



Enquiries: Sion Jones/Dewi Griffiths

Sent via email.
March 2026

Dear Sir / Madam

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037

Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.

Settlement boundaries

SSC1 – development within settlement boundaries

We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).

Housing delivery

HG1 - housing allocations

A. Key sites (Policy HG1 KS1-5)

Our representation on the above sites are included in appendix 1.

B. Housing allocations (HG1 (1) to HG1 (9))

Our representation on the above sites are included in appendix 1.

C. Major landbank sites (HG2 (1) to HG2 (5))

These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.

D. Housing led redevelopment opportunity (HG3 (1))

Our representation on the above site is included in appendix 1.

E. Rural affordable housing led sites (HG4 (1) to HG4(4))

Our representations on the above sites are included in appendix 1.

Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.

Gypsy and traveller accommodation (GT)

SP9 - gypsy and traveller site provision

Our representation on the site allocation is included in appendix 1.

Retail, commercial and service centres (RCS)

SP12 - retail floorspace provision

Our representations on the site allocations are included in appendix 2.

Community infrastructure (CI)

SP13 - community infrastructure and planning obligations

We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can be controlled either through planning condition or a commercial agreement between the developer and Welsh Water.

Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.

The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.

Community facilities

CI3 – new community facilities

Our representations on the site allocations are included in appendix 2.

CI5 - cemetery and crematorium provision

Our representation on the site allocation is included in appendix 2.

Productive and enterprising places

SP14 - employment growth

Our representations on the site allocations are included in appendix 2.

We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results

in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.

EMP1 - employment regeneration opportunity areas

Our representations on the site allocations are included in appendix 2.

Climate change and transition towards net zero (CC)

SP16 - climate change mitigation and adaptation

We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.

We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.

SP19 – Green Infrastructure

In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.

Environmental protection

DNP5 – environmental protection

We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.

We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Yours faithfully,

Dewi Griffiths
Development Growth Officer
Developer Services



Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site

Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:

- In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
- Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
- In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
- If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
- Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
- Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

Site Ref	Settlement	Site Name	No of units	Water supply	Wastewater	Wastewater Treatment Works
Key sites						
KS1	Barry	Land at Northwest Barry	376	A hydraulic modelling assessment (HMA) will be required.	A hydraulic modelling assessment (HMA) will be required.	Cog Moors WwTW has capacity to accept foul flows from the proposed development.
KS2	Dinas Powys	North of Dinas Powys	250	A hydraulic modelling assessment (HMA) will be required. An 18" diameter watermain crosses the site.	The sewerage network can accommodate foul flows from the development. A 1450mm diameter foul sewer crosses the site.	Cog Moors WwTW has capacity to accept foul flows from the proposed development.
KS3	Rhoose	Land at Readers Way	520	A hydraulic modelling assessment (HMA) will be required. A 9" diameter watermain crosses the site.	A hydraulic modelling assessment (HMA) will be required. A 150mm diameter foul sewer crosses the site.	Cog Moors WwTW has capacity to accept foul flows from the proposed development.
KS4	St Athan	Land at Church Farm	532	A hydraulic modelling assessment (HMA) will be required.	A hydraulic modelling assessment (HMA) will be required.	Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030, and capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of a scheme at the WwTW.
KS5	St Athan	Land to the west of St Athan	600	A hydraulic modelling assessment (HMA) will be required.	A hydraulic modelling assessment (HMA) will be required.	Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030, and capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of a scheme at the WwTW.
Housing allocations						
HG1(1)	Barry	Land to the west of Pencoedtre Lane	135	The water network can supply the proposed development.	The public sewerage network can accept potential foul flows from this development site.	Cog Moors WwTW has capacity to accept foul flows from the proposed development.

				125mm, 450mm, 10" & 36" diameter watermain cross the site.		
HG1(2)	Barry	Land at the Mole	65	Dwr Cymru Welsh Water has made representations on planning application ref 2023/00051/HYB. A hydraulic modelling assessment (HMA) will be required. A 160mm diameter watermain, and a 3" diameter abandoned watermain cross the site.	Dwr Cymru Welsh Water has made representations on planning application ref 2023/00051/HYB The public sewerage network can accept potential foul flows from this development site. A 1050mm surface water sewer crosses the site.	Dwr Cymru Welsh Water has made representations on planning application ref 2023/00051/HYB. Cog Moors WwTW has capacity to accept foul flows from the proposed development.
HG1(3)	Barry	Land at Hayes Lane	70	Dwr Cymru Welsh Water has made representations on planning application ref 2026/00056/FUL. A hydraulic modelling assessment (HMA) will be required. A 6" diameter watermain and a 6" diameter abandoned watermain cross the site.	Dwr Cymru Welsh Water has made representations on planning application ref 2026/00056/FUL. The public sewerage network can accept potential foul flows from this development site.	Dwr Cymru Welsh Water has made representations on planning application ref 2026/00056/FUL. Cog Moors WwTW has capacity to accept foul flows from the proposed development.
HG1(4)	Barry	Land at Neptune Road	40	A hydraulic modelling assessment (HMA) will be required. A 150mm diameter watermain and 2 x 160mm watermain cross the site.	The public sewerage network can accept potential foul flows from this development site. A 300mm diameter surface water sewer crosses the site.	Cog Moors WwTW has capacity to accept foul flows from the proposed development.
HG1(5)	Llantwit Major	Land between the Northern Access Road and Eglwys	235	A hydraulic modelling assessment (HMA) will be required.	A hydraulic modelling assessment (HMA) will be required.	Llantwit Major WwTW has capacity to accept foul flows from the proposed development.

		Brewis Road (Site C - Central Parcel)			A 150mm diameter foul sewer crosses the site.	
HG1(6)	Cowbridge	Land adjoining St Athan Road	105	Dwr Cymru Welsh Water has made representations on planning application ref 2022/00958/FUL. A hydraulic modelling assessment (HMA) will be required.	Dwr Cymru Welsh Water has made representations on planning application ref 2022/00958/FUL. The public sewerage network can accept potential foul flows from this development site. A 65mm diameter pressurised rising main sewer crosses the site.	Dwr Cymru Welsh Water has made representations on planning application ref 2022/00958/FUL. Cowbridge WwTW has capacity to accept foul flows from the proposed development.
HG1(7)	St Athan	Former Stadium Site, adjacent to Burley Place	80	Dwr Cymru Welsh Water has made representations on planning application ref 2024/01152/FUL. A hydraulic modelling assessment (HMA) will be required.	Dwr Cymru Welsh Water has made representations on planning application ref 2024/01152/FUL. A hydraulic modelling assessment (HMA) will be required.	Dwr Cymru Welsh Water has made representations on planning application ref 2024/01152/FUL. Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030, and capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of a scheme at the WwTW.
HG1(8)	St Athan	Clive Road	51	A hydraulic modelling assessment (HMA) will be required.	A hydraulic modelling assessment (HMA) will be required. 100mm, 150mm and 225mm diameter foul sewers cross the site.	Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030, and capacity will be available at the WwTW to accommodate foul flows from the proposed allocation upon completion of a scheme at the WwTW.

HG1(9)	Rhoose	Land north of the Railway Line (East)	339	Dwr Cymru Welsh Water has made representations on planning application ref 2022/00733/FUL. A hydraulic modelling assessment (HMA) will be required. A 3" diameter abandoned watermain crosses the site.	Dwr Cymru Welsh Water has made representations on planning application ref 2022/00733/FUL. A hydraulic modelling assessment (HMA) will be required. A 300mm pressurised rising main sewer crosses the site. The site is near to a Sewage Pumping Station (SPS) and we would recommend that the LPA discuss the potential allocation with their Environmental Health Department. To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.	Dwr Cymru Welsh Water has made representations on planning application ref 2022/00733/FUL. Cog Moors WwTW has capacity to accept foul flows from the proposed development.
Housing led redevelopment opportunity						
HG3(1)	Llantwit Major	Former Eagleswell Primary School	72	The water network can supply the proposed development. 110mm diameter watermain crossing the site.	The public sewerage network can accept potential foul flows from this development site. A 225mm diameter foul sewer crosses the site.	Llantwit Major WwTW has capacity to accept foul flows from the proposed development.
Rural affordable housing led sites						
HG4(1)	Colwinston	Land to the East of Colwinston	25	The water network can supply the proposed development.	The public sewerage network can accept potential foul flows from this development site.	Cowbridge WwTW has capacity to accept foul flows from the proposed development.

HG4(2)	Aberthin	Land west of Maendy Road	25	The water network can supply the proposed development.	The public sewerage network can accept potential foul flows from this development site.	Cowbridge WwTW has capacity to accept foul flows from the proposed development.
HG4(3)	Wick	Land at Heol Fain	50	A hydraulic modelling assessment (HMA) will be required.	The public sewerage network can accept potential foul flows from this development site. A 6" diameter abandoned sewer crosses the site. The site is near to a Sewage Pumping Station (SPS) and we would recommend that the LPA discuss the potential allocation with their Environmental Health Department. To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.	Wick WwTW has capacity to accept foul flows from the proposed development.
HG4(4)	Fferm Goch (Llangan area)	Land north of West Winds Business Park	22	The water network can supply the proposed development.	The public sewerage network can accept potential foul flows from this development site. A 150mm diameter foul sewer crosses the site.	Cowbridge WwTW has capacity to accept foul flows from the proposed development.
SP9 Gypsy & Traveller Site						
SP9 (1)	Llangan	Land at Llangan	7 pitches	The nearest watermain is approximately 100 metres from the site.	The nearest sewer is approximately 350 metres from the site.	Penybont Merthyr Mawr is the nearest WwTW catchment to the site.

Appendix 2 - Employment sites & other uses

Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.

The following provisions are applicable to all allocated employment sites:

- the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
- The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
- In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
- Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
- If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

Site	Proposed development	Water Supply	Sewerage	Wastewater Treatment Works (WwTW)
CI3 New community facilities				
1. Land at Clare Gardens, Cowbridge	Education	Dwr Cymru Welsh Water has made representations on planning application ref 2025/01008/RG3.		
2. St Athan Primary School, St Athan	Education	Dwr Cymru Welsh Water has made representations on planning application ref 2025/00991/RG3.		
3. St Richard Gwyn Catholic School, Barry	Education	Dwr Cymru Welsh Water has made representations on planning application ref 2023/00285/RG3.		
4. Lower Cosmeston Farm, Penarth	Education	Dwr Cymru Welsh Water has made representations on planning application ref 2022/01113/RG3.		
5. Upper Cosmeston Farm, Penarth	Education, Community Space	Dwr Cymru Welsh Water has made representations on planning application ref 2020/01170/OUT.		
6. Land south of the railway, St Athan	Safeguarded for potential community use	No watermain crossing the site	No sewers crossing the site	Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030.
CI5 Cemetery & crematorium provision				
Porthkerry Cemetery	Safeguarded for extension	A 3" diameter watermain crosses the site	There are no public sewers close to this site.	N/a
SP12 Retail floorspace provision				
1. Land at Church Farm, St Athan	Convenience retail floorspace	This site is located within the boundary of HG1 KS4 Land at Church Farm.		
2. Land at Bridge House Farm, Llanmaes	Convenience retail floorspace	Dwr Cymru Welsh Water has made representations on planning application ref 2022/00907/FUL.		

SP14 Employment Growth				
1. Land east of Cardiff Airport, Rhoose	Major Employment	3", 100mm, 160mm & 300mm diameter watermain crossing the site.	150mm sewer, 225mm surface water sewer & 250mm diameter pressurised rising main crossing the site. Tredogan Sewage Pumping Station is located within the site, and we would recommend that the LPA discuss the potential allocation with their Environmental Health Department. To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.	The site is in Cog Moors WwTW catchment.
2. Land south of Port Road (Model Farm), Rhoose	Major Employment	4" & 9" diameter watermain crossing the site.	375mm diameter foul sewer, and a 100mm diameter pressurised rising main sewer crossing the site.	The site is in Cog Moors WwTW catchment.
3. Bro Tathan Aerospace and Business Park, St Athan	Major Employment	90mm diameter watermain crosses the site.	150mm & 300mm diameter foul sewers, and 100mm & 125mm pressurised rising main sewers crossing the site.	The site is between Llantwit Major & West Aberthaw WwTW catchments
4. Land to the South of Junction 34 of the M4, Hensol	Major Employment	450mm diameter watermain crossing the site.	750mm diameter foul sewer crossing the site.	The site is in Coslech WwTW catchment.

5. Atlantic Trading Estate, Barry	Local Employment	No watermains crossing the site.	North parcel – 375mm, 1050mm diameter foul sewers, and Combined Sewer Overflow and 825mm diameter outfall pipe crossing the site. South parcel – 150mm diameter foul sewer crossing the site.	The site is in Cog Moors WwTW catchment.
6. Windmill Park, Hayes Road, Barry	Local Employment	No watermains crossing the site.	225mm diameter foul sewer crossing the site.	The site is in Cog Moors WwTW catchment.
7. Vale Business Park, Llandow	Local Employment	No watermains crossing the site.	There are no public sewers close to this site.	N/a
8. Land at Llandow Trading Estate, Llandow	Local Employment	160mm diameter watermain crossing the site.	There are no public sewers close to this site.	N/a
EMP1 Employment Regeneration Opportunity Areas				
1. Former Aberthaw Power Station	Redevelopment for B1, B2, B8 & Low/zero carbon employment and infrastructure	The allocation covers a substantial area of land and there are numerous existing assets crossing the area.	The allocation covers a substantial area of land and there are numerous existing assets crossing the area.	The site is between East Aberthaw & West Aberthaw WwTW catchments.
2. Land at the Port of Barry	Redevelopment for B1, B2, B8 & Low/zero carbon employment and infrastructure	The allocation covers a substantial area of land and there are numerous existing assets crossing the area.	The allocation covers a substantial area of land and there are numerous existing assets crossing the area.	The site is in Cog Moors WwTW catchment.