Penarth and Llantwit Major) but elsewhere how new development interacts with existing must be properly considered.</p>	<p>Comment noted. The Council shall be arranging community engagement sessions in respect of Key Sites proposed within the RLDP. This will provide communities the opportunity to engage in the placemaking process of both key sites and adjoining areas, which will inform master planning of sites.</p> <p>In addition, the Council is assessing infrastructure requirements associated with Key Sites, including any opportunities for improving access to services.</p>	<p>Ensure relevant communities are advised of when future key site engagement sessions will be undertaken.</p>
<p>Placemaking is an important objective, but the RLDP needs to provide further guidance on how 'place' will be defined. We note that the Council intend to prepare Placemaking Plans for the four towns within the Vale (Barry, Cowbridge, Penarth and Llantwit Major) but elsewhere how new development interacts with existing must be properly considered.</p>	<p>Comments are noted. The Design Commission for Wales has published a guide to Placemaking- reference to this guidance will be included within the Deposit Plan, and the Council will consider whether it would be appropriate to produce additional supplementary planning guidance.</p>	<p>Include reference to the Design Commission for Wales Place Making Guidance within the plan.</p>
<p>Changes at 'Objective 4 - Placemaking' might better reflect a commitment to Community Safety.</p>	<p>Comment noted. The Objective presently includes a reference to safety which would embrace community safety.</p>	<p>N/A</p>

Support for Objective 4, which seeks to ensure that all development will contribute positively toward creating a sense of place.	Support is noted and welcomed.	N/A
Should include that all new homes should be well insulated and include solar panels and/or heat pumps to reduce energy demands and costs for residents.	This is considered within Policy SP15	N/A

**Objective 5: Protecting and Enhancing the Natural Environment**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>It seems brown field sites have been put to one side for the easier "one size fits all" of "let's build massive housing estates on greenfield sites".</p> <p>Concerned that developing will be concentrated on "Brownfield" sites which often contain more biodiversity than "Green field" sites.</p> <p>Disagree – building next to SSSI's will not protect natural habitats nor help reduce emergencies (flooding and wider impact of water run-off from the sites proposed).</p>	<p>Brownfield land can support important and diverse habitats. Conversely greenfield land surrounding settlements is often comprised of improved agricultural grassland which has little importance for nature conservation or biodiversity. To assume a general presumption against development on greenfield land is incorrect.</p> <p>In assessing candidate sites submitted for consideration, the Council has been proactive in avoiding development on land of high biodiversity value, and mitigation measure will be required where sites adjoin or are near protected areas of land. Additionally, there is a legislative requirement for the RLDP to achieve biodiversity net benefit where development is proposed, and this is reflected within the wording of Objective 5.</p>	N/A
Suggest 'protect natural habitats' changed to 'protect existing natural habitats' as usually preferable to not destroy old-growth biodiversity to replace with new schemes, wherever possible.	Comment noted. The Council considers that the current wording of the Objective would address the concerns raised.	N/A



<p>We suggest the following amendments:</p> <p>“Protect and enhance the quality, connectivity and resilience of the Vale’s natural environment and green / blue infrastructure network and maximise opportunities to (DELETE strive to) achieve net biodiversity benefit. Natural resources, minerals and waste must be sustainably managed in the Vale of Glamorgan to achieve resource efficiency, including the utilisation and generation of renewable energy.</p>	<p>Comments Noted. Reword Objective 5 to read as worded.</p> <p>“Protect and enhance the quality, connectivity and resilience of the Vale’s natural environment and green / blue infrastructure network and maximise opportunities to achieve net biodiversity benefit. Natural resources, minerals and waste must be sustainably managed in the Vale of Glamorgan to achieve resource efficiency, including the utilisation and generation of renewable energy.</p>	<p>Reword Objective 5 to read as worded.</p> <p>“Protect and enhance the quality, connectivity and resilience of the Vale’s natural environment and green / blue infrastructure network and maximise opportunities to achieve net biodiversity benefit. Natural resources, minerals and waste must be sustainably managed in the Vale of Glamorgan to achieve resource efficiency, including the utilisation and generation of renewable energy.</p>
<p>Most semi natural habitats that would contribute to Net Biodiversity Benefit require ongoing management; this is often the most difficult element of delivering biodiversity enhancement.</p>	<p>Comments noted. The Council shall consider the rewording of the Objective as proposed- however it may be more appropriate to include the reference to management of natural habitats within relevant policy of the RLDP.</p>	<p>Reviewing suggested wording and incorporate within the objective or within appropriate section of the RLDP.</p>

We advise that this is explicitly mentioned within the Objective to ensure that site developers are fully aware at an early stage of the likely need for an ongoing management commitment.		
Support for Objective 5	Support is noted and welcomed.	N/A
<p>We welcome this Objective and the overall aim to achieve net biodiversity benefit.</p> <p>We also welcome the prioritisation of previously developed brownfield land for new development and safeguarding sensitive natural environment from inappropriate development. We welcome that the level of house building should not be at the expense of environmental protection.</p>	Support is noted and welcomed.	N/A

### **Objective 6: Embracing Culture and Heritage**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>This objective is totally at odds with the proposals.</p> <p>I cannot see how the current type of housing development conserves or enhances the historic assets. All new developments look similar.</p>	National planning policy places a requirement on planning authorities to protect the historic environment, placing a presumption against development which could damage the character, setting and appearance of listed buildings and conservation areas. This is reflected in the vision, objectives and policies contained within the RLDP. Additionally, in assessing candidate sites the Council has ensured that the built environment would be protected by discounted any sites that were deemed to have a negative impact on the historic built environment.	N/A
Objective 6 should incorporate the words 'WHERE POSSIBLE' in	The amendment to the wording as suggested would be contrary to national planning policy which places a strong presumption against development	N/A

relation to conserving and enhancing historic assets. This would give flexibility for there to be some harm to heritage assets.	which could damage the character and appearance of listed buildings and conservation areas.	
We support this objective.  Support- The Preferred Strategy recognises the value and qualities of the Vale's built heritage and historic assets, via placemaking embedded in the planning process (Objective 6: Embracing Culture and Heritage).	Support is noted and welcomed	N/A

**Objective 7: Fostering Diverse, Vibrant, and Connected Communities**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
The Council cannot guarantee investment in economic growth, active travel, or public transport.  Where will the employment come from- building units / business parks aren't going to conjure up jobs, employers must be looking for this type of area and skillset of the community.	There are several key employment areas such as Bro Tathan, Aberthaw and Barry Dock where a commitment has been made by the Welsh Government, Cardiff Capital Region and Associated British Ports to invest in a program of employment and regeneration initiatives. In addition, the Cardiff and Vale College has announced plans to establish a new college within the Vale of Glamorgan at Barry. These investments prioritise highly skilled employment opportunities that shall benefit the local economy and create employment opportunities for residents.  Additionally, the Council has engaged with Transport for Wales to explore opportunities for additional rail services.	N/A
Improved transportation links must be explained and a contingency of the development.	New development proposals will be required to contribute towards enhancing active travel and opportunities for sustainable transport.	N/A
Electric vehicles may gradually replace fossil fuel vehicles suggests that vehicle flows may not decrease significantly if at all and that highway	As part of the evidence base for the Deposit Plan, a Strategic Transport Assessment will be prepared to assess the impact of planned growth on the existing network. New development proposals will be required to address its impact on the highway network, as well as contribute towards enhancing	N/A

capacity improvements would be required to facilitate regeneration.	active travel and opportunities for sustainable transport which will contribute to a reducing private car patronage.	
<p>Much of the Vale of Glamorgan is characterised by its smaller settlements and hamlets, and therefore it is prudent that the objectives acknowledge and appreciate the prospects they can provide.</p> <p>Focusing development solely in locations that are already well served by existing and proposed rail stations as part of the South Wales Metro, this does not support investment (through housing and employment) in rural areas.</p>	Noted. The RLDP supports appropriate growth within rural settlements where this is in keeping with the settlement and its position in the Settlement Hierarchy of the Plan and the services and facilities available with the settlement itself.	N/A
Settlements that are vibrant should not be used as an excuse for overdeveloped.	Comments noted. Vibrancy can be measured in many ways- it is not the case that all settlements would see housing growth. The RLDP will support provision of community facilities, enabling local employment and other facilities or services that contribute towards the vibrancy of settlements.	N/A
Support for the objective. There is a need to facilitate regeneration through the provision of new homes and communities as well as supporting infrastructure.	Support is noted and welcomed.	N/A
<p>Support Objective 7 in principle but consider that it is too generic to apply to all communities in the Vale.</p> <p>The reference to sustainable locations either needs to be removed or defined – it does not follow that a location will be sustainable simply</p>	Comments noted. The Objective would apply to all settlements within the Vale and given the nature of the plan it is inevitable that the Objectives are generic. The RLDP Preferred Strategy sets out what it considers to be a sustainable location.	N/A

because of how it is referred to, in terms of the Settlement Hierarchy.		
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**Objective 8: Promoting Active and Sustainable Travel Choices**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Objective 8 should be re-worded as follows:</p> <p>Ensure major new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.</p> <p>The PS seeks to provide some housing, tourism and employment development in the Rural Vale. By the nature of these communities, they are not inherently the most sustainable locations.</p>	<p>Noted- “major development” would need to be clarified. In planning terms major developments are those which are 10 or more dwelling houses, buildings where the floor space is 1,000 square metres or more, or where development is on a site of 1 hectare or more. Consequently, the rewording of the objective as proposed would be more restrictive on proposals in rural settlements than the current wording and as such is not deemed appropriate.</p> <p>It should be noted that the RLDP supports appropriate growth within rural settlements where this is in keeping with the character of the settlement, its position in Plan’s Settlement Hierarchy and the services and facilities available with the settlement itself. This would include tourism and employment opportunities, and where appropriate affordable housing led schemes.</p>	<p>Clarify ‘major development’</p>
<p>Objective 8 promotes active and sustainable travel, which is good. But there is no reference to reducing car use. Reducing car dependency should be a part of this objective.</p>	<p>Comments Notes. Amend Objective 8 to reference reducing car dependency.</p>	<p>Amend Objective 8 to read Identify opportunities for maximising local transport investment arising from the South East Wales Metro to strengthen public transport connectivity both locally and regionally, provide</p>

		<p>management of the highways network, <b>reducing car dependency</b> and offering safe and effective choices for walking and cycling alongside enhanced public transport services.</p>
<p>Objective 8: needs strengthening to emphasise sustainable transport should be the easiest / default option for new developments.</p> <p>Suggest 'ensure new development is directed to locations that are (or will be by the time of initial occupancy) easily accessible by walking, cycling and public transport' and 'ensure that key public buildings with high volumes of visitors (hospitals, GP surgeries etc) are connected and there are safe and easy active /sustainable travel opportunities for all'.</p>	<p>Comment noted. Amend Objective 8 as suggested.</p>	<p>Suggest 'ensure new development is directed to locations that are (or will be by the time of initial occupancy) easily accessible by walking, cycling and public transport' and 'ensure that key public buildings with high volumes of visitors (hospitals, GP surgeries etc) are connected and there are safe and easy active /sustainable travel opportunities for all'.</p>

<p>We support the overall principle of the policy and note the incorporation of active travel facilities.</p> <p>It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.</p>	<p>Support is welcomed and comments noted.</p>	<p>N/A</p>
<p>How would the South East Wales Metro could 'maximise investment' to strengthen management of the highways network and what that even means. If the highways network becomes more congested, what 'management' activities could relieve that congestion?</p> <p>The vale is in desperate need of bypasses for settlements (Dinas Powys is a chokepoint) sustainable and active travel needs to complement car use.</p>	<p>Investment in the South Wales Metro and improving public transport links to areas of employment will inevitably make these areas attractive to inward investment, enabling greater opportunities to access employment for those living in the Vale of Glamorgan.</p> <p>As part of the evidence base for the Deposit Plan, a Strategic Transport Assessment will be prepared to assess the impact of planned growth on the existing network. New development proposals will be required to address its impact on the highway network, as well as contributing towards enhancing active travel and opportunities for sustainable transport which will contribute to reducing private car patronage.</p> <p>Consideration for a bypass at Dinas Powys has previous been explored and the scheme is not supported by the Welsh Government.</p>	<p>N/A</p>
<p>Locations such in the rural that are considered not to be near rail services have been discounted/are not provided for.</p>	<p>The RLDP supports appropriate growth within rural settlements where this is in keeping with the settlement and its position in the Settlement Hierarchy of the Plan and the services and facilities available with the settlement itself. This would include tourism and employment opportunities, and where appropriate affordable housing led schemes.</p>	<p>N/A</p>
<p>In Rhose the cycle track ends at airport, does not go further, this does not comply with the vision of sustainability.</p>	<p>New development proposals will contribute towards enhancing active travel and opportunities for sustainable transport. This includes improving connections along existing active travel routes.</p>	<p>N/A</p>

**Objective 9: Building a Prosperous and Green Economy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Honourable aims but current Government policy seems to discourage investment and travel to any place of work more than a few miles from communities.	There are several key employment areas such as Bro Tathan, Aberthaw and Barry Dock where a commitment has been made by the Welsh Government, Cardiff Capital Region, and Associated British Ports to invest in a program of employment and regeneration initiatives. In addition, the Cardiff and Vale College has announced plans to establish a new college within the Vale of Glamorgan at Barry. These investments prioritise highly skilled employment opportunities that shall benefit the local economy and create employment opportunities for residents.	NA
Contradicts active travel given Bro Tathan and Aberthaw are difficult to reach by public transport.	The Council is actively engaged with Transport for Wales to seek the reinstatement of a train station at St Athan which enables access to employment located at Bro Tathan and the future green energy park proposed at Aberthaw.  In March 2024 the Department for Transport announced funding for further feasibility for the reintroduction of a new train station and St Athan, also identified within the Preferred Strategy.	NA
Increasing tourism within the Vale may enhance employment opportunities but they would be seasonal.	The Council tourism strategy seeks to encourage and support proposals that will provide all year-round attractions. This aim is supported within the RLDP as is explicitly referenced in Policy SP 14 of the RLDP.	N/A
Supports Objective 9 - Building a Prosperous and Green Economy. This objective recognises the need to provide a range and choice of good quality employment sites.	Support is welcomed and comments noted.	N/A
Support for rural diversification	Support is welcomed and comments noted.	N/A
Agree with the broad thrust of Objective 9 - Building a Prosperous and Green Economy.	Support is welcomed and comments noted.	N/A



<p>The Objective should add the following: "Promote the Bro Tathan employment site as an important employment area, offering air-side and large site inward investment opportunities in addition to other high-quality employment site opportunities.</p>	<p>Comments noted. Bro Tathan is afforded a site-specific policy within the RDLP and as such it is not considered necessary to add further detail to the Objective.</p>	<p>N/A</p>
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**Objective 10: Promoting Sustainable Tourism**

Issue raised	Council response	Action
<p>Government policy is discouraging tourism (20mph speed limit; lack of accommodation; proposed hotel tax).</p> <p>Recently Whitmore Bay has lost its blue flag and Watchtower below minimum bathing standards, how will tourists be attracted to beaches that are not fit for bathing, same issue at Ogmore.</p>	<p>This is not fundamentally a matter for the RLDP the address.</p>	<p>N/A</p>
<p>This should include reference to an increase in tourism visits made by sustainable transport.</p>	<p>Promotion of sustainable transport is explicitly addressed within Objective 8.</p>	<p>N/A</p>
<p>The Vale has been known historically as the Garden of Wales, let's not spoil that with development.</p> <p>Developments proposed must not interfere with the Vale's cultural heritage, archaeological sites, ancient monuments, etc.</p>	<p>Any proposals for tourism would be required to satisfy the relevant policies of the Plan, and in particular Policy SP14 Sustainable Tourism, which requires all new tourism proposals to contribute to the positive image of the Vale as an attractive and sustainable tourist destination.</p>	<p>N/A</p>

We support Objective 10 but would suggest that this needs to be linked to the objectives and policies of the wider area, especially Cardiff.	Support is welcomed and comments noted.	N/A
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### **Strategic Objectives: General Comments**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Largely agree however these are purely replicated from the Themes with the addition of Tourism.	Comments noted. The Objectives have been derived from the Themes. However, the last Theme has been split into two separate Objectives.	N/A
The objectives logically follow on from the key themes of the RLDP and its Vision. They provide a good balance of addressing the Wellbeing of Future Generations Act goals, and aspirations of PPW.	Support is welcomed.	N/A
The order of the objectives are backwards. Tourism should be number 1 as this can be achieved now.	The Objectives are not listed in order of priority.	N/A
Agree with objectives. I fail to see how the development plan at St Athan meets any of these.	Comments noted. An explanation of how the key sites accord with the Objectives is set out in Annex 3.	N/A
It is difficult to disagree with the Objectives.	Comments noted.	N/A
Object to all 10 objectives as it is not considered that the Objectives set out align with RLDP Vision or the proposed allocations.	Comments noted. The Objectives are derived from the Vision and have been formulated through stakeholder engagement. An explanation of how the key sites accord with the Objectives is set out in Annex 3.	N/A
What happens in the future no one knows; the population could increase in the future in Wales, or it could stay static.	Comments noted. The Objectives set out the future direction for the Plan. Key indicators reflecting the delivery of the plan will be monitored on an annual basis.	N/A

Pessimistic as to how these objectives would be met given the current financial climate.	As part of the evidence base for the Deposit RLDP, further evidence of deliverability will be provided. The RLDP is a 15-year plan and whilst it is recognised that the current financial climate is challenging, longer term planning will help achieve these objectives.	N/A
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**Initial Integrated Sustainability Appraisal and Habitats Regulations Assessment**

**Initial Integrated Sustainability Appraisal**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>Comment - The legislative framework and policy context that has relevance to the historic environment should be noted. The Historic Environment (Wales) Act 2016 is current, however this will be replaced by the Historic Environment (Wales) Act 2023 which received Royal Assent in June 2023 and which will come into force in the latter part of 2024 Historic Environment (Wales) Act 2023 (legislation.gov.uk).</p> <p>From a historic environment perspective, the recognition of the value and importance of the historic environment and archaeology in the ISA as one of the topics, and HRA, conserving and enhancing the resource, is noted. Assessed against existing policies, and levels and locations of growth, the Historic Environment theme in the ISA objectives is recognised as potentially being impacted although the extent is uncertain, although the low growth option is noted as being more flexible for choosing sites. In the conclusion, significant negative effects are predicted, with the potential of</p>	<p>Comments noted.</p>	<p>The comments of GGAT in respect of the ISA will be carried forward and incorporated into the ISA of the Deposit Plan.</p>

further mitigation at later stages of the Plan.

The ISA Historic Environment Appraisal of the Preferred Strategy notes the numbers of statutorily protected Scheduled Monuments, Listed Buildings, Registered Parks and Garden, and Registered Landscapes with the Vale of Glamorgan. It must be noted that the Historic Environment Record (HER) to which your authority contributes, includes an additional 4933 core records and 669 event records.

Current Planning Policy Wales Edition 11, in Chapter Six; and TAN 24: The Historic Environment refers to designated and non-designated assets and their management in development. The Welsh Government suite of best practice Guidance available via Cadw has information on managing change within differing aspects of the historic environment. The legislative framework in which the historic environment operates, and the management of the historic environment, should not be seen as any constraint to development, but viewed together with the Well-being of Future Generations (Wales) Act, contribute substantially to the well-being goals relating to culture and

community, and by understanding and enhancement to the remaining goals.		
Objection.	Objection noted.	N/A
I do not agree your assessments fully think of the impact on the environment or the local population.	Comments noted. The ISA focusses on the likely significant effects of the plan and uses a consistent, clear methodology underpinned by the latest evidence to inform the RLDP. Any new evidence will be incorporated into the ISA at the Deposit stage of plan preparation.	N/A
These all underpin all decisions but it appears they are ignored in practice. How can such large scale developments benefit the environment or the wellbeing of future generations?	<p>The Key Sites within the Preferred Strategy have been subject to a robust and detailed site assessment as part of the Candidate Site process. Full details of the assessment process are set out in the Candidate Site Assessment methodology background paper.</p> <p>In identifying sites to meet the required housing requirement, the Council has sought to ensure that sites are generally free from physical constraints such as land ownership, infrastructure, access, ground conditions, biodiversity, landscape, heritage, flood risk issues and pollution.</p> <p>The ISA focusses on the likely significant effects of the plan and uses a consistent, clear methodology underpinned by the latest evidence to inform the RLDP. Any new evidence will be incorporated into the ISA at the Deposit stage of plan preparation.</p>	N/A
<p>Annex 2: Comments on Initial Comment - Sustainability Appraisal Report</p> <p>We have used the findings of the initial SA, such as the appraisal of strategic policies, to inform our advice to you on the Preferred Strategy.</p> <p>With regards to climate change, we consider the ISA suitably acknowledges the requirement for</p>	The comments of NRW are noted, specifically those relating to the presence of designated sites in close proximity to the key site SP4 KS1 at Northeast Barry.	The Council will update the supporting text to the policy in respect of SP4 KS1 Northeast Barry to include clear references to the proximity of designated sites as requested by NRW and will continue to incorporate and

developments to comply with the requirements of Planning Policy and TAN 15 with regard to flood risk and coastal erosion.

With regards to natural resources, it is noted that the ISA acknowledges that there will be at least a degree of loss of these resources. However, it argues that this is largely unavoidable given the limited availability of brownfield land in the Vale. Nevertheless, the ISA concludes significant negative effects are considered to be likely given the level of growth proposed, particularly with regard to the Key Sites proposed.

The ISA acknowledges the number of designated sites present within the Vale of Glamorgan. With regards to the Key Sites, the ISA notes that they have the potential to cause disturbance and habitat loss, particularly with regards to North Easy Barry, given the proximity to Barry Woodlands SSSI. The ISA recommends that Key Site (with particular reference to North Easy Barry) policies are updated to include specific reference to designated sites nearby, establishing appropriate protection/enhancement measures. We note that this advice has not been followed with

reflect the findings of the ISA in the preparation of the Deposit Plan.

<p>respect to SP4 KS1 North Easy Barry.</p> <p>Notwithstanding, we are generally satisfied that the Preferred Strategy has been appropriately appraised through the ISA methodology.</p>		
<p>The report is unclear in its consideration of the population changes and impacts resulting from asylum seekers and refugees - which ought to be assessed in line with the projected needs under Equalities, Diversity and Social Inclusion.</p> <p>Previous arrivals under the Home Office have seen emergency accommodation arranged at hotel accommodation - with limited resettlement options and insufficient housing availability. Future housing provision will need to reflect asylum seeker and refugee arrivals and their access to services and support as part of community cohesion and their integration.</p> <p>Accommodation support is expected to see increased demands on local authority and social housing because of economic impacts on households - with an increase in homelessness.</p>	<p>The representation is requesting a far more detailed assessment than what is required through the ISA process the focus of which is on the likely significant effects of the plan. The ISA uses a consistent, clear methodology, underpinned by the latest evidence to inform the preparation of the RLDP. Any new or emerging evidence will be utilised at deposit stage.</p>	<p>N/A</p>



<p>Housing needs arising from homelessness and those of asylum seekers and refugees are very different in nature and require different solutions and provision.</p>		
<p>Support the principle of a development plan. This one however seems very old fashioned in its approach. There is no proposed methodology for assessing the impact of developments and the Integrated Sustainability Appraisal fails to measure either where the Vale is now with regard to its Carbon Footprint nor how it will measure progress toward Zero Carbon, or what steps are required.</p> <p>It's all to Agenda 21! Nice but vague. A strategy these days will need also to address lifestyles and communication to the general public. It is no longer just about buildings and where you put them.</p>	<p>The preparation of the RLDP follows the guidance set out in the Development Plan Manual Edition 3 March 2020 and as required by the Planning and Compulsory Purchase Act 2004.</p> <p>The ISA fulfils the requirements and duties for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA), Welsh Language Impact Assessment (WLIA) and Well-being of Future Generations (WBFG) and is the primary mechanism for considering and communicating the likely effects of the RLDP. The ISA seeks to inform and influence the plan-making process with a view to avoiding and mitigating negative impacts and maximising positive impacts.</p>	<p>N/A</p>

**Habitats Regulation Assessment of the Preferred Strategy**

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
<p>The Preferred Strategy has been screened through a Habitat Regulations Assessment (HRA). The HRA has been prepared by AECOM (revision 1, dated September 2023) on behalf of the planning authority.</p>	<p>The comments of NRW in respect of the HRA and specifically the conservation objectives for the Severn Estuary and fish migration within the Severn are noted and these comments will be fully considered in the HRA for the Deposit Plan.</p>	<p>Council to advise Aecom of NRW comments to ensure that they are fully considered in the HRA of the Deposit Plan.</p>

The HRA refers to the incorrect conservation objectives for the Severn Estuary EMS and we are therefore unable to provide a complete response on the assessment until the correct conservation objectives are presented and used in the assessment.

Please note that the current conservation advice for the Severn Estuary EMS is the Regulation 33 Advice Package, agreed by both NRW and Natural England (NE), which can be accessed [here](#).

#### Functionally Linked Land

We recommend that consideration of impacts upon functionally linked land should include migratory fish features of the Severn Estuary EMS as well as bird features. Further details are provided below.

#### Fish

We recommend that the HRA considers the potential for impacts on the diadromous fish features and sub-features of the Severn Estuary SAC and Ramsar site. This is due to the potential functional linkage of the site for diadromous fish species (river lamprey, sea lamprey, Atlantic salmon, sea trout and European

eel), as parts of the River Ely and its tributaries provides supporting habitat for essential life cycle processes of some or all the diadromous fish species, and contributes a proportion of the whole estuary population of the diadromous fish species. Therefore, effects upon the River Ely populations of the diadromous fish species could reduce the estuary populations of the species, which may have an adverse effect on site integrity in view of the conservation objectives of the site.

Birds

As these development plans are at an early stage, there is limited detail as to the density and proximity to coastal features planned housing infrastructure will be built to. We welcome the H R A) scoping outputs and agree with the potential impact pathways highlighted; the increase in recreational pressures, coastal squeezing, and potential noise disturbance to migratory and wintering waders and waterfowl during construction, being most pertinent.

Once there is further detail surrounding the exact locations of development, further advice regarding potential impacts to bird features of the Severn Estuary

SAC/SSSI/SPA and Ramsar site can be provided.

#### Marine Water Quality

We welcome surface water runoff impacts to the Severn Estuary being considered further at deposit stage and we advise that the worst-case scenario is assessed in terms of impacts to designated site at that stage.

#### Recreational Pressures

We agree that recreational pressure impacts to the Severn Estuary EMS should be considered further as part of the deposit plan HRA. We strongly recommend cross-border collaborations with other authorities along the Severn Estuary, building on work already undertaken by Stroud District Council and other authorities.

#### Coastal Squeeze

We note that coastal squeeze has been screened into the assessment and taken through to the Appropriate Assessment, where a conclusion of no adverse impacts 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' (Section 6.85 of the HRA).

If this is to change, we would expect sufficient assessment of the impacts on coastal squeeze.		
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## Consultation and Welsh language

This section sets out general comments made about the plan, as well as comments raised under the 'Have your say on the Preferred Strategy' section of the plan regarding the consultation itself.

Representors were asked what impact the policies and proposals would have on the Welsh language. The responses are also considered in this section.

### General Comments

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Concern about previous planning decisions made by the Council.	The RLDP must be based on sound evidence and in accordance with due process. Whilst the Council is responsible for preparing a sound plan, the decision on whether it is acceptable rests with an Independent Planning Inspector.	N/A
Levelling up funding can provide greater support for the LDP.	Comment noted.	N/A
Inclusion of a glossary in LDP	The Council will consider the need to include a glossary of terms within the Deposit Plan	Consider the inclusion of a glossary of terms in the Deposit Plan.

### Have your say on the Preferred Strategy

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Difficult process for making comments.  Not clear where to register or where to make comments.	Noted. A help guide was available on the online consultation portal and Planning Policy Officers were also available to contact via email, phone or post every working day within working hours during the whole 10-week consultation period to help guide representors through the comment process. Comments could be made online, via email or by post as stated on consultation advertisements.	Consider feedback from consultation to see how future consultations

<p>Email response requires people to download representation form from online portal.</p> <p>Restrictions on online forms unhelpful and help from planning department unforthcoming.</p> <p>Lack of willingness to make the consultation process easy and productive.</p> <p>Initial Consultation period was over Christmas and New Year, only extended when requested by locals.</p> <p>Difficult navigation of website made it hard to object.</p> <p>Not accessible to all</p>	<p>Representation forms were available to download via the online consultation portal to either email or print and post to the LDP team at the Docks Offices. If unable to access the forms online, representations in traditional email format were accepted and hard copies of all representation forms were made available at the 7 drop-in sessions to be filled out and posted to the LDP team at the Docks Offices.</p> <p>All consultation documents were available to view on the online consultation portal and hard copies of the Preferred Strategy and relevant supporting documents were made available in all council-run libraries and Civic Centre to ensure accessibility to all. Comments could be made on the online portal or by email or post as stated on the consultation advertisements.</p> <p>To accommodate for the Christmas and New Year break, the Preferred Strategy consultation was set to run for 8 weeks. When the Revised Delivery Agreement and Draft Preferred Strategy was reported to Special Council on Monday 20<sup>th</sup> November 2023, it was agreed that the Public Consultation period be extended to 10 weeks. The Council's 10-week Preferred Strategy consultation both met the requirements in Regulation 16 of the LDP regulations of a 6-week statutory period and appropriately accommodated for the Christmas and New Year break as viewed by Special Council.</p>	<p>could be improved.</p>
<p>Look forward to hearing everyone's feedback in the Vale and I hope the Council listens.</p>	<p>The Council has carefully considered the responses we received, and this Initial Consultation Report has been prepared to set out who was consulted, the main issues raised and how these comments have influenced the next stage of plan preparation – the Deposit RLDP.</p>	<p>N/A</p>
<p>Failure to engage with the Knap Community Group keen to retain and develop the Knap Lifeguards Building. Wish to be considered for Community Asset Transfer or</p>	<p>The Delivery Agreement (DA, Revised November 2023) provides a list of specific consultation bodies that the Council must consult at all consultation stages in the preparation of the LDP as well as general consultation bodies to be consulted at relevant stages. The DA was subject to public consultation in 2022 and subsequently approved by Welsh Government.</p>	<p>Advise Neighbourhood Services of the request.</p>

<p>LA/Community partnership arrangement to save the building and refurbish it to protect its heritage.</p>	<p>Whilst the Knap Community Group are not listed with the DA, as representors to the Preferred Strategy they will be added to the consultation database and notified of any subsequent consultations. The asset transfer of the Knap Lifeguards Building is not a matter for the RLDP, but the request will be passed to Neighbourhood Services, who own the building.</p>	
<p>Consultation poorly advertised.  Information on Key Sites only available after 140+ pages.</p>	<p>Please refer to chapter 2 'Consultation Methods' at the start of this report which provides detailed information on the large range of resources and tools used to advertise the pre-deposit consultation.  Noted. Information on the Key Sites formed part of Chapter 6 'Preferred Strategy' in the Preferred Strategy document. If making comments using the online portal, respondents were able to click on the headings under each chapter, for example 'SP4 KS1 NORTHEAST BARRY' and were directed straight to that part of the document.</p>	N/A
<p>Impossible for a member of the public to disseminate documents of this size and complexity from the list of supporting documents.  Cross-referencing is ambiguous and highly confusing.</p>	<p>In the interests of transparency, it is necessary to publish the evidence base that sits behind the Preferred Strategy. All long supporting documents included an executive summary. An Easy Read copy of the Preferred Strategy was also available online and in local libraries.  It is not clear from the representation which cross-referencing the representor is referring to.</p>	N/A
<p>Flawed Governance and Consultation. Preferred Strategy agreed by the Council's Cabinet prior to consulting with residents. Council demonstrates consulting and listening to communities does not apply to them and puts developers before communities.</p>	<p>In accordance with the Delivery Agreement, a series of engagement events were held with key stakeholders in the preparation of the Preferred Strategy. Formal consultation, however, could not commence until approved by full Council.  This Initial Consultation Report has been prepared to set out who was consulted, the main issues raised and how these comments have influenced the next stage of plan preparation – the Deposit RLDP.</p>	N/A



<p>Preferred Strategy is riddled with errors and conclusions unsupported by evidence.</p>	<p>There is a substantial evidence base behind the Preferred Strategy, which was available for interested parties to comment on.</p> <p>Any factual inaccuracies or typographical errors identified as part of this consultation will be reviewed.</p> <p>Noted. All consultation documents were proofread by the Council. Further evidence including the policies, land use proposals and infrastructure that will be required to support development will be provided in the Deposit RLDP which will be subject to public consultation in early 2025.</p>	
<p>Insufficient engagement with the local community.</p>	<p>The Council held online information sessions in December 2023 and in-person drop-in sessions in January 2024 to engage with the local community to inform and clarify any queries or concerns. The in-person drop-in sessions were held in each of the communities with Key Sites as well as any other relevant locations. Planning Policy Officers were also available to contact via email, phone or post every working day within working hours during the whole 10-week consultation period.</p>	<p>N/A</p>
<p>Evidence of third parties not provided to the public (Welsh water, NRW).</p>	<p>The Council are in the process of liaising with statutory undertakers and further evidence will be published at Deposit stage.</p>	<p>N/A</p>
<p>Absence of any consultation with the communities of St Athan ward and their representatives (Community Council) which is contrary to the key aims of the development plan system in Wales.</p>	<p>A workshop for Community Councils was held on the 21<sup>st</sup> of October 2022 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 sets the direction of the RLDP up to 2036. Town and Community Council Clerks were welcomed to either attend themselves or send a representative on behalf of their organisation. Despite invitation, St Athan Community Council did not attend this session.</p>	<p>N/A</p>

	<p>A workshop for Town and Community Councils was held on the 8<sup>th</sup> of February 2023 to inform the growth and spatial options taken forward and identified in the Preferred Strategy. Town and Community Council Clerks were welcomed to either attend themselves or send a representative on behalf of their organisation. Despite invitation, St Athan Community Council did not attend this session.</p> <p>On both occasions, 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.</p> <p>Following on from these pre-consultation engagement sessions, the Council held a Town and Community Council Online Briefing Session on Wednesday 29<sup>th</sup> November 2023 in advance of the Preferred Strategy consultation start date (Wednesday 6<sup>th</sup> December 2023) to provide awareness of the implications of the Preferred Strategy and its content, as well as provide details on the consultation process and associated engagement. St Athan Community Council were invited, and representatives attended.</p> <p>It is inaccurate to state that the Council has not afforded Community Councils, including St Athan Community Council, the opportunity to discuss and comment on the emerging plan.</p> <p>The Preferred Strategy is the first formal consultation opportunity for residents to have their say on the proposals in the Preferred Strategy.</p>	
<p>Land/homeowners not consulted appropriately. Word of mouth and social media not an acceptable route to discuss such grave concerns.</p>	<p>The consultation was carried out in accordance with the Delivery Agreement and was well publicised by a variety of means including notifying those people who had registered an interest in the RLDP or more generally on Council consultations, posters in local consultation venues and an extensive social media campaign. Elected members were also asked to share the consultation in their communities. The public consultation events were well attended, and a large number of responses were received to the</p>	<p>N/A</p>

	consultation, as a result of the Council's consultation processes and also through information being shared by communities themselves.	
Response to consultation will be poor and comments that are made will be seen as minority.	The Council received a significant number representations in response to the Preferred Strategy consultation. The Council has carefully considered the responses we received, and this Initial Consultation Report has been prepared to set out who was consulted, the main issues raised and how these comments have influenced the next stage of plan preparation – the Deposit RLDP.	N/A
Local views are ignored, despite Vaughan Gethin recently emphasising how we should be listening to local people about their local needs.	The Council has carefully considered the responses received, and this Initial Consultation Report has been prepared to set out who was consulted, the main issues raised and how these comments have influenced the next stage of plan preparation – the Deposit RLDP.	N/A
Quality of online information is poor. Much of the writing on the development plan maps and detailed cartography is unreadable.	If viewing an online map, viewers can zoom in to obtain a better view. Large copies of the key sites plans, and key diagram were available at the drop in sessions.	N/A
Local people not listened to at the drop-in session and were given stock answers.	<p>The 7 in-person drop-in sessions were organised to provide information on the Preferred Strategy, clarify any queries or concerns and advise where and how to make formal comments on the plan. Planning Policy Officers spent time with all that attended, listened to them closely and provided relevant responses to questions posed during the drop-in sessions. In a few cases, the evidence or detail required to respond to a query or concern was not prepared as part of the Preferred Strategy and would be provided during the next stage of the RLDP – Deposit Plan.</p> <p>The Council has carefully considered the responses received, and this Initial Consultation Report has been prepared to set out who was consulted, the main issues raised and how these comments have influenced the next stage of plan preparation – the Deposit RLDP.</p>	Provide more detailed answers during the next public consultation using the evidence and detail prepared as part of the Deposit Plan.

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### What will happen after the Consultation?

Issue raised	Council response	Action
Is there a published list of comments made by the public against the proposal?	<p>Representors (public) can view all the comments they have submitted on the Preferred Strategy consultation documents using the online consultation portal at this link: <a href="http://Vale of Glamorgan Council / Cyngor Bro Morgannwg - Consultations (oc2.uk)">Vale of Glamorgan Council / Cyngor Bro Morgannwg - Consultations (oc2.uk)</a>. Click login or register in the top right and once logged in, you can click on 'my account' in the same place, then 'submitted' and all your comments will be available to view.</p> <p>The Council has carefully considered the responses received, and this Initial Consultation Report has been prepared to set out who was consulted, the main issues raised and how these comments have influenced the next stage of plan preparation – the Deposit RLDP.</p>	N/A
It would be good to assure people that they are really listened to. It is local feeling that you do not appear to care about what people think.	The Council has carefully considered the responses received, and this Initial Consultation Report has been prepared to set out who was consulted, the main issues raised and how these comments have influenced the next stage of plan preparation – the Deposit RLDP.	N/A
Point 1.21 states 'once adopted' suggesting this is a foregone conclusion and the council is providing residents with empty talk.	The Preferred Strategy is the first statutory consultation stage in the RLDP preparation process, and it is not the final plan. This Initial Consultation Report sets out how the comments made during this consultation have influenced the next stage of the plan preparation – the Deposit RLDP - which will set out all the policies, land use proposals or infrastructure that will be required to support development. The terminology used in paragraph 1.21 of the Preferred Strategy refers to the Replacement LDP being adopted subject to the recommendations made by the Inspector in the Inspector's Report once the Deposit RLDP is submitted for examination. The Council must accept the changes recommended by the Inspector and adopt as	N/A

	amended. If the Inspector considers the plan to be fundamentally unsound it will not be recommended for adoption. Concerns regarding 'once adopted' are noted and the Council would assure representors that there is no inference of a foregone conclusion.	
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## Welsh Language

Representors were asked if the proposals would have any impact on the Welsh language. This was a mandatory question for all representors completing a web representation. A total of 1,044 representations included some kind of response of this. Of these 84% either responded with no comment, that there was no impact or that they did not consider the question to be applicable. A further 8% responses stated that they were unsure if there would be any impact. Only 8% of respondents considered that there would be an impact – all of which expressing that this would be a negative impact. The concerns expressed are listed below.

### Impact on the Welsh language

<b>Issue raised</b>	<b>Council response</b>	<b>Action</b>
Population - Population increases could mean immigration of non-Welsh speakers, diluting village identity.	<p>The Vale of Glamorgan is one of the only Councils in Wales to have an increase in Welsh speakers from 10.8% in 2011 to 11.5% recorded in the 2021 census. This is contrast with the rest of Wales decreasing in Welsh speakers overall and highlights the fact that population increase in Vale is not a significant factor in number of Welsh speakers. A sense of identity of villages are more centred on tangible aspects like placemaking, natural heritage and community cohesion.</p> <p>A Welsh language background paper will be prepared as part of the evidence for the Deposit Plan.</p>	Prepare a Welsh language background paper as part of the evidence for the Deposit Plan.
Education - Lack of Welsh Schools accommodate development in the area	The Council's Sustainable Communities for Learning Team, responsible for education, have been engaged to understand the implications of the Replacement LDP. This includes a consideration of the impact on service provision and whether increased capacity is required. This will include consideration of provision for Welsh Medium Education. Through this collaboration, the Council will be able to plan for future service requirements and plan accordingly.	The Deposit Plan will be supported by a background paper which considered the impact of new development on school capacity and how this can be addressed.
Limited Community and retail to support the Welsh language	Improvement of policy so that community and retail our recognised as functions that support the Welsh language, developments that support local	N/A

	community and provide additional space for retail and social cohesion should be seen as benefit to the Welsh language.	
Development will impact negatively on the Heritage and Environment which will have subsequent impact on the Welsh Language	The council recognise the importance of the heritage and environment has on the Welsh language within the Vale. A Welsh language background paper will be prepared as part of the evidence for the Deposit Plan.	Prepare a Welsh language background paper as part of the evidence for the Deposit Plan.

## Stage 2 Candidate Site Register

Whilst the formal consultation documents were the Preferred Strategy, Initial ISA and HRA, representors were also given the opportunity to comment on the supporting documents and the Candidate Sites Register. Representations were received on 22 of the candidate sites, as set out below. The table includes the number of representations made in the form of support, objection or comment. Duplicate representations have only been counted once, but if representations made comments in relation to more than one candidate site, these have been counted separately. For example, many respondents made an identical representation under Candidate Site 473 and Candidate Site 481 – these were counted separately.

To aid responding to the representations, where representations were made on candidate sites that were shown as Key Sites or Rolled Forward sites, these have been addressed in the Key Housing-Led section of the ICR.

Responses have been processed on the basis of whether the respondent supports the principle of the site being allocated for the use identified in the Candidate Sites Register, not on whether the site has passed or failed the candidate site assessment.

The ICR does not include a response to the candidate site representations, but the representations made and supporting information submitted will be assessed as part of the ongoing candidate site assessment process.

Barry					
		Support	Object	Comment	Total
384	Hayes Lane	1	0	1	2
426	Land at Ffordd y Milleniwm	0	0	1	1
449	Land at Weycock Cross, South of Port Road, Barry	1	2	1	4
487	Land at Neptune Road, Barry Waterfront	1	1	1	3
371	Walters Farm, Barry	1	2	0	3
407	Land West of Coed Mawr Road, Barry	0	1	0	1



<b>Coastal Vale</b>					
		<b>Support</b>	<b>Object</b>	<b>Comment</b>	<b>Total</b>
377	Land adjoining Heritage Business Park	0	0	1	1
379	Land at Bridge House Farm	4	26	2	32
436	Land between Llantwit Major and Llanmaes	20	3	1	24
473	Land south of the B4265	2	41	1	44
481	Land to the North of Boverton Road	1	32	1	34
366	Land South of Clive Road, St Athan	2	7	1	10
399	Land at St Athan	0	2	1	3
457	Land South of B4265, St Athan	0	3	0	3
361	Land at Port Road, Rhoose	0	0	1	1
408	Land at East Aberthaw	1	0	0	1
395	Land at St Nicholas	0	3	0	3
447	Land at Ringwood Crescent, St Athan	1	4	0	5

<b>East Vale</b>					
		<b>Support</b>	<b>Object</b>	<b>Comment</b>	<b>Total</b>
393	Old Dairy Site, Bonvilston	1	0	1	2

412	Land east of Port Road, Wenvoe	0	0	1	1
417	Wenvoe Quarry	0	0	1	1
385	Land at Bonvilston	1	0	0	1
435	Land South of A48, Bonvilston	1	0	0	1
490	Land to the north of Pendoylan	1	0	0	1
378	Land North East of Primary School, Peterston-Super-Ely	1	0	0	1
381	Land on the north side of Nantywern, Peterston Super Ely	1	0	0	1
454	Land at Peterston Super Ely	1	0	0	1
460	Land adjoining The Spinney	1	0	0	1
486	Land to the South of the A48 at St Nicholas	1	0	0	1
441	Land at the Downs	1	0	0	1
437	Swn Y Coed, Wenvoe	1	0	0	1
451	Land at Oaktree Farm, East of Port Road, Wenvoe	1	0	0	1
552	Land off Port Road, Wenvoe	1	0	0	1

Penarth and area					
		Support	Object	Comment	Total
444	Land north of Dinas Powys	1	4	3	8

365	Leckwith Quay	1	0	2	3
400	Land off Penlan Road, Llandough	1	20	2	23
484	Land at Hayes Road, Barry	0	1	1	2
356	Land east of Pen-y-Turnpike Road, Dinas Powys	0	3	0	3
369	Land South of Cross Common Road, Dinas Powys	1	3	0	4
419	Land at the Grange, Pen-Y-Turnpike Road, Dinas Powys	0	3	0	3
423	Land North of Dinas Powys	0	2	0	2
425	Land at St Andrews Quarry, Dinas Powys	0	2	0	2
431	Land off Caerleon Road, Dinas Powys	1	3	0	4
443	Land at Caerleon Road, Dinas Powys	0	4	0	4
353	Land on the West Side of Cardiff Road, Dinas Powys	0	3	0	3
368	Former Cogan Reservoir Site	0	4	0	4
429	Land at Pen y Turnpike Road, Llandough	1	3	0	4
434	Land at Pen y Turnpike Road, SW of Llandough Hospital	0	3	0	1
354	Brynawel Garden Centre	0	1	0	1
376	Land west of Swanbridge Road, Sully	1	1	0	2
450	Hayes Road, Sully	0	1	0	1
452	Hayes Road, Sully	0	2	0	2

<b>Rural Vale</b>					
		<b>Support</b>	<b>Object</b>	<b>Comment</b>	<b>Total</b>
453	Land to the East of Colwinston	1	0	0	1
391	Land at St Nicholas	0	3	0	3
570	Land off Wick Road, Ewenny, Option 2	1	3	0	4
571	Land off Wick Road, Ewenny, Option 3	1	3	0	4
367	Land South of Llantwit Major Road, Cowbridge	1	0	0	1
455	Land North of Primrose Hill, Cowbridge	1	0	0	1
514	Land East of St.Athan Road, Cowbridge	0	4	0	4
555	Land off Vale Court, Cowbridge	0	8	0	8
448	Land at Llandow Airfield	1	0	0	1
402	Land adjacent to Llangan Primary School	1	0	0	1
403	Land east of Llangan	1	0	0	1
386	Land at Hazelwood, Ogmere By Sea	1	2	0	3
494	Land South West of Sigingstone (Parcel 1)	1	0	0	1
389	Land at Three Golden Cups, Southerndown	1	2	0	3
565	Land at Nant Canna, Treoes, Option 2	1	0	0	1
355	Land West of St Brides Road, Wick	1	0	0	1
405	Land at Waun Gron, Ystradowen	0	0	1	1
430	Land at Ystradowen	1	0	0	1

## **Annex 9 Organisations consulted on the Preferred Strategy**

### **Specific Consultation Bodies**

- Welsh Government (Planning Division)
- Natural Resources Wales (NRW)
- CADW
- Office of the Secretary of State for Wales
- Network Rail Infrastructure Limited (Western & Wales) – (Property)
- Secretary of State for Transport (in relation to previous Strategic Rail Authority functions)
- UK Government Departments – Department of Business, Energy and Industrial Strategy
- Home Office
- Ministry of Defence
- Cardiff and the Vale University Health Board
- Planning & Asset University Hospital of Wales
- Vale of Glamorgan Town and Community Councils
  - Barry Town Council
  - Cowbridge with Llanblethian Town Council
  - Llantwit Major Town Council
  - Penarth Town Council
  - Colwinston Community Council
  - Dinas Powys Community Council
  - Ewenny Community Council
  - Llancafarn Community Council
  - Llandough Community Council
  - Llandow Community Council
  - Llanfair Community Council
  - Llangan Community Council
  - Llanmaes Community Council
  - Michaelston le Pit Community Council
  - Pendoylan Community Council
  - Penllyn Community Council
  - Peterston super Ely Community Council
  - St Athan Community Council
  - St Brides Major Community Council
  - St Donats Community Council
  - St Georges and St Brides super Ely Community Council
  - St Nicholas with Bonvilston Community Council
  - Sully and Lavernock Community Council
  - Welsh St Donats Community Council
  - Wenvoe Community Council
  - Wick Community Council
- Adjoining Local Authorities
  - Cardiff Council
  - Bridgend County Borough Council

- Rhondda Cynon Taf County Borough Council
- Adjoining Community Councils within other local authorities
  - Bridgend County Borough Council
    - Bridgend Town Council
    - Coychurch Lower Community Council
    - Merthyr Mawr Community Council
    - Pencoed Town Council
  - Cardiff Council
    - St Fagans Community Council
    - Pentyrch Community Council
  - Rhondda Cynon Taf County Borough Council
    - Llaharan Community Council
    - Llanharry Community Council
    - Pontyclun Community Council
- Mobile Phone Operators
- Service Providers
  - Dwr Cymru Welsh Water
  - National Grid/Transco
  - British Gas
  - Swalec
  - EON UK
  - EDF Energy
  - Scottish Power
  - SSE
  - Wales & West Utilities
  - Western Power Distribution
  - Npower
  - Powergen
  - BT Group Plc
  - Virgin Media

In addition, CADW are a statutory consultee for the Strategic Environmental Assessment (SEA) of the Plan and have been consulted at the relevant stages in the process.

### **General Consultation Bodies**

The following is a list of general consultation bodies included in the Delivery Agreement (revised December 2023). In a small number of cases, it was not possible to consult with the organisation in question as the group no longer existed or up to date contact details were unavailable. Where this was the case, alternative organisations representing similar interests were consulted instead. This is highlighted in brackets next to the organisation name.

Voluntary Bodies, some or all of whose activities benefit any part of the Local authority's area:

- Action for Children
- Advocacy Matters (Wales)
- Age Concern Cardiff & Vale
- Age Concern Cymru
- Alzheimer's Association

- Asthma UK Cymru
- Barry Dock Lifeboat
- Barry Island Historical Group (no contact details available. However Civic Trust Cymru and Penarth Civic Society were consulted)
- Barry Preservation Society and Civic Trust (no contact details available. However Civic Trust Cymru and Penarth Civic Society were consulted)
- British Horse Society
- British Trust for Ornithology
- Business in the Community Wales
- BTCV
- Butterfly Conservation (South Wales Branch)
- Campaign for Protection of Rural Wales (CPRW)
- Campaign for Real Ale (CAMRA)
- Cardiff Cycling Campaign
- Cardiff & The Vale of Glamorgan Area Scout Council
- Cardiff & Vale Parents Federation
- Cardiff Justice and Peace Group
- Cardiff Naturalists' Society
- Citizens Advice Cardiff & Vale
- Civic Trust Cymru
- Clybiau Plant Cymru Kids Club
- Coed Cadw / The Woodland Trust
- Coed Cymru
- Community Matters
- Country land and Business Association
- Cowbridge History Society
- Duke of Edinburgh's Award
- Friends of the Earth Cymru
- Glamorgan Federation of Women's Institutes
- Glamorgan Voluntary Services
- Green Lane Association
- International Bee Research Association (IBRA)
- Llancafarn and District Community Association
- Llantwit Major Local History Society
- Llantwit Major Men's Probus
- Lower Penarth Community Association
- Llamau
- National Children's Homes (this is now known as Action for Children, who are listed above)
- National Allotment Society (NSALG)
- One Voice Wales
- Open Spaces Society
- Penarth Ramblers
- Ramblers Cymru
- Penarth Sea Angling Club

- Penarth Civic Society
- Planning Aid Wales
- Renewable UK
- Rotary Club of Llantwit Major
- Royal National Lifeboat Institute
- Royal Society for the Protection of Birds (RSPB)
- Showman's Guild of Great Britain, South Wales and Northern Ireland
- Sustrans Cymru
- The Amelia Trust
- The British Horse Society
- The Theatres Trust
- The Trussell Trust
- Time to Change Wales
- Trail Riders Fellowship
- Vale of Glamorgan District Sports Council
- Vale of Glamorgan Group, Ramblers Association
- Vale of Glamorgan Neighbourhood Watch Association
- Vale of Glamorgan Tourist Centre (Wales)
- Valeplus
- Vale Ways
- Vale 50+ Forum
- Welsh Assembly of Women
- Welsh Beekeepers Association
- Welsh Historic Gardens Trust
- Welsh Trail Riders
- Wildlife Trust for South & West Wales
- WRVS
- Youth Cymru
- Youth Hostel Association

Bodies which represent the interests of different racial, ethnic or national groups in the local authority's area

- UK Association of Gypsy Women (UKAGW)
- Equality & Human Rights Commission
- Race Equality First
- Race Alliance Wales
- Show Racism the red Card
- Stonewall Cymru
- Commission for Racial Equality (this has been disbanded and replaced by Equality & Human Rights Commission, listed above)

Bodies which represent the interests of different religious groups in the local authority's area

- All Nations Centre
- Big Ideas / Ignite
- The Presbyterian Church of Wales



- Jehovah's Witnesses
- Muslim Welfare Association of Vale of Glamorgan
- Roman Catholic Archdiocese of Cardiff
- The Orthodox Church in Wales
- The Salvation Army
- Tynwydd Rd Congregational Church (this church has closed but other religious groups have been consulted)
- U.K. Islamic Mission
- Undeb Bedyddwyr Cymru (Union of Welsh Baptists)
- United Free Church
- United Reformed Church (Wales) Trust

Bodies which represent the interests of disabled persons in the local authority's area

- Barry & District Mencap
- Cardiff and Vale Mental Health Development Project
- Cardiff & Vale Coalition of Disabled People (consulted under new name of Diverse Cymru)
- Mencap Cymru
- MIND in the Vale of Glamorgan
- Mirus Wales
- Penarth Blind Club
- Penarth Hard of Hearing Club (no contact details available but Hard of Hearing & Tinnitus Support Group were consulted as an alternative)
- Sight Life
- Wales Council for Deaf People
- Disability Wales

Bodies which represent the interests of persons carrying on business in the Local authority's area

- Business Eye
- The Business Centre
- Country Land and Business Association
- Cowbridge Chamber of Trade
- National Farmers Union Cymru
- Middleton Farming Trust (no contact details available but National Farmers Union Cymru consulted above)
- Federation of Master Builders
- Home Builders Federation
- Welsh Federation of Housing Associations consulted under new name of Community Housing Cymru)
- Mineral Products Association
- Mobile Operators Association (consulted as Mobile UK)

Bodies which represent the interests of Welsh culture in the authority area

- Cymdeithas yr iaith Gymraeg
- Institute of Welsh Affairs
- Menter Iaith Bro Morgannwg

## Other Consultation Bodies

The following is a list of other consultees who will be consulted during the preparation of the Replacement LDP. This list is not exhaustive and can be added to where appropriate.

### Emergency Services:

- South Wales Fire and Rescue Service
- South Wales Police – Secured by Design Officer
- Welsh Ambulance Services NHS Trust

### Housing Associations:

- Hafod Housing Association
- Newydd Housing Association
- United Welsh Housing Association
- Wales and West Housing Association

### Professional bodies / QUANGOs

- Arts Council of Wales
- British Geological Survey
- CBI Wales
- Chamber of Trade
- Design Commission for Wales
- District Valuer Services
- Glamorgan Gwent Archaeological Trust Ltd
- HSE Hazardous Installations Directorate
- Landscape Institute Wales
- Public Health Wales
- RICS Wales
- Sports Council for Wales (Vale of Glamorgan Sports Council consulted)
- Fields in Trust Cymru
- The Civic Trust For Wales
- The National Trust
- Visit Wales
- Department of Enterprise, Innovation and Networks (DEIN) – previously WDA
- Welsh Local Government Association

### Transport Operators / Interest Groups

- Associated British Ports
- Cardiff City Transport Services
- Cardiff Airport
- Cardiff Harbour Authority
- Cardiff & Vale University Health Board (Transport)
- Civil Aviation Authority
- CILT (UK) Cymru Transport
- Confederation of Passenger Transport

- C.T.C Right to Ride
- Easyway Minibus Hire Ltd
- First Cymru Buses Ltd
- Cardiff Bus
- New Adventure Travel Ltd
- Network Rail
- Transport Focus
- Penarth Section Cardiff Cycling Campaign
- Railfuture (RDS) Wales
- Transport for Wales
- Transport for Wales Active Travel
- Transport for Wales Station Integration
- Vale of Glamorgan Railway Company

Cardiff Capital Region Joint Cabinet and Other Local Authorities in the Cardiff Capital Region (adjoining Local authorities listed above)

- Cardiff Capital Region Joint Cabinet
- Newport City Council
- Merthyr Tydfil County Borough Council
- Blaenau Gwent County Borough Council
- Torfaen County Borough Council
- Caerphilly County Borough Council
- Monmouthshire County Council



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