



For Office use only

Representor No.

Date Received.....

Date of Acknowledgement

Vale of Glamorgan Replacement Local Development Plan 2021-2036

DEPOSIT PLAN CONSULTATION

Public Consultation Representation Form

The Council is seeking your views on the Replacement Local Development Plan (RLDP) **Deposit Plan**. The Deposit Plan is the next formal stage in the development plan preparation process and expands on the Preferred Strategy which the Council consulted on in December 2023 – February 2024.

The Deposit Plan is the full draft version of the RLDP, detailing the **overall strategy, development policies, land designations** (e.g. conservation) and **specific land allocations** for development (including new housing and employment sites) over the 15-year period 2021-2036.

The public consultation will run for 6 weeks between **Wednesday 28th January 2026 and Wednesday 11th March 2026**. Representations received after this time will not be considered.

Full details of the consultation are available on the Council's website at: www.valeofglamorgan.gov.uk/ldp or by scanning the QR code above.

The Council encourages representations on the Deposit Plan to be made via our **online consultation portal** available at <https://valeofglamorgan.oc2.uk/> however representations submitted using this form will also be accepted.

Representations are welcomed in both Welsh and English and this representation form is available in other formats on request e.g. Welsh, large print.

1: Contact Details

Your / Your Client's Details			Agent's Details (if relevant) *		
Title	Mr		Title		
Name	Andrew Street		Name		
Organisation (If applicable)			Organisation (If applicable)		
Address			Address		
Postcode			Postcode		
Email			Email		
Telephone No.			Telephone No.		
Communication preference: (Please tick)	Email	☒	Communication preference: (Please tick)	Email	☐
	Letter	☐		Letter	☐
Language preference: (Please tick)	English	☒	Language preference: (Please tick)	English	☐
	Welsh	☐		Welsh	☐

*If you are acting as an Agent, please also provide details of person/organisation you are representing (**Note:** you will need to supply a separate form for each person/organisation you are representing).

2: Your Views

QUESTION 1:

What are your thoughts on the Deposit RLDP (e.g. policies, site allocations)?

Please state which site reference, policy or paragraph number your comments refer to. If you are commenting on more than one site, policy or paragraph, please use a separate sheet for each one.

SITE REFERENCE/POLICY/PARAGRAPH NUMBER:

Agree/Support

☐

Disagree/Object

☒

Comment

☐

No Comment

☐

Comments:

See attached additional pages

Please attach additional pages if required.

QUESTION 2: WELSH LANGUAGE

We would like to know your views on the effects that proposals in the Deposit Plan would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. Do you think that there will be any impacts, either positive or negative? Please explain

Yes	☐	No	☐	Don't know	☐	No Comment	☒
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Comments:

Please attach additional pages if required.

IMPORTANT INFORMATION

Thank you for your comments. Following the consultation, the Council will consider the responses and prepare a report of consultation, which will form part of the evidence for the Replacement Local Development Plan.

Completed Representation Forms and any supporting information should be returned to the LDP Team:

BY EMAIL – ldp@valeofglamorgan.gov.uk

ONLINE – By completing the electronic form at <https://valeofglamorgan.oc2.uk/>

BY POST – Planning Policy Team, Vale of Glamorgan Council, Civic Offices, Holton Rd, Barry, CF63 4RU

If you require any further information or have any questions, please contact the LDP Team on 01446 704681 or e mail ldp@valeofglamorgan.gov.uk

Submissions are welcome in either Welsh or English and this representation form is available in other formats on request e.g. Welsh, large print.

How we will use your information

On 25th May 2018 the General Data Protection Regulation (GDPR) came into force, placing new restrictions on how organisations can hold and use your personal data and defining your rights with regard to that data. Any personal information disclosed to us will be processed in accordance with our Privacy Notice. A paper copy of the Council's Privacy Notice can be provided upon request or can be viewed at: https://www.valeofglamorgan.gov.uk/en/our_council/Website-Privacy-Notice.aspx

Data Protection Notice – Please note that all comments received cannot be treated as confidential and once duly reported and considered, will be available for public inspection. We will also hold your contact details on our Replacement LDP Consultation Database for the duration of the RLDP preparation process which will keep you informed of future updates. If you would like to be removed from the database at any time and no longer wish to receive correspondence from the Council on the RLDP, then this can be requested in writing. However, any information provided will be stored safely and retained in accordance with Vale of Glamorgan Council's data retention policy unless it needs to be retained under another lawful basis.

REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN

23:55 ON WEDNESDAY 11th MARCH 2026

REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

Signed:



Date:

11 March 2026

Representation on the Vale of Glamorgan Deposit RLDP 2021–2036

Specific Policy/Site Objection:

- **Policy SP4.4: Land at Church Farm, St Athan**
- **Policy SP4.5: Land to the West of St Athan**
- **Clive Road (Additional Allocation)**
- **Policy EMP2: MOD St Athan / Bro Tathan**

Status: Unsound

1. Introduction

I wish to formally object to the allocation of **the above sites** and the broader designation of St Athan as a "Primary Settlement" for high-density growth within the Replacement Local Development Plan (RLDP). This allocation fails the **Test of Soundness** regarding **Consistency** (with national climate goals) and **Effectiveness** (deliverability of infrastructure).

2. Failure of Sustainable Transport (Policy SP7 & SP10)

The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations of **Policy SP10** is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.

The proposed density at **the above sites** will inevitably lead to an unsustainable increase in private car journeys on the **B4265**, specifically at the **Gileston Road junction** and **Weycock Cross**, which are already at or near capacity.

Concrete infrastructure is needed to be in place prior to any development of the land. Often intentions of infrastructure are not progressed. In addition where infrastructure is not in place prior to housing many commuters will become accustomed to travel by car and won't switch to public transport. It is difficult to see how developments work with **Future Wales: The National Plan 2040**

Active travel should look at linking key destinations and with the western vale being spread over longer distances more effort should be given to linking population centres with separated bicycle paths and wide accessible pavements. Shared bike / foot paths are inherently dangerous not allowing the safe use of wheelchairs and prams and sufficient use for children and dog walkers. Cycling should not have to stop at every intersection which creates visibility black spots by the way they turn away from traffic.

With current planned housing and that of additional housing in the LDP creating over 1,000 new homes and with each household having 1-2 cars per household this will add significant additional numbers of journeys on already poor road infrastructure. The vale lacks sufficient north / south routes pushing vehicles towards Weycock Cross in Barry which will have its own traffic issues or via Cowbridge with small country lanes. [REDACTED] travelling from St Athan where buses would take over 1 hour 10 minutes and even then not arriving in time to start work. In contrast car travel would be 10 minutes or cycle would be 20 minutes but over dangerous roads.

Travel to Barry for meetings at peak times can take over 50 minutes from St Athan with significant delays leading to Weycock Cross and passed the secondary schools even before developments in the RLDP or existing planning. Public transport gets caught in the same traffic issues.

Access into St Athan is already dangerous from the war memorial with one near fatal accident already having taken place since the 'improvements' to the junction. Proposals for additional access from B4265 onto developed land would be on a hill with poor visibility and around a blind bend. Currently there is poor visibility leaving St Athan due to the side by side two car exit blocking views in both directions along with more visibility issues looking westward due to traffic furniture and signage.

While **Bro Tathan (Policy EMP2)** provides jobs, there is no guarantee that the people moving into local developments will work there. If they commute elsewhere, the RLDP fails its own climate goals (Policy SP1) by creating a "commuter colony" rather than a sustainable community.

Reference **Policy CI3 (New Community Facilities)**. The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions. New access to the school under existing planning is only 'proposed' and existing access to the school via Rock Road is a poorly surfaced and narrow one way road but is often ignored with traffic coming via Rectory Drive which has a 'No entry except for access' restriction but is not enforced causing large numbers of vehicles into residential areas not built for this type of activity.

Speeding is already a great concern in the village with the current level of vehicle traffic with little compliance with the 20mph speed limit and no enforcement.

3. Coalescence and Loss of Settlement Identity (Policy SSC1)

The scale of development proposed for Church Farm, in conjunction with **Policy SP4.5 (Land West of St Athan)**, threatens the distinct character of the village. The erosion of the "Strategic Gap" between St Athan and Eglwys Brewis violates the principles of **Policy SSC1 (Settlement Boundaries)**. This "urban creep" creates a continuous sprawl that permanently destroys the rural setting of the historic Church Farm and the village's unique sense of place.

St Athan should no longer be thought of as a village but as a small town with infrastructure to meet the growing demands of the population and lacks facilities that are given to surrounding towns such as fire / ambulance and police stations.

If the jobs at the Enterprise Zone (Aston Martin, Bro Tathan) do not match the demographic of the new residents, St Athan simply becomes a "dormitory" village, increasing the carbon footprint as people drive to Cardiff or Bridgend for work. In addition people will travel to St Athan from other areas should they be employed at the new commercial sites.

4. Infrastructure Lag and Healthcare Capacity (Policy CI3)

Under **Policy CI3**, development should only proceed where adequate community facilities exist or can be provided. Current primary healthcare services in St Athan and nearby Llantwit Major are already oversubscribed. The RLDP provides no "Triggers for Delivery" to ensure that new medical and educational facilities will be operational *prior* to the occupation of the hundreds of homes planned for the Church Farm site. This creates a significant risk to the wellbeing of both

new and existing residents. Access to both village GP services are on a part time basis. With new dentist rules in Wales, this will increase the need for further travel around the area to meet simple check ups. With no A&E facilities in the county St Athan often falls between Cardiff and Bridgend hospitals and continued poor roads together with additional traffic gives greater concern when emergencies happen.

5. Environmental and Biodiversity Impact (Policy SP5)

The Church Farm site consists of high-quality agricultural land and vital greenfield habitats. While **Policy SP5** mandates a "Net Benefit for Biodiversity," the total loss of soil permeability and ancient hedgerow connectivity on a site of this scale cannot be mitigated by tokenistic landscaping. Once this valuable land is developed it is irretrievably lost for current and future generations. Currently there are red list species using the space like Yellowhammers and Skylarks. In addition there has been a collapse of invertebrate bio-mass over the last 40 years and personally seen since moving the area in 1980. Net Benefit for Biodiversity plans do not address any of these local and national concerns.

Land to the west of St Athan (SP4.5) This site consists of **Grade 2 (Good) or 3a (Excellent)** agricultural land. Under **Planning Policy Wales (PPW) 12**, such land should only be developed if there is an "overriding need" and no lower-grade land is available. The Vale of Glamorgan council has not sufficiently explored brownfield alternatives in the Barry Docks or the St Athan Enterprise Zone. The increased light pollution and "urban glow" will impact the rural character of the Western Vale.

The invertebrate charity Buglife shows that based on citizen science monitoring data, there has been a **75% to 79% decline** in the abundance of flying insects in Wales between 2004 and 2023.

Natural Resources Wales also reported

- **79% Decrease in Flying Insects (2004–2023):** Data from the "Bugs Matter" survey, which counts insect "splats" on vehicle number plates, recorded this 79% reduction in Wales, with 2023 showing further declines from previous years.
- **Specific Invertebrate Declines:** Moths, which are key pollinators, have seen an average decline of **43%** in abundance since 1970.
- **Widespread Biodiversity Loss:** Welsh wildlife has decreased on average by 20% since 1994, and 18% of species in Wales are at risk of extinction.
- **Habitats in Peril:** Over the past 50 years, many insects have suffered declines of 65% to 70% in certain areas, particularly moths, butterflies, ladybirds, and ground beetles.
- **Impact on Food Chain:** Invertebrates that provide food for farmland birds have seen declines of 50-80%.

The cumulative impact of hard-standing surfaces also raises serious concerns regarding surface water runoff into the **River Thaw** catchment area. Significant surface flooding already takes place across the western Vale spilling onto roads causing travel disruption.

An increase in hard surfaces also increases ambient temperatures compared to grassland, woodland and other green spaces necessitating increased power use for cooling and comfortable living temperatures. Building practices can help mitigate this but only where this is incorporated into sustainable building rules.

Replacing green fields (which act as a natural sponge) with hundreds of roofs and driveways at **Church Farm (SP4.4)** and **Land West of St Athan (SP4.5)** will create a "funnel effect."

Dwr Cymru Welsh Water has previously noted concerns regarding the **St Athan Wastewater Treatment Works**. Proof is required that the current system can handle the RLDP's projected flow without increasing overflow events. Further development risks "Combined Sewer Overflows" (CSOs) into local watercourses, which contradicts the Council's **Nature Emergency** declaration.

The Vale of Glamorgan Council requires a **Sustainable Drainage Systems (SuDS) Approval Body (SAB)** review. Attenuation ponds are often poorly maintained and can fail during the "1-in-100-year" storm events which are becoming more frequent.

6. Conclusion

The allocation of **the above site policies** are **unsound**. It promotes car-dependent growth in a rural location without the necessary infrastructure "trigger points" to protect the local environment or the B4265 road network.

Proposed Remedy: Reduce the housing density at the above sites and re-classify St Athan as a "Minor Rural Settlement" until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.