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Our ref: qa1170817
Your ref: P/Pol/ER/LDP34

02nd September 2015

Dear Mrs Reed,

**Vale of Glamorgan Council – Consultation on the Schedule of Proposed Focussed Changes
(Welsh Government Rep ID - 4679)**

Thank you for your letter of 23rd July 2015 notifying the Welsh Government of Vale of Glamorgan Council's Schedule of Proposed Focussed Changes consultation.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. The proposed Focussed Changes have been considered in the light of the representations made to the Deposit Plan on 20 December 2013 and in accordance with the tests of soundness. In particular, the consistency, coherence and effectiveness tests and whether the Plan has had satisfactory regard to national planning policy – test C2, whether there are clear mechanisms for implementation and monitoring – test CE3 and whether it is reasonably flexibility to enable it to deal with changing circumstances test - CE4.

The attached **Annex** provides a detailed response on whether the Schedule of Proposed Focussed Changes meets the matters raised in our deposit representations. Further to the above, we consider **the focussed changes are silent** in respect of a number of key issues that were raised within our deposit representation. The annex sets out where and why our objections are still maintained.

I wish to draw your attention specifically to:

- **Scale and Location of Growth / Policy approach in Minor Rural Settlements**
- **Deliverability & Implementation of Housing Sites - Infrastructure delivery, flexibility and phasing**

- **Renewable Energy – does not transcribe national policy**
- **Deliverability & Implementation of Employment Sites**
- **Gypsy and Traveller Provision – Suitability and Deliverability of Proposed Allocation**
- **Flood Risk – Deliverability and suitability of allocations, policy approach**

In addition, we have further representations where the approach requires clarification in light of national policy and/or limited supporting evidence base.

- Affordable housing target / policy approach
- Waste
- Best Most Versatile (BMV) Agricultural Land
- Planning Obligations / CIL
- Minerals
- Monitoring framework

Whilst we note that the Welsh language has been considered as part of the Sustainability Appraisal, the evidence would benefit from being updated to reflect the most recent 2011 census data.

It is considered that it may be possible for the above matters to be addressed and explained as part of the hearing sessions or as Matters Arising Changes (MACs) if deemed necessary by the Inspector.

Yours sincerely,

Candice Myers
Senior Planning Manager
Planning Directorate

Annex

Annex to Welsh Government's letter (02nd September 2015) in response to Vale of Glamorgan County Council's proposed Schedule of Focussed Changes

FC No.	Welsh Government Comment
Level of Housing Provision & Methodology	
<p>FC3 FC12</p> <p>Objection addressed</p>	<p><u>Welsh Government (WG) Population and Household Projections 2011</u> (WG Deposit Rep B1.c)</p> <p>Planning Policy Wales (PPW, para 9.2.2) states that the latest WG household projections should form the starting point when assessing the housing requirement for a plan. The level of housing provision in the Deposit Plan was based on the 2008-based household projections, taking account of Mid Year Estimates for 2009 and 2010. The Welsh Government highlighted in its representation that the Council would need to consider the implications of the 2011-based projections when published.</p> <p>The Welsh Government objected to the both the level of housing provision and the lack of flexibility at the Deposit Plan stage (B1.a & B1.b). Primarily, the Welsh Government sought clarification on the interrelationship between the level of housing provision, and the Council's economic and employment proposals. Our comments in respect of flexibility and the deliverability of housing sites are covered later.</p> <p>We note that FC3 and FC12 amend the housing requirement within Policy SP3: Residential Requirement and Policy MG1: Housing Supply in the Vale of Glamorgan. The proposed FCs reduce the housing requirement to 9,500 dwellings, a reduction of 450 dwellings from the Deposit Plan. However, we note the overall level of housing provision remains the same (10,450 dwellings). As a result the level of flexibility has increased from 5% to 10%. We support the increased flexibility in principle.</p> <p>The Welsh Government also supports the update to the Population & Housing Projections Background Paper (2015 update) which considers the implications of the latest Welsh Government 2011-based population and household projections against the criteria listed in PPW (9.21 & 9.22) and why the level of provision should remain at 10,450 dwellings.</p> <p>The Council concludes that an overall level of housing provision of 10,540 dwellings remains valid in order to deliver on the strategy and key objectives, primarily, but not exhaustive, to facilitate economic growth, infrastructure provision, and to maximise the delivery of affordable housing. The Council is therefore proposing to deviate by <u>above</u> the 2011-based principle projections by 3,700 dwellings.</p> <p>The Welsh Government supports the additional technical work and the approach taken by the Council in light of the requirements of PPW (9.2.2) planning positively to maximise economic growth and the delivery of affordable housing. The Welsh Government considers that the Council have addressed our previous objection in terms of the overall level of housing provision and requirement level.</p>
Spatial Strategy	
<p>Omission</p> <p>Objection maintained</p>	<p><u>Spatial Strategy – Policy MG2</u> (WG Deposit Rep B1.d, B1.e)</p> <p>It remains unclear how the strategy and objectives of the plan are reflected in the scale and location of growth. In light of national policy (TAN 6, para 2.2) the authority will need to explain how 1668 dwellings (allocations and windfalls) will enhance or decrease the sustainability of the rural community. The scale of some allocations within</p>

<p>Omission Objection maintained</p> <p>FC33</p> <p>Objection maintained</p>	<p>the minor rural village settlement tier would increase the population by over 50%. Further clarity is sought on the impact of the scale of allocations and how it accords with the sustainability principles within PPW, section 4.7 'sustainable settlement strategy, locating new development'. In addition, the authority should explain how the Local Housing Market Assessment (LHMA) has informed the scale and spatial distribution of sites in the plan.</p> <p><u>Spatial Strategy – Policy MD 6, Development in Minor Rural Settlements</u> (WG Deposit Rep B1.d)</p> <p>The rationale for not including settlement boundaries in minor rural villages requires clarification. The policy intention of MD 6 is unclear and contains vague criteria that could potentially allow further development above the proposed allocations and windfall allowance. There is also an inconsistent approach between policy MD5 and MD6. Whilst MD5 defines 'rounding off' as no more than five dwellings, there is no definition of 'infilling of limited small scale extensions' (para 7.29) in the reason justification of policy MD6. The Welsh Government considers the policy approach could potentially allow too much additional flexibility to those settlements that already have a large amount of development proposed. The policy approach needs to be strengthened to ensure development will be delivered in line with the plans objectives and the spatial strategy. Settlement boundaries or a 'numerical cap' may be appropriate. Robust monitoring should be incorporated to ensure this is achieved.</p> <p><u>Spatial Strategy – Policy MD 5, Development in Key, Service and Primary Settlements</u> (WG Deposit Rep B1.d)</p> <p>The policy intention of policy MD5 is unclear. The policy text states that 'favourable consideration will be given...to <u>small scale affordable housing</u> development which constitutes the "rounding off the edge of settlement boundaries" However, the reasoned justification states that "development will only be permitted outside of the identified settlement boundaries where it consists of <u>either</u> a small scale rounding off of the settlement boundary <u>or</u> for affordable housing" It appears from the reasoned justification that market housing which constitutes 'rounding off' could be permitted outside of settlement boundaries. The policy approach requires clarification.</p>
<p>Housing – Delivery and Implementation</p>	
<p>FC 12</p> <p>Objection partially addressed</p>	<p><u>Flexibility Allowance</u> (WG Deposit Rep B1.b)</p> <p>FC12 increases the level of flexibility in the LDP from 5% to 10% in Policy MG1. The Welsh Government does not object to the principle of a 10% flexibility allowance. The WG has indicated that a notional flexibility allowance of 10% may be appropriate to allow for uncertainty in the delivery of sites and unforeseen issues. Whilst we support the aspirations of the strategy to deliver the level of growth and employment opportunities issues regarding the timing, phasing and deliverability of housing allocations remain. In particular the Welsh Government remains concerned of the numerous development constraints, the potential impact of the Council's restrictive phasing policy and the effects on housing delivery and five year land supply.</p> <p>The Welsh Government seeks clarification that there is sufficient flexibility throughout the entire plan period, in order to ensure sites come forward as anticipated and to ensure a five year land supply can be maintained. We elaborate on these matters below.</p>

<p>FC3 FC12 Omission</p> <p><u>Objection maintained</u></p>	<p><u>Phasing of Housing Sites (Policy MG1)</u> (WG Deposit Rep B2.b)</p> <p>The LDP continues to control phasing in three 5 years tranches, with priority given to brownfield allocations and those that deliver key infrastructure. No focussed changes are proposed to address our previous objection on this matter.</p> <p>We object to MG1 on the basis that the rationale for controlling the phasing of sites in favour of brownfield land is not clearly justified. The 2014 Joint Housing Land Availability Study shows that only 449 units have been completed in the period 2011-2014. The Councils own phasing requirements for the period 2011-2016 (2528 units) would require an average annual build rate of 505 units. On this basis there already appears to be a shortfall of 1067 units in the first three years of the plan. This raises potential implications for the later phases of the plan, where build rates would need to increase above the current identified levels (2011-2016 – 500 p/a, 2016-2021- 800 p/a, 2021-2026, 680 p/a) to deliver the necessary growth.</p> <p>In summary, the policy approach is unnecessary, is not in compliance with national policy (PPW para 2.4) and will further compound issues of housing land and supply.</p>
<p>FC12 FC 13 FC 15 FC 57</p> <p><u>Objection addressed</u></p>	<p><u>Reserve Site, Land at Swanbridge Road</u> (WG Deposit Rep B2.b)</p> <p>The Welsh Government supports FC15 to remove the ‘reserve site’ status of Swanbridge Road, Sully. Land at Swanbridge Road is scheduled to be phased in the second and third phases of the plan. However, as previously stated the authority need to demonstrate that there is sufficient flexibility over the entire plan period to deal with unforeseen issues and ensure a five year land supply can be maintained.</p>
<p>FC3</p> <p>Minor Changes – Appendix 5 Deposit Plan Various</p> <p><u>Objection Maintained</u></p>	<p><u>Housing Sites - Infrastructure Delivery</u> (WG Deposit Rep B2.a, B2. B, B2.c, B2. f)</p> <p>The Welsh Government in its Deposit representation made various comments in respect of general deliverability concerns linked to infrastructure delivery which in the majority of cases is reliant on private sector investment. We note that Council has produced various updated viability and infrastructure studies: 1) Infrastructure and Site Delivery Statement (2015); 2) Statement of Common Ground Welsh Water (2015); 3) Affordable Housing Viability Study (2015)</p> <p>The Welsh Government is generally supportive of the additional work which adds some clarity in terms of constraints, funding mechanisms and viability. However, it appears that many of the sites are dependent on significant infrastructure improvements which have not been costed and could adversely affect viability. For example, a ‘Grampian condition’ on housing development in Cowbridge exists until March 2018 when the Waste Water Treatment Works upgrade is completed. In addition there are schemes that are not identified in the current AMP 6 programme (2015-2020), and development would need to fund improvements up-front. Infrastructure delivery becomes more uncertain in the latter part of the plan period where AMP 7 (2020-2015) improvements are not yet identified.</p> <p>The Council should clarify how sites with planning permission, under construction and completions are delivered, supported by appropriate infrastructure. A housing trajectory would assist all parties to understand and consider the ability of sites contained in the plan to be delivered is achievable, taking account of all constraints.</p>

Affordable Housing	
<p>FC16 FC17</p> <p>Objections partially addressed</p>	<p><u>Affordable Housing: Target / Affordable Housing Viability Work - Sprinklers</u> (WG Deposit Rep C.c, C.d)</p> <p>We note the Council has produced an updated Affordable Housing Viability Study (AHVS). The Welsh Government supports a local authority maximising affordable housing delivery, provided it is supported by robust evidence.</p> <p>The Welsh Government supports the removal of the word ‘minimum’ from the policy and the inclusion of a reference to viability negotiations within the policy. However, it is disappointing that the updated AHVS study has not tested the impact on affordable housing viability of estimated costs of the announced changes to Building Regulations Part L, including changes to domestic fire safety measures (sprinklers). On this basis our objection remains.</p> <p>We note that the AHVS suggests there is a substantial viability margin in most areas in the Vale of Glamorgan, excluding Barry. While the AHVS update points towards a substantial improvement in the Barry area since the previous AHVS was undertaken, the Welsh Government considers the viability work has not been translated into the policy target. The viability work indicates that the target should be 25%, not 30%. In addition, if ‘sprinklers’ were included with the AHVS this could impact significantly in the Barry market area. The authority should also explain how the 30-35dph density assumption in the Barry area would be indicative of the types of sites allocated in the plan.</p> <p>In summary the Welsh Government considers the Council need to explain the impacts of ‘sprinklers’ on the viability, in particular the impact on viability in the Barry area. All components of viability evidence need to be justified by the local authority and discussed through the examination.</p>
<p>FC16 FC17</p> <p>Objection maintained</p>	<p><u>Affordable Housing: Commuted Sums</u> - (WG Deposit Rep C.b)</p> <p>The Welsh Government supports the use of commuted sums, where appropriate, in order to maximise affordable housing delivery. Reference to commuted sums and what thresholds they apply to should be included in the policy, not the reasoned justification. The text within amended para 6.31 (previously 6.33) should be translated into the policy.</p> <p>In addition, Policy MG4 refers to SPG. What is the status of this SPG? When will it be adopted? Is it required to effectively implement the policy?</p>
Gypsy and Traveller Provision	
<p>FC18</p> <p>Objection partially addressed</p>	<p><u>Gypsy & Traveller Provision</u> - (WG Deposit Rep B3.a, B3c)</p> <p>The Gypsy and Traveller provisions of the Housing (Wales) Act 2014, except sections 103 and 104, came into effect on 25 February 2015 supported by new guidance. The Act now contains a broader definition of the Gypsy and Traveller community. The Council should clarify how the evidence base and identified level of need relates to the definition within the Housing (Wales) Act 2014. The reasoned justification should also be amended to reflect the appropriate legislation.</p> <p>FC 18 clarifies that the proposed allocation is of sufficient size to accommodate the need for permanent pitches for the whole plan period, this is supported. However, reference should be made in Policy MG5 to clarify how many pitches are being proposed at Hayes Road, Sully in order to provide clarity and certainty in the plan.</p>

<p>FC61</p> <p>Objection maintained</p> <p>Omission</p> <p>Objection maintained</p>	<p>In respect of transit provision, no focussed changes are proposed to clarify what the level of need is for the Vale of Glamorgan. The evidence is unclear as to whether the 10 pitches are specific to the Vale of Glamorgan or indeed when the pitches would be required over the plan period. This needs further explanation. The plan should make provision for the identified need, where there is evidence of a need.</p> <p><u>Policy MG5 Land at Hayes Road Sully – Suitability and Deliverability (WG Deposit Rep B3.b)</u></p> <p>The allocation Hayes Road Sully for 18 pitches is partially in the C2 flood plain as per the current DAM Maps (January 2015). It is unclear how the proposed allocation accords with national policy in this respect. In addition, Welsh Government Circular 30/2007 ‘Planning for Gypsies & Travellers’ paragraph 19 states that flooding should be a consideration when assessing site suitability, it states “not locating sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans”. Flood Risk in respect of access and egress is a key consideration of nationally policy. The Welsh Government considers that the plan should demonstrate that the area has sufficient capacity to accommodate the stated use and scale to avoid conflict with regard to flood risk.</p> <p>In addition, having a monitoring trigger to deliver a site by 2021 (PT23) is not appropriate. The Council have stated that the need is ‘immediate’. It is vitally important that the LDP makes a clear commitment to deliver level of need in the necessary.</p> <p><u>MD18 Gypsy and Traveller Accommodation Criteria Based Policy - (WG Deposit Rep C2)</u></p> <p>No focussed changes are proposed to address our objections in respect of Policy MD18.</p>
<p>Community Infrastructure Levy / Planning Obligations</p>	
<p>FC31 FC32</p> <p>Objection partially addressed</p>	<p><u>Policy MD4 Community Infrastructure & Planning Obligations & Infrastructure Delivery (WG Deposit Rep B2.d)</u></p> <p>The Welsh Government supports FC31 which includes a reference to viability negotiations within Policy MD4. In respect of the infrastructure requirements listed within the policy, the local authority should be able to explain how they relate to LDP priorities, delivering against the key issues and objectives of the plan.</p> <p>We note that the authority intend to produce a CIL charge. However, it would not be prudent at this point in time to pre-empt a CIL charge (as set out in Policy MD4) due to the necessity to demonstrate there is a funding gap initially which provides the rationale for a CIL charge (if applicable), supported by the CIL Regulations. The essential point is to ensure that no ‘double charging’ takes place. The policy should be reworded to remove the reference to CIL as it is a statement of intent and not policy.</p> <p>Appendices in the Draft Infrastructure Plan (SD65) list site-specific infrastructure together with the wider range of services and facilities required through CIL. Whilst the Council appears satisfied that delivery of identified infrastructure would not be inhibited before CIL adoption (SD25, paragraph 4.2), the Council should be certain that without a CIL charge in place and an inability to ‘pool’ future S106 agreements (beyond 5 per specific infrastructure item), the delivery of sites and key infrastructure will not be inhibited.</p> <p>For example, the new Northern Access Road (NAR) allocated in Policy SP 7(2) is considered essential to facilitate development at the Enterprise Zone and deliver</p>

	<p>economic benefits to the Vale of Glamorgan and the wider region (LDP, paragraph 6.109). Appendix 2 of the Draft Infrastructure Plan (SD65) identifies that the NAR will be provided from 2016-2020 and will be funded by private developers as part of the housing and Enterprise Zone proposals. The Council should explain how key infrastructure will be delivered in light of S106 pooling limitations before a CIL charge is in place (estimated 2017) given (a) the phasing of some housing allocations in Llantwit Major and St. Athan post 2021 (b) the slow take-up and long lead-in times at St. Athan-Cardiff Airport Enterprise Zone and (c) necessary upgrades to the sewerage network.</p> <p>The Council should be certain that key infrastructure is deliverable to bring forward regional employment sites and phased housing allocations within the identified timescale.</p>
Employment	
<p>FC6</p> <p>Objection addressed</p>	<p><u>Strategic Employment Land Provision / MG 9 Employment Allocations- (WG Deposit Rep B4.a)</u></p> <p>The Welsh Government is generally supportive of FC6 and the detailed work (Employment Land and Premises Study - May 2015) undertaken by the authority to align employment land take-up on allocated sites with job numbers (local and regional) and the projected number of households to service employment on these sites. We note that FC6 has reduced the job target by approximately 4,400 jobs from a range of 12,000-15,000 to 7,610-10,610 resulting in 76% of new housing allocations servicing employment on allocated B-Class sites. The detailed work underpinning these figures will be discussed in detail at the Examination.</p>
<p>FC20 FC62</p> <p>Objection maintained</p>	<p><u>Local Employment Land Provision - Policy MG9 - (WG Deposit Rep B4.b)</u></p> <p>The Welsh Government maintains its objection to the calculation of employment land provision. The Employment Land and Premises Study (2013) calculates take-up over a 17-year period (1996-2013) resulting in a requirement for 39.75 hectares of employment land over the plan period, an annual average of 2.65 hectares (Table 37). The calculation of historic land-take should not include the first 2-years of the plan period from 2011-2013. Land-take from 1996-2011 would result in a requirement for 60 hectares of employment land over the plan period (including a 5-year buffer) an average of 3 hectares per annum. It is crucial the LDP allocates land to meet forecasted growth over the plan period to deliver on job targets. In addition there are calculation inconsistencies that need to be addressed. For example, allocation MG 9.7-Hayes Road, does not reflect the 2 hectare buffer zone at the coastal fringe, which reduces the developable area to 5.5 hectares. It is important that net employment totals in Policy MG 9 reflect the developable areas of employment sites.</p>
<p>FC1</p> <p>Objection partially addressed</p>	<p><u>Spatial Distribution of Employment Land - (WG Deposit Rep B4.c) / Protection/Safeguarding of Employment Land and Premises- (WG Deposit Category D)</u></p> <p>The Welsh Government is generally supportive of the approach in FC1, which amends the text of paragraph 4.13 to emphasise the functional importance of Barry Docks. However, the Council should consider a new policy in the plan specific to Barry Docks that would reflect its safeguarding and strengthen the County Borough's economic base.</p> <p>The Employment Land and Premises Study (2013) recognises the scarcity of a range and choice of readily available employment land and the domination of supply in the urban area of Barry/Sully and rural Llandow (paragraph 10.19). Consequently, there is a strong justification for the protection of existing employment sites across the County Borough, particularly those in the Service Centre Settlements that are devoid of</p>

<p>FC5 FC65</p>	<p>employment allocations. Therefore, the Council should include a new policy in the plan that lists existing employment sites for safeguarding of B-Class uses. The list of employment sites is identified in Table 38 of the Employment Land and Premises Study (2013).</p> <p><u>Deliverability of Local and Strategic Employment Sites (Policy SP5, MG9)- (WG Deposit Rep B4.d)</u></p> <p>The Welsh Government through its Deposit Representation highlighted various constraints that could affect the timing, viability and developable area of strategic and local allocations, albeit some are at a greater risk than others. Given the myriad of physical constraints identified, the Council should evidence delivery of all employment allocations in order to hit targeted job growth and support the delivery of new homes.</p>
<p>Waste</p>	
<p>FC7 FC8</p> <p>No previous objection. Comments made in light of updated WG Policy.</p>	<p>We support FC7 and FC8, which removes reference to land-take for waste management facilities in revoked Regional Waste Plans (RWP). However, to comply with paragraph 4.2 of TAN 21, Policy SP8 should require a Waste Planning Assessment to be submitted with all applications for a waste facility.</p> <p>The Council should consider an additional criteria-based policy to assess applications for waste uses and identify the type of facility acceptable on recognised employment sites (TAN 21, paragraph 3.22).</p>
<p>Flood Risk</p>	
<p>Objection maintained</p>	<p><u>Flood Risk- (WG Deposit Rep B2.e)</u></p> <p>The Welsh Government considers that the LDP policy framework should be amended and strengthened to better reflect national planning policy in respect of flood risk, as set out in PPW (section 13.3) and TAN15 'Development and Flood Risk'. This is particularly pertinent in TAN 15 (paragraph 10.8) which states that sites in Zone C2 should not be allocated for highly vulnerable development; the thrust of national policy is to avoid such areas rather than mitigate and then continue; this should be clearly articulated in Policy MD1. The policy(s) and supporting text should also be amended to align with the requirements of section 13.3 in PPW and reflect the acceptability and justification tests of TAN15.</p> <p>In addition there are various sites listed below that are partly located in the Zone C2 flood plain. The LPA should demonstrate that it has complied with national policy and that all the sites/allocations can accommodate the scale of growth proposed and are deliverable within the plan period.</p> <ul style="list-style-type: none"> • MG5 Land at Hayes Road Sully • MG2(1) Phase 2 Barry Waterfront • MG2(5) Land to the east of Eglwys Brewis • MG2(6) Land adjacent to Froglands Farm, Llantwit Major • MG2(7) Land between new Northern Access Road and Eglwys Brewis Road
<p>Best and Most Versatile (BMV) Agricultural Land</p>	
<p>Objection maintained</p>	<p><u>Best and Most Versatile (BMV) Agricultural Land (WG Deposit Rep C.4)</u></p> <p>The Welsh Government note the Council has prepared a new background paper which is supported, and aids the understanding of the scale and location allocated affected. However, further clarification is required of how the scale of loss has been justified</p>

	<p>in accordance with PPW (para 4.10), the Sustainability Appraisal, strategy and key objectives of the plan. In addition, clarification is required to determine if the scale and location of windfall development (set out by settlement tier within the Open Space Background Paper, 2013) has been assessed against the potential impact on BMV land.</p> <p>The Welsh Government considers that the LDP should be amended to better reflect national planning policy in respect of development and agricultural land. National policy states that in LDP policies, considerable weight should be given to protecting such land from development PPW 4.10.1. The LDP does not contain a policy framework to consider ‘windfall development’ for BMV land, except for that relating to Minerals, Policy MG23. A new criterion could be included within policy MD1 ‘Location of New Development’, supported by a reference in the reasoned justification to the background paper ‘Agricultural Land Classification’ 2015.</p>
Biodiversity	
FC38	<u>Policy MD10 – Promoting Biodiversity</u> (WG Deposit Rep Category D)
Objection addressed	The Welsh Government is generally supportive of the amendment to Policy MD10 which removes the wording “where possible” from the policy which reflects its aim and does not restrict the policy to particular types of development.
Minerals	
FC10	<u>Minerals calculation of aggregate hard rock land bank</u> (WG Deposit Rep B5. b, B5.c)
Objection Maintained	<p>It is unclear how the authority has calculated an aggregate land bank of hard rock reserves of 33.5 million tonnes. This calculation is significantly higher than that undertaken for the Regional Technical Statement 1st Review (endorsed August 2014), which calculated the Vale of Glamorgan as having permitted reserves of 13.7 million tonnes (at December 2010).</p> <p>The RTS 1st Review states that the total apportionment for the Vale of Glamorgan calculated over a 25 year period was 27.25 million tonnes of crushed rock. This result is a shortfall of 13.55 million tonnes which will need to be addressed by new allocations identified in the LDP. The authority states that since December 2010, permission has been granted for an extension to Forest Wood Quarry, but the additional reserve contributed by this permission has not been quantified. Further clarity is required on the assessment of aggregate landbank undertaken by Carmarthenshire County Council, highlighting areas where the calculation differs to that undertaken and endorsed by both the authority and Welsh Government in the RTS 1st Review.</p>
FC24	<u>Allocations in Mineral Safeguarding Areas</u> (WG Deposit Rep B5.a, B5.d)
Objection addressed	The amendment by FC 24 to policy MG20 Development in Minerals Safeguarding Areas is supported. Our deposit representation B5d is addressed.
FC26	FC 26 states that the Council has considered the impact of LDP allocations on the mineral resource. We seek further evidence to demonstrate how the authority has applied the criteria in Policy MG20 ‘Development in Minerals Safeguarding Areas’ to several housing and employment sites within category 1 and 2 safeguarding areas and whether prior extraction is required.
Objection Maintained	

Renewable Energy	
MC5	<p><u>Renewable Energy Target / Policy MD19 – Low Carbon and Renewable Energy Generation - (WG Deposit Rep Category D)</u></p> <p>We support the addition of a target for renewable energy generation; however, it is unclear whether the target of 20% relates to renewable energy generation in totality, or, renewable electricity generation only (not including renewable heat potential). Further clarity is required why the authority has not counted the identified 15.29MW of wind power potential capacity towards the overall renewable energy potential (doc SD53, page 36), nor assessed the contribution that could be made by solar energy, given that solar energy has been counted as an existing renewable energy generator (SD53, table 4).</p> <p>In order to support the identified renewable energy target, the authority should strengthen the policy framework to guide appropriate development. At present, the criteria in policy MD 19 is vague and would benefit from further clarity. The authority should separate out policy requirements relating to small scale and larger scale energy proposals. Locations identified in the Renewable Energy Assessment (SD53) as potentially viable for renewable energy technologies should be identified spatially in the LDP. It is noted that the areas identified for potential wind energy differ in the Renewable Energy Study (SD52, page 17) and the Renewable Energy Assessment (SD53 page 23) and it would be helpful if the authority could clarify why these differ.</p>
Monitoring Framework	
Various	<p>The Monitoring Framework needs to be sufficiently clear and sensitive to ensure the plan is delivered. A transparent and comprehensive monitoring framework should be an integral part of an LDP. Currently, the LDP monitoring framework has shortcomings regarding ranges being too extensive, a lack of trigger points and unspecified actions to redress matters The Welsh Government is prepared to work the local authority to improve the monitoring framework.</p>