



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	Rob Mitchell	
Organisation (If applicable)	Lidl GB Ltd		Organisation (If applicable)	CarneySweeney	
Address	c/o Agent		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	☐
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Comments:

The Policy text should be changed as follows:

"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will be permitted where the proposal would:..."

The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:

"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:

- Details of the existing use or previous use if vacant;*
- The length of time the unit has been vacant, if applicable;*
- The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;*
- The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."*

However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (*R (Cherkley Campaign Ltd) v Mole Valley District Council*). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RCS1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.

We also have concerns with criterion 5 which states to *"Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre"*. This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

Please attach additional pages if required.

QUESTION 2: WELSH LANGUAGE

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

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

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.

Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including ... the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.

Additionally, paragraph 3.25 of PPW states that "The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal." Paragraph 3.29 goes on to suggest language impact assessments are required for "large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language" with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.

The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan's statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is "unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan", the Plan should seek to **promote** the Welsh language.

Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Please attach additional pages if required.

IMPORTANT INFORMATION

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

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

BY EMAIL – ldp@valeofglamorgan.gov.uk

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

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

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

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

How we will use your information

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

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

REPRESENTATION FORMS SHOULD BE RETURNED BY NO LATER THAN

23:55 ON WEDNESDAY 11th MARCH 2026

REPRESENTATIONS RECEIVED AFTER THIS TIME WILL NOT BE CONSIDERED

Signed:		Date:	11 March 2026
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