



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			Title	Mr	
Name			Name	Leo Horton-Taylor	
Organisation (If applicable)	BDW Trading Limited		Organisation (If applicable)	Turley	
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:

Policy SP1 – Sustainable Growth Strategy

Policy SP1 sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SP1. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SP1. The number of overall dwellings identified in Policy SP1 will therefore not meet the identified household growth needs of VoG for the RLDP period. The Council should review the position in terms of the updated household projections.

It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SP1 seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SP1 therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.

In order for Policy SP1 to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence.

The Development Plans Manual states:

"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"

Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Please attach additional pages if required.

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:

Policy SP2 – Settlement Hierarchy

The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable.

As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Please attach additional pages if required.

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:

Policy SP4 – Placemaking

We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.

The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses...' or to be developed at 'high densities...and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.

Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:

"Placemaking Statements will be required as part of Design and Access Statements for all..."

Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated.

Taking allocated sites, significant consultation will have already taken place through the LDP process, with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Please attach additional pages if required.

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:

Policy PGD1 – Creating Well Designed and Inclusive Places

There is a degree of crossover and repetition between Policy PGD1 and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Please attach additional pages if required.

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:

Policy PGD2 – Residential Site Densities

It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HG1 KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site / surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Please attach additional pages if required.

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:

Policy SP6 – Housing Requirement

Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SP1).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Please attach additional pages if required.

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:

Policy HS1 – Housing Allocations

We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Please attach additional pages if required.

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:

Policy HG1 KS4 – Land at Church Farm, St Athan

Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class A1 foodstore – as per Paragraph 6.99 of the Deposit Plan. Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.

Policy HG1 KS4 should be amended to read that the site will deliver “approximately 532 homes over the plan period...”.

The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.

The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.

Policy HG1 KS4 also sets out a number of other requirements that the development “must” comply with. We do not support the current wording and use of “must comply with”. Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list ‘requirements’ will be subject to further consideration, and should not be treated as definitive.

For example, the points listed under ‘Sustainable Transport and Highways’ should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity / flow of junctions will be determined through a site-specific Transport Assessment.

The first bullet point under Policy HG1 KS4 should be amended to read:

“A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment”.

As per Policy HG1 KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

Please attach additional pages if required.

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:

(continued) Policy HG1 KS4 – Land at Church Farm, St Athan

The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road / B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.

The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HG1 KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).

Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.

The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum of land expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.

Whilst the principle of transferring land for the redevelopment / expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent of land required. It is also important that Policy HG1 KS4 recognises that the need to provide for / contribute towards education facilities will need to be determined at the point of any future planning application.

If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer of land, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

Please attach additional pages if required.

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:

(continued) Policy HG1 KS4 – Land at Church Farm, St Athan

Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.

The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.

The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.

It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.

The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Please attach additional pages if required.

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:

Policy SP7 – Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SP8.

Please attach additional pages if required.

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:

Policy SP8 – Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Please attach additional pages if required.

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:

Policy TR1 – Transport Proposals

Policy TR1 states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG1 KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Please attach additional pages if required.

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:

Policy SP12 – Retail Floorspace Provision

The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Please attach additional pages if required.

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:

Policy SP13 – Community Infrastructure and Planning Obligations.

We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.

Policy SP13 also states that the delivery of new / improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers / developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Please attach additional pages if required.

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:

Policy CI1 – Open Space Provision

The wording of Policy CI1, and / or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective of local context / needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy CI1 should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.

The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CI1 requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and / or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Please attach additional pages if required.

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:

Policy CI3 – New Community Facilities

Policy CI3 identifies the 'allocation' of land at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required...to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated – whether it is actually within the Primary School and / or adjoining land. If land may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum of land would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan – for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that if land is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Please attach additional pages if required.

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:

Policy CC1 – Residential Operational Net Zero Carbon Development

Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval. Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

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

☒**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:

11.03.2026