

LDP / RLDP Consultation Response

St Athan Church Farm

Topic: Wastewater Infrastructure Capacity and Compliance

Plan: Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021–2036

Representation Type: Soundness Representation – Plan Not Sound Unless Changed

1. Summary of Representation

This response raises serious concerns regarding the adequacy, legality, and environmental compliance of wastewater treatment infrastructure across the Vale of Glamorgan, and the implications for delivering new housing allocations within the RLDP (2021–2036). Reports, including representations from Dwr Cymru indicate that over 50 sewage treatment plants may be operating unlawfully, with untreated sewage reportedly being released into the sea. These concerns must be addressed before permitting additional growth. The RLDP requires adequate supporting infrastructure, meaning the plan is not currently sound under tests of effectiveness, deliverability, and environmental protection.

2. Policy Context

The Vale of Glamorgan Council's planning policy framework confirms that the RLDP guides where new development will occur and mandates appropriate infrastructure, including wastewater treatment. The Integrated Sustainability Appraisal (ISA) evaluates impacts on water, natural resources and pollution. The Deposit RLDP sets out land allocations for new housing and is subject to public consultation (Jan–Mar 2026).

3. Evidence of Wastewater Treatment Concerns

Reports indicate that more than 50 sewage treatment plants in the Vale may be failing to meet their legal discharge conditions, potentially releasing untreated sewage into the sea. This poses risks to public health, marine ecosystems, environmental permitting compliance, and overall infrastructure capacity.

West Aberthaw According to publicly available monitoring data, the West Aberthaw WWTW has a significant recent history of spills. The most recent site specific figures published for 2023 report:

- 88 spills during the year

- A total of 1,372.7 hours of untreated sewage discharged into the Bristol Channel Inner North

These figures follow similarly concerning records for 2022, which reported:

- 30 spills
- 364 hours of discharge

4. Implications for New Housing Allocations in the RLDP

If wastewater systems are already non-compliant or over capacity, allocating further housing becomes undeliverable and environmentally unsafe. The ISA objectives to protect water quality and health are undermined. Delays in delivering sites under the previous LDP highlight the consequences of infrastructure constraints.

5. Requested Changes to the RLDP

To make the plan sound, the Council must:

- (1) commission an independent wastewater compliance review,
- (2) integrate findings into the RLDP evidence base,
- (3) add a policy requiring demonstrated wastewater capacity before permitting development, and
- (4) assess environmental risks tied to unlawful sewage discharges.

In addition, Ofwat has recently expanded formal investigations into all wastewater companies operating in England and Wales—including Dŵr Cymru Welsh Water—over concerns regarding potentially unlawful sewage discharges. While this does not attribute illegality to West Aberthaw specifically, it does underscore the seriousness of compliance failures across the sector and the need for clear accountability.

6. Conclusion

Until wastewater treatment compliance issues are resolved, the RLDP's proposed housing growth is not justified or deliverable. The plan should not progress without independent review, evidence-based adjustments to allocations, and strong policy safeguards linking development to legal and environmental wastewater capacity.