
Vale of Glamorgan Replacement Local Development Plan – Deposit Consultation Response

Prepared for:

Hallam Land

Prepared by:

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1. Introduction

- 1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
- 1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.

Background to Representations

- 1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
- 1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.

Approach to Responding to Consultation

- 1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
- 1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
- 1.7. Hallam's representation to this consultation broadly splits into three separate sections:
- It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
 - It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and

- It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.

1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

2. Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)

2.1. Together, these policies have the effect of:

- Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
- Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
- Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).

2.2. Hallam are generally supportive of the aims of these three policies.

2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.

2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.

2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

3. Policy HG1 KS5 (Land to the West of St Athan)

- 3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
- 3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
- 3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
- 3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
- 3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
- 3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.

Site Capacity and Housing Trajectory

- 3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
- 3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.

- 3.9.** In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
- 3.10.** Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
- 3.11.** This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
- 3.12.** Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
- 3.13.** Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.

Affordable Housing

- 3.14.** At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
- 3.15.** Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
- 3.16.** Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.

- 3.17.** Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the “Land South of the B4265, St Athan” (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Station. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.

Sustainable Transport and Highways

- 3.18.** This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
- 3.19.** As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the “Land Between the Railway Line and B4265, St Athan” (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
- 3.20.** With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam’s overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
- 3.21.** At present, Hallam’s view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
- ‘Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage’.*
- 3.22.** Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
- 3.23.** Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam’s site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam’s site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.

- 3.24.** Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.
- 3.25.** Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
- 3.26.** Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:

'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'

Community Infrastructure

- 3.27.** There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
- 3.28.** Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
- 3.29.** Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.

- 3.30.** Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.

Green Infrastructure, Recreation Spaces, and Biodiversity

- 3.31.** The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
- 3.32.** This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
- 3.33.** Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

4. Policy TR1 (Transport Proposals)

- 4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.

St Athan Transport Interchange

- 4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
- 4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of “critical mass” through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW’s ‘Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders’ which confirms that the delivery of St Athan Railway Station remains in TFW’s pipeline which has been endorsed by the Westminster Government.
- 4.4. The location that is identified on the Proposals Map is Transport for Wales’ preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
- 4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
- 4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
- 4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
- 4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.

Gileston Road Junction, St Athan

- 4.9.** Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
- 4.10.** Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
- 4.11.** Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
- 4.12.** To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore the number of vehicle trips that would be generated modest.
- 4.13.** This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

5. Policy CI1 (Open Space Provision)

- 5.1.** This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
- 5.2.** Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
- 5.3.** Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter,

6. Policy CI3 (New Community Facilities)

- 6.1.** As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
- 6.2.** This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
- 6.3.** With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
- 6.4.** Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
- 6.5.** Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
- 6.6.** Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
- 6.7.** Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

7. Policy CC1 (Residential Operational Net Zero Carbon Development)

- 7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
- 7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
- 7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
- 7.4. There are two points to be made by Hallam here:
- 7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
- 7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
- 7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.

- 7.8.** Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
- 7.9.** From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
- 7.10.** As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
- 7.11.** Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
- 7.12.** Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

8. Policy DNP3 (Glamorgan Heritage Coast)

- 8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
- 8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
- 8.3. The relevant extract of the Proposals Map is replicated below:



- 8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
- 8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.

- 8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
- 8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
- 8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
- ‘Through the fieldwork it is considered that the Site does not display any “special environmental qualities” identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.’*
- 8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A

Policy HG1 KS5 (Land to the West of St Athan)

Land West of St Athan, as shown on the Proposals Map, is allocated as a key mixed use site. The 29.6 Ha site comprises two parcels of land that collectively will deliver approximately 600 homes over the plan period, alongside new community and commercial facilities and land safeguarded for the provision of a new station and bus/train interchange at St Athan.

The development of the site must adhere to the Placemaking Principles set out in Policy SP4 Placemaking and the criteria in Policy PGD1 Creating Well Designed Places. In addition, the site must comply with the following requirements:

Affordable Housing

- The provision of a minimum of ~~210 affordable housing units (35%)~~ 35% of homes as affordable with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data. In order to deliver a greater social mix, the affordable units should be dispersed across the site in ~~clusters of no more than 10 units~~, with their delivery being phased across the development trajectory.

Sustainable Transport and Highways

Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage:

- ~~The provision of~~ A contribution towards the delivery of an Active Travel route along the B4265 between the site entrance and the Gileston Road junction to the east.
- Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals), a contribution towards the delivery of an Active Travel route between St Athan and Llantwit Major, if required in planning terms.
- The delivery of a signalised junction on to the B4265 with Active Travel crossing points providing access into both parcels within the site allocation.
- A contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network ~~as informed by the Strategic Transport Assessment and site-specific Transport Assessment.~~
- The provision of (or contribution towards) pedestrian/cycle links to Llantwit Road and pedestrian ~~footway~~ improvements along Llantwit Road where possible.

Safeguarding of land within:

- ~~Safeguarding of land within~~ The smaller parcel to allow for the delivery of a new rail station at St Athan including appropriate car parking to support the use of the site as a bus/rail interchange.

- ~~Safeguarding of land within~~ The site boundary of the larger site to allow for the provision of a pedestrian and cycle bridge to serve a new education facility on land to the south as identified in Policy CI3 (6) Land south of the railway, St Athan.
- Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals), the road layout and width should be of a sufficient width and design to allow for the provision of a loop road to facilitate a bus connection.

Community Infrastructure

- An off-site contribution towards the delivery of additional school places ~~in accordance with~~ subject to capacity requirements within the catchment area.
- The provision of ~~an on-site community building~~ community space to serve the development if there is an identified need for additional community floorspace locally at planning application stage.

Green Infrastructure, Recreation Spaces and Biodiversity

- The extension of St Athan Recreation Ground including the provision of public open space which could include an additional sports pitch, areas of equipped play and community allotments.
- In addition, the site must include a number of other well-designed areas of useable open space, including informal and equipped play spaces, with appropriate green infrastructure connections between them.
- Hedgerows and other green infrastructure assets on the site boundary and within the site should be retained and included as part of green infrastructure corridors through the site wherever possible. Where this cannot be achieved, appropriate compensatory planting will be required.

Flood Risk and Sustainable Drainage

- The site must incorporate appropriate high quality sustainable drainage systems (SuDS) which integrate the surface water drainage function with open space and provide opportunities to deliver biodiversity.
- Built development should avoid the small area of Zone 3 surface water and small watercourses flooding on the eastern periphery of the site.

Heritage

- The development should consider and respond positively to the setting of the listed buildings on Llantwit Road, which are in close proximity to the site boundary.