

Deposit RLDP 2021–2036 Consultation Submission
Representation relating to St. Athan Ward

Respondent Details

Cllr Stephen Haines

Ward Member, Saint Athan

Ward: St. Athan (including Flemingston)

Representation Type: Objection (in part) / Modification Sought

1. Section of Plan to which this Representation Relates

- Sustainable Growth Strategy
 - Key Housing Sites:
 - KS4 – Land at Church Farm, St. Athan (532 dwellings)
 - KS5 – Land to the West of St. Athan (600 dwellings)
 - Housing Allocations:
 - HG1(7) – Former Stadium Site, adjacent to Burley Place (80 dwellings)
 - HG1(8) – Clive Road, St. Athan (51 dwellings)
 - Transport Policy (TR)
 - Community Infrastructure Policy (CI)
 - Policy SP13 – Infrastructure Provision
 - Green Infrastructure Policies
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2. Summary of Representation

This representation raises concerns regarding:

1. The scale of housing growth in St. Athan.
2. The absence of guaranteed sustainable transport infrastructure.
3. Insufficient retail and community infrastructure provision, particularly within the ward of Flemingston.

4. The allocation of the Clive Road site (HG1(8)), which currently functions as a de facto village green.
5. The cumulative infrastructure impact of candidate and legacy site allocations.

The representation seeks modifications to ensure the Plan is infrastructure-led, deliverable, and compliant with national planning policy and the Well-being of Future Generations (Wales) Act 2015.

3. Scale of Housing Growth in St. Athan

The RLDP allocates:

- KS4 – 532 dwellings
- KS5 – 600 dwellings
- HG1(7) – 80 dwellings
- HG1(8) – 51 dwellings

This equates to **1,263 dwellings in St. Athan.**

This represents a very significant expansion of the settlement and must be assessed against:

- Existing infrastructure capacity
- Transport provision
- Education and healthcare availability
- Retail and service provision

At present, St. Athan does not have a rail station and relies heavily on private car travel.

The Plan must demonstrate clearly that this level of growth is proportionate and deliverable.

4. Transport Infrastructure and Deliverability

The RLDP safeguards land for a “transport interchange” at St. Athan. However:

- There is no confirmed rail station.
- There is no confirmed funding package.
- There is no defined delivery programme.

- There are no binding occupation triggers linking housing delivery to transport delivery.

Previous references in planning documents referred to a railway station. The revised terminology of “transport interchange” reflects uncertainty.

Under **Future Wales – The National Plan 2040**, growth within the South East National Growth Area should align with sustainable transport infrastructure. Without guaranteed rail provision, development risks being car-dependent and inconsistent with decarbonisation objectives.

This raises concerns under the soundness test: *Will the plan deliver?*

5. Retail and Local Service Provision – Flemingston Ward

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.

Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:

- No corresponding neighbourhood retail allocation.
- No clear commitment to small-scale convenience retail within walking distance of new development.
- No spatial recognition of Flemingston’s service deficit.

This is inconsistent with Planning Policy Wales placemaking principles, which require:

- Mixed-use neighbourhoods.
- Walkable access to daily services.
- Reduced reliance on private vehicles.

Without provision of much-needed retail units within Flemingston ward, residents will remain dependent on car travel for everyday needs.

Modification is therefore sought to require neighbourhood retail and service provision proportionate to housing growth.

6. Clive Road Site (HG1(8)) – Community Function

The Clive Road site (HG1(8), 51 dwellings) currently functions as a **de facto village green**.

Although not formally designated, it is:

- Used informally for recreation.
- A visual open space within the settlement.
- A valued community amenity.

Its allocation for housing would result in:

- Loss of accessible informal open space.
- Erosion of community character.
- Reduction in green infrastructure connectivity.

The Plan should:

- Reassess the allocation in light of its community use; or
- Require equivalent or superior replacement open space within immediate proximity prior to development.

This matter engages Policy on Open Space and Green Infrastructure and must be considered in accordance with the prevention and long-term principles of the Well-being Act.

7. Candidate and Legacy Sites – Cumulative Impact

Several allocations in St. Athan arise from:

- The Candidate Site process.
- Rolled-forward legacy allocations.

Individually, smaller sites may appear acceptable. However, cumulatively they produce substantial growth in a settlement with constrained infrastructure.

The Plan must demonstrate:

- Why these sites were preferred over alternatives.
- That lower growth options were robustly assessed.
- That greenfield loss is justified and mitigated.

8. Infrastructure and Phasing Concerns

Policy SP13 refers to securing infrastructure through planning obligations. However, reliance on financial contributions alone does not ensure timely delivery.

There is insufficient clarity regarding:

- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

Infrastructure must be delivered ahead of, or in tandem with, housing occupation — not retrospectively.

9. Compliance with the Five Ways of Working

Long-Term:

Irreversible greenfield expansion without secured sustainable transport risks embedding long-term car dependency.

Prevention:

Without infrastructure-first sequencing, congestion and service strain are foreseeable.

Integration:

Housing growth appears to run ahead of confirmed transport and retail provision.

Collaboration:

The Plan should demonstrate binding commitments from transport and infrastructure partners.

Involvement:

Community concerns regarding scale and open space loss must be properly addressed.

10. Modifications Sought

To ensure soundness and compliance with national policy, the following modifications are requested:

1. Phasing Policy for KS4 and KS5

Introduce clear occupation thresholds tied to delivery of:

- Transport interchange infrastructure.
- Highway mitigation.

- Education capacity.
 - Healthcare provision.
 - 2. Retail Provision Requirement**
Require neighbourhood retail and service provision within the ward of Flemingston proportionate to allocated and previous housing growth.
 - 3. Clive Road Site Review (HG1(8))**
Either:
 - Remove the allocation; or
 - Require replacement open space of equal or greater quality delivered prior to development.
 - 4. Strengthened Infrastructure-First Wording**
Amend Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.
 - 5. Monitoring Framework Enhancement**
Include specific indicators for:
 - Sustainable transport modal share.
 - Retail provision delivery.
 - Open space replacement.
 - Infrastructure phasing compliance.
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11. Conclusion

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

Without modification, the Plan risks:

- Car-dependent growth,
- Loss of valued open space,
- Insufficient local retail provision,
- Pressure on community infrastructure.

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