



LRM
PLANNING
LIMITED

LAND AT ABERTHIN ROAD, COWBRIDGE

PRE-APPLICATION CONSULTATION REPORT

Prepared by LRM Planning Limited
on behalf of Hafod Housing

December 2018



Report Control

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Primary author: Francesca Sanders

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Review by: Steffan Harries

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1 Introduction

- 1.1 This Pre-Application Consultation Report has been prepared on behalf of Hafod Housing to accompany a full planning application for the demolition of existing buildings and replacement with residential development on land at Aberthin Road, Cowbridge. The proposed development comprises the demolition of the former school buildings; and development of 48 units (including 43 flats and 5 houses) and associated works. A site location plan is included at appendix 1.
- 1.2 This report, and the consultation process, has been carried out in accordance with legislation provided by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. Specifically, the report complies with the requirement for major development (in this case, a development of 10 dwellings or more) to carry out a pre-application consultation exercise with the local community, stakeholders and specialist consultees.
- 1.3 This report outlines the legislative framework of the mandatory exercise; the methodology used; the outcome of the statutory exercise; the applicant's response to comments received; and a conclusion of the main findings.



2 Statutory Pre-Application Consultation requirements

- 2.1 This Pre-Application Consultation Report has been prepared in line with legislation provided by the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016. A summary of the key requirements of this is provided here.

Display of site notices

- 2.2 The applicant must display a site notice in at least one place on or near the land to which the proposed application relates for a period of no less than 28 days before submitting an application for the proposed development. It is at the discretion of the applicant if the consultation period is to last longer than 28 days.

Publication of draft planning application

- 2.3 The applicant must make the draft planning application information available publicly. This must include draft planning application forms; scaled site location plan; all other scaled plans (site layout, floor plans, elevations); Design and Access Statement; and any information that would be needed in order to comply with any local validation requirements of the Local Planning Authority.

Advertisement to interested local persons and specialist consultees

- 2.4 The applicant must write to any owner or occupier of any land adjoining the land to which the proposed application relates. It is at the discretion of the applicant as to whether this advertisement extends beyond the mandatory requirements. The applicant must also consult 'community consultees' (local/community and Ward Councillors); and 'specialist consultees'. Specialist consultees comprise the list of consultees in schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as amended by the 2016 Order. Within this list, the applicant must identify the relevant specialist consultees depending on the site and its context.

Summary of responses received

- 2.5 The applicant must review and summarise the responses received from all persons and bodies consulted during the statutory 28-day period.

Resulting actions from responses received

- 2.6 The applicant must provide comments as to how each response received from consultees has been addressed through the application.



3 Methodology

- 3.1 The requirements of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 were adhered to through the pre-application consultation process. The following paragraphs outline the methodology that LRM Planning has undertaken on behalf of the applicant in respect of the proposed residential development on land at Aberthin Road, Cowbridge. The consultation period ran between the 12th November 2018 and the 10th December 2018.

Display of site notices

- 3.2 Bilingual site notices were produced and displayed at prominent and visible locations, directly adjacent to the site along Aberthin Road and along Millfield Drive to the west of the site.
- 3.3 The site notices were erected on Monday 12th November 2018 and were retained in place until Monday 10th December 2018, a period of 28 days. Copies of the site notices are available at appendix 2, and a map and photographs showing the location of the displayed site notices is available at appendix 3. A declaration of the posting of the site notices is supplied at appendix 4.

Publication of draft planning application

- 3.4 On Monday 12th November 2018, LRM Planning, as the applicant's agent, displayed a draft planning application package on its website (www.lrmplanning.com), such that it was ensured that the application was available to view by interested parties for at least the entire 28-day consultation period. The information displayed on the LRM Planning website comprised the following:

- Draft Planning Application Forms
- Design and Access Statement
- Draft Transport Statement
- Noise Assessment
- Drainage Strategy
- Archaeological and Heritage Assessment
- Ecology Report
- Tree Constraints Plan
- Tree Report
- Drawings:
 - Site Location Plan
 - Proposed Site Plan
 - Existing Site Survey
 - House Elevations
 - Proposed House Plans
 - Apartment Elevations
 - Proposed Apartment Plans (Ground Floor and First Floor)
 - Proposed Bat Roost
 - Proposed Cycle Store
 - Privacy Distances



Advertisement to interested local persons and specialist consultees

- 3.5 The publicity to neighbours comprised a letter-drop to some 40 addresses, which included all adjoining landowners and a number of additional properties identified by the development team along Aberthin Road and Millfield Drive, as well as Cowbridge Fire Station and Cowbridge Ambulance Station.
- 3.6 A copy of the letter and notice issued to local owners and occupiers of the surrounding dwellings/land is provided at appendix 5. A map of the surrounding area, showing the extent of the letter drop, is displayed at appendix 6.
- 3.7 An email and attached notice were issued to the following persons in their roles as Ward Councillors for the locality:
- **Cllr Geoffrey A. Cox, Cllr T. Hunter Jarvie, and Cllr Andrew Parker**, as the Ward Councillors for Cowbridge, the Ward in which the site lies.
 - **Cowbridge (Ancient Borough) with Llanblethian Town Council**, as the local town council.
- 3.8 A copy of the notice issued to the Ward Councillors and Town Council is provided at appendix 7.
- 3.9 An email and Notice were also issued to the following bodies in their roles as identified specialist consultees in accordance with the requirements listed in the table under schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016:
- **Vale of Glamorgan Council Highways Authority** – as the development is likely to result in a material increase in the volume of traffic entering or leaving a classified road; the development involves the formation or alteration of a means of access to a highway; the development consists of the laying out of a new street; and as an adjoining landowner.
 - **Dŵr Cymru Welsh Water** – as the water and sewerage undertaker.
 - **Natural Resources Wales** – as the site lies within 2km of a Site of Special Scientific Interest (Cors Aberthin).
 - **Cadw** – as the site measures over 0.5ha in area and is within 2km of a Scheduled Ancient Monument (Stalling Down Round Barrow).
- 3.10 A copy of the email and Notice issued to specialist consultees is provided at appendix 8.



4 Statutory Pre-Application Consultation Results

- 4.1 A copy of all written responses from neighbouring landowners are available to view by appointment at LRM Planning.
- 4.2 During the consultation period, the responses received can be summarised as follows:
- There were 44 responses were received from either local residents or local groups.
 - 43 out of the 44 responses comprised concerns or objection to the proposals, with 1 response praising the proposals.
 - Two of these responses were signed off by persons identifying themselves as local action groups, but these comments are included amongst the 44 responses from neighbours, seeing as there is no additional status afforded to such groups under the PAC protocol.
 - No responses were received from Local Councillors.
 - Three responses were received from statutory bodies – Natural Resources Wales, Cadw and Dŵr Cymru Welsh Water.

Neighbour and Councillor comments

- 4.3 The responses from neighbours are categorised as follows. No response was received from any of the local Councillors.

Comment/issue	Number of respondents
Overdevelopment/density and height of the building	26
Demolition/loss of the existing school building	25
Car parking	21
Design	11
Overlooking/overshadowing of neighbouring properties	10
Increased traffic/congestion	8
Impact on local services	6
Amenity	6
Ecology and arboriculture	5
Noise/light/air pollution	5
Public transport provision	4
Overprovision of social housing	3
Concerns over the adequacy of the heritage assessment	1



Construction impact	1
Access for emergency services	1
Matters raised that are not material planning considerations	
The tenure/residents of the proposed scheme	7
Concerns that the perceived lack of public transport and employment would mean that any unemployed residents would not be motivated to seek employment.	1
Concerns that the proposed development segregates the most vulnerable individuals to live in the most unpleasant areas.	1
Loss of television signal.	1
Perceived increase of risk of burglary, theft and antisocial behaviour due to the tenure of the proposed scheme.	1
Concerns relating to bats fouling on existing properties.	1
Concerns relating to the ability of Hafod to manage the scheme.	1

Statutory bodies' responses

- 4.4 Dŵr Cymru Welsh Water (DCWW) offered no objection to the proposed development and sought to make the applicant aware of the requirement to consider the discharge of surface water through the drainage hierarchy. They also advised that foul only flows can be accommodated within the public sewerage system. They also offer no objection to the proposals to discharge surface water flows into an existing culvert to the north of the site.
- 4.5 The map associated with the response indicates that there is a 225mm foul main running through the north eastern section of the site. This main attracts an easement of 3m, however the proposed development has been designed so that no permanent structures are proposed within the protection zone. In addition, DCWW confirmed that a water supply can be made available to service the proposed development and that there are no problems envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from the site.
- 4.6 The response received from Natural Resources Wales (NRW) advises that they have concerns with the proposed development in its current form. These concerns relate primarily to the presence of bats within the development site. They outline that further survey work needs to be carried out prior to the submission of the planning application and that this work should be used to inform the mitigation strategy which should be proportionate and appropriate to the bat species and roost types on site. This additional survey work should specifically include further detail regarding the Lesser Horseshoe hibernation roost under the A48 flyover. They also reference the omission of the previous Ecology Report undertaken by David Clements Ecology as part of the submission.
- 4.7 NRW have also stated that where a bat house is being provided, the drawings should clearly



include the dimensions and volume of the space available to bats and details of the construction materials. In addition, with regards to the location of the bat house, proper consideration should be given to identifying flight lines used on site and ensuring these are retained within the development. Security measures to ensure that there is no human/predator access to the building will also be required.

- 4.8 NRW suggest that a lighting and landscaping plan would be required as part of the planning application to reduce light over the site as a whole and avoid lighting completely in proximity to the bat house and boundaries of the site, ensuring that a vegetated dark corridor would be maintained to the bat house which connects to the wider landscape.
- 4.9 Finally, NRW sought to make the applicant aware that where a bat house has been created as mitigation for the loss of a Lesser Horseshoe maternity roost, evidence would be required indicating that the bat house is being used in this capacity prior to any works being permitted to the existing roost. Furthermore, any trees to be removed as part of the proposed development will need to be inspected for bats prior to their removal.
- 4.10 The comments raised by NRW have either been addressed through the updated ecological reporting, or are being accounted for under continued ecological work.
- 4.11 The response received from Cadw advises they have no objection to the proposed development in terms of the likely impact on any designated or registered assets, however there have been a number of recent requests to list the former school building subject to this application. As such they have recently visited the site and are currently assessing the building against the relevant criteria, a final decision of the listing of the building is to be made in due course.
- 4.12 A copy of the responses from DCWW, NRW and Cadw are included at appendix 9.



5 The applicant's response

- 5.1 As required by the legislation governing the pre-application consultation, this section summarises the comments received, and provides the Applicant's response to each. As mentioned in section 4, the analysis is predicated upon grouping comments on a similar topic together.
- 5.2 In order to scrutinise the comments received from all parties, each section includes in brackets the number of instances of the comments being received.

Overdevelopment/density and height of the building

- 5.3 **Nature of comment (26/44 local resident/local group comments):** A number of respondents raised concerns regarding the height of the apartments and in particular in relation to the proposed four storey element of the building stating that was considered to be overbearing. Respondents also felt that the scheme constituted overdevelopment/density of the site. In addition, concerns were raised over the increase in the density of the site over above the LDP allocation of 20 units.
- 5.4 **Applicants' response:** The site is brownfield land located in a highly sustainable location within a large town within the Vale of Glamorgan. This, coupled with national guidance contained within Planning Policy Wales, advocates a higher density development within acceptable parameters. The location of the new buildings broadly reflect the existing school building footprint. In addition, the scale and massing of the development is considered appropriate given the staggered ridge height across the site which steps down from four storey apartments adjacent to the A48 flyover to the north of the site, to two-and-a-half storey housing to the south of the site, adjacent to the existing properties along Slade Close. Provided that no unacceptable planning concerns are arising from the proposed scale, this density of development should be encouraged, given the context.

Demolition/loss of the existing school building

- 5.5 **Nature of comment (25/44 local resident/local group comments):** A number of respondents have either objected to or raised concerns over the demolition of a historic/Victorian building which offers original features and is deemed to have cultural value, instead wishing to see retained and converted to residential use, or elements of it retained/reused. There were also a number of queries relating to the cost difference between refurbishment of the existing building and its total demolition and replacement with a new-build structure.
- 5.6 **Applicant's response:** The existing building holds no legislative preservation or conservation status. There is no prospect to refurbish and retain the existing building and deliver a worthwhile number of units on what is a sought-after site in an excellent location.

Car parking

- 5.7 **Nature of comment (21/44 local resident/local group comments):** Various concerns regarding the amount of car parking, including visitor parking proposed to be provided on-site and the possibility of the adjacent school using the area for teacher/parent parking. Concerns were also



raised regarding the accessibility of the ambulance and fire station in relation to parking and the legitimacy of the evidence provided in the Transport Statement. One respondent also raised concerns regarding the location of a number of parking spaces within the Root Protection Zones of existing trees.

- 5.8 **Applicants' response:** The supporting Transport Statement addresses this matter in detail, however in summary: the proposals constitute an increase in car parking provision in comparison to the existing site, which in educational use could have resulted in far greater levels of vehicular movement and remains the lawful extant use of the site; the level of car parking has been reduced due to the sustainable credentials of the site; and via a study of the social demographic of the future occupants and existing occupants of Hafod Housing developments. The level of car parking is also advocated by the newly published Planning Policy Wales, which steers Local Authorities away from minimum car parking standards, particularly in sustainable locations.
- 5.9 Existing car parking concerns experienced by neighbouring residents are outside of the control of the applicant and it is sought to ensure that adequate parking provision is enabled on site to ensure that any existing problems are not exacerbated.
- 5.10 With regards to the legitimacy of the Transport Statement, this report has been undertaken by suitably qualified professionals using TRICS data, which is a recognised industry standard database/methodology. In addition, the submitted Transport Statement will be further assessed by the Vale of Glamorgan Highways Department upon submission of this application, at which time any outstanding issues will be addressed by the applicant.
- 5.11 Car parking spaces within the location of the root protection zones of existing trees will be constructed using a hand dig methodology to ensure that there is no detrimental impact to relevant specimens.

Design

- 5.12 **Nature of comment (11/44 local residents/local group comments):** A number of respondents raised concerns relating to the scale and attractiveness of the proposed design, the proposed materials and how the buildings reflect the character of Cowbridge as well as the amenities provided as part of the development. Concerns were also raised in relation to the proximity of the proposed dwellings to Aberthin Road. In addition, one respondent raised concerns in relation to the size of the proposed lift stating that it could not accommodate the required number of emergency personnel as well as a patient at any given time. Another respondent wished to see small two storey, two-bedroom dwellings for young families and elderly people.
- 5.13 One respondent stated that they believed the drawings accompanying the application were deliberately misleading in relation to the proposals and in particular the height of the A48 flyover and objected to the lack of scale bars shown on the drawings presented at the consultation event. A number of other respondents also raised the lack of an identified scale on the consultation material as an issue.
- 5.14 **Applicant's response:** The proposed design has been developed over time in response to comments received from parties consulted, including the Local Planning Authority. It aims to draw on the features/materials of the existing building, such as strong gables, parapets, stone



banding and slender window proportions but use them in a more contemporary way, and in a way that suits the nature of a residential development. Feature banding around windows groups of windows creates depth and adds relief to the elevations, as well as a contrasting ground floor storey and horizontal banding used to visually reduce the scale. The material palette of bricks references the existing masonry of the school, but provides a contemporary interpretation.

- 5.15 The proposed lift meets with the relevant Welsh Government Design Quality Requirements and Lifetime Homes standard in terms of its size and can accommodate 8 people. In addition, the proposed mix of dwellings has been derived in accordance with local need.
- 5.16 With regard to the drawings available at the consultation event, we can confirm that whilst the consultation boards themselves were not shown to scale, there were drawings available at the event which were included an identified scale and were available for public viewing. In addition, the relevant drawings published on the consultation website all included an identified scale bar.

Overlooking/overshadowing of neighbouring properties

- 5.17 **Nature of comment (10/44 local resident/local group comments):** A number of respondents raised concerns that overlooking/overshadowing of existing neighbouring properties or gardens and/or claimed a loss of privacy will result from the proposed development, in particular from the full height windows. In addition, respondents had concerns relating to the topography of the site in relation to existing properties and the affect that this will have on amenity for existing residents.
- 5.18 **Applicants' response:** Generally accepted guidance requires a 10.5m separation distance from habitable room windows of proposed dwellings to site boundaries, and 21m separation from directly facing proposed and existing habitable room windows. These standards are achieved on site and in addition, boundary treatments will ensure that no direct overlooking occurs to an unacceptable extent to the west and south of the site in particular. Furthermore, the proposed development situated to the south of the site, nearer to the existing residential development, is limited to two-and-a-half storeys in height.

Increased Traffic/Congestion

- 5.19 **Nature of comment (8/44 local resident/local group comments):** Concern over potential increase in traffic arising from proposed development and congestion in Cowbridge generally.
- 5.20 **Applicants' response:** The supporting Transport Statement addresses this matter in detail, however it should be noted that the trip generation potential of the proposed development was considered with the use of the industry standard TRICS database. For a robust assessment, the extant trip attraction potential of the sixth form block was not considered. The overall assessment of the site concluded that the vehicle trips associated with the proposed development are not considered material nor discernible in the case of highway safety or the capacity of the surrounding highway network.

Impact on local services

- 5.21 **Nature of comment (6/44 local resident/local group comments):** Concerns about the impact of future population of the development on local schools/medical facilities.



- 5.22 **Applicants' response:** The Local Authority will have an opportunity to request financial payments from the developer if they feel necessary, in order to ensure that any impact on existing facilities from the proposed development is absorbed.

Amenity

- 5.23 **Nature of comment (6/44 local resident/local group comments):** Concerns were raised that the proposed development provides insufficient amenity space for future occupants and that the proposed apartments would overlook the A48 flyover. Concerns were also raised over the proximity of the proposed development to the A48 and the current Cowbridge Comprehensive School.
- 5.24 **Applicants' response:** The type and location of the development site is such that it is not uncommon to have minimal amenity space for flatted developments. There are numerous open spaces within walking distance of the site. In addition, the development will provide financial contributions to upgrade local amenity space, if required. Furthermore, there are no windows above the level of the A48 flyover, and it is not uncommon to have residential development in close proximity to a local school – in this regard there is no direct view from any habitable room windows in the direction of the existing school. The Noise Survey accompanying the application was also undertaken during term time, and therefore would have considered the impact of any noise emanating from the school.

Ecology and arboriculture

- 5.25 **Nature of comment (5/44 local resident/local group comments):** A number of respondents raised concerns regarding the loss of existing trees on the development site. In addition, four respondents referenced concerns over the loss of a Yew tree which they purport to be part of the town's heritage. Another neighbour of the site raised concerns regarding the proposed bat roost in close proximity to their property.
- 5.26 **Applicant's response:** A detailed tree survey and proposed landscaping scheme accompanies this application. It is considered that the loss of the proposed tree specimens is fully justified in the context of the application, and is mitigated for as part of the proposed landscaping scheme.
- 5.27 With regards to the proposed bat roost, this is situated within the existing flight line utilised by bats, in addition as the bats are already using the existing school building. The impact of a single storey structure to be used solely as bat habitat will not have any adverse impact upon neighbouring properties.

Noise/light/air pollution

- 5.28 **Nature of comment (5/44 local residents/local group comments):** A small number of respondents raised concerns regarding the noise/light/air pollution which could emanate from the proposed development and to the methodology of the noise survey. Concerns were also raised over the proposed noise impact of the A48 on the proposed four storey element of the building.
- 5.29 **Applicant's response:** The Noise Survey which accompanies this application was undertaken in accordance with the relevant guidance as set out in Planning Policy Wales, TAN 11 and BS



8233:2014. The conclusions of this report confirm that subject to the proposed mitigation, which includes a comprehensive glazing and ventilation scheme noise can be attenuated to an acceptable level in all internal areas and does not pose a constraint to the development of the site for residential purposes.

- 5.30 A detailed lighting scheme will be produced in due course which adhere to the relevant recommendations in respect of bats, and considers the effect of lighting of the proposed development on surrounding properties.
- 5.31 No concerns were raised by the local authority in respect of air pollution as part of the pre-application process. Should air quality be a legitimate issue then it will be raised by the Local Authority's Environmental Health/Pollution Control Officer who is a consultee as part of the planning process.

Public transport provision

- 5.32 **Nature of comment (4/44 local residents/local group comments):** A number of respondents raised concerns regarding the perceived poor provision of public transport within Cowbridge, and in particular how this affects the ability of any new residents to commute to work.
- 5.33 **Applicant's response:** The supporting Transport Statement submitted with this application confirms that there are a wide range of non-car travel options available within Cowbridge which offer viable alternatives to trips by car. These options include good pedestrian and cycle access to a wide range of facilities and services (including local employment opportunities) within Cowbridge town centre. In addition to the bus stop located directly adjacent to the site boundary, two further stops are located within 400m to the south of the site along Cardiff Road providing services to Cardiff, Porthcawl and other local destinations at a frequency of between one and four buses per hour on weekdays.
- 5.34 In addition, further development within Cowbridge will facilitate a critical mass of population to help sustain and provide new facilities and services as well as employment opportunities within the town.

Overprovision of social housing

- 5.35 **Nature of comment (3/44 local resident/local group comments):** Concerns that in conjunction with the development at Darren Farm, that there will be an overprovision of social housing in the local area of Cowbridge.
- 5.36 **Applicants' response:** The Vale of Glamorgan LDP outlines that there is a requirement for 3,252 affordable dwellings over the plan period of 2011-2026. Darren Farm will provide just 190 of the total number of affordable dwellings required. Cowbridge is identified as a second tier Service Centre Settlement which will act as a focal point for growth in the Vale within the LDP. The proposed development will therefore help meet the identified need for affordable housing in an appropriate and sustainable location within the Vale of Glamorgan.

Concerns over the adequacy of the Heritage Assessment

- 5.37 **Nature of comment (1/44 local resident/local group comments):** Concerns over the accuracy of



the statements outlined in the Heritage Assessment accompanying the application.

- 5.38 **Applicants' response:** The Heritage Assessment accompanying this application was undertaken by a suitably qualified professional, in accordance with the Standard and Guidance for Historic Environment Desk-Based Assessment issued by the Chartered Institute for Archaeologists (CIfA, 2014) and Heritage Impact Assessment in Wales (Cadw, 2017). These guidelines provide a national standard for the completion of desk-based assessments and heritage impact assessments. The Assessment is therefore considered suitable for purpose. In addition, the final report will be further assessed by the Vale of Glamorgan Council upon submission of this application, at which time any further comments will be addressed by the applicant.

Construction impact

- 5.39 **Nature of comment (1/44 local resident/local group comments):** Comments regarding construction impacts including construction parking/access arrangements.
- 5.40 **Applicants' response:** Construction traffic, dust, noise, and any other construction impact considerations can be dealt with via an appropriately worded condition to be imposed by the Local Authority, if deemed appropriate, requiring the submission of a Construction Management Plan.

Access for emergency services

- 5.41 **Nature of comment (1/44 local resident/local group comments):** Concerns raised over the single access point proposed in relation to emergency vehicles.
- 5.42 **Applicant's response:** The Transport Statement accompanying this application ensures that all requisite vehicles are able to access the site. Obstructions off-site are not within the control of the applicant.

Matters raised not classified as materials planning considerations

- 5.43 The following comments raised are not responded to as they are not material planning considerations, or are matters entirely outside of the control of the development team.
- The proposed tenure of the housing is raised as a concern by residents, including queries as to whether this development will house residents who are drug users; those who have been in prison; and/or sex offenders; and how this will affect local school children.
 - Concerns that the perceived lack of public transport and employment would mean that any unemployed residents would not be motivated to seek employment.
 - Concerns that the proposed development segregates the most vulnerable individuals to live in the most unpleasant areas.
 - Loss of television signal.
 - Perceived increase of risk of burglary, theft and antisocial behaviour due to the tenure of the proposed scheme.



- Concerns relating to bats fouling on existing properties.
- Concerns relating to the ability of Hafod to manage the scheme.

5.44 Notwithstanding the fact that the above points are not material planning considerations, the applicant would like to clarify that the tenure of the proposed development as social housing, does not mean that drug users and sex offenders will be housed in this location.



6 Conclusions

- 6.1 This Pre-Application Consultation Report is submitted as part of a full planning application for the demolition of existing buildings and replacement with a proposed residential development on land at Aberthin Road, Cowbridge. The proposed development comprises the demolition of the former school buildings; and development of 48 units (including 43 flats and 5 houses) and associated works. This Report is a statutory requirement and addresses all matters required by article 1 of the Town and Country Planning (Development Management Procedure)(Wales)(Amendment) Order 2016.
- 6.2 It has been demonstrated herein that the applicant has undertaken all measures necessary to comply with the guidance.
- 6.3 Alongside the planning application, this report demonstrates that the issues raised by the local community and statutory consultees have either been addressed as part of the application; justified in planning terms; or are not material planning considerations that require addressing.
- 6.4 The finalised proposals that form part of the planning application are therefore the result of an iterative process that has sought to engage the local community. It is also asserted that the development is entirely appropriate given its context, and for these reasons, as well as the considerations put forward in other supporting documents it is considered that Vale of Glamorgan Council should recommend the approval of this planning application.

LRM Planning
December 2018



Appendix 1 – Site Location Plan



— Site Boundary

**Site Area = 5170m²
0.517ha**

pentan
architects

22 Cathedral Road
Cardiff CF11 9LJ

t: 029 2030 9010
info@pentan.co.uk

Project
Aberthin Road, Cowbridge

Client
Hafod Housing

Drawing Title

Site Location Plan

Date
Nov '18

Scale
1 : 1250 @ A4

Drawing No.
3703 / PA / 001

Rev.



Appendix 2 – Site Notice

PUBLICITY AND CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION NOTICE

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

Purpose of this notice: This notice provides the opportunity to comment directly to the developer on a proposed development prior to the submission of a planning application to the Local Planning Authority ("LPA"). Any subsequent planning application will be publicised by the relevant LPA; any comments provided in response to this notice will not prejudice your ability to make representations to the LPA on any related planning application. You should note that any comments submitted may be placed on the public file.

Proposed development at: Site at Aberthin Road, Cowbridge, CF71 7EN

I give notice that: Hafod Housing

Is intending to apply for planning permission for: Full planning consent for the demolition of existing buildings; development of 48 dwellings; and associated works.

You may inspect copies of:

- The proposed application;
- The plans; and
- Other supporting documents.

Online at: <http://lrmplanning.com/public-consultation/>

Computer facilities are available to view this information online at: Cowbridge Library, Old Hall, High Street, Cowbridge, CF71 7AH which is open: Monday, Tuesday, Thursday and Friday (10.00-17.00); Wednesday (10:00-19:00); Saturday (10:00-16.00); and closed Sunday.

Anyone who wishes to make representations about this proposed development must write to the applicant/agent at:

Email: admin@lrmplanning.com

Address: LRM Planning, 22 Cathedral Road, Cardiff, CF11 9LJ

All responses must be received by: Monday 10th December 2018

CYHOEDDUSRWYDD AC YMGYNGHORI CYN GWNEUD CAIS AM GANIATÂD CYNLLUNIO

Gorchymyn Cynllunio Gwlad a Thref (Gweithdrefn Rheoli Datblygu) (Cymru) 2012

Diben yr hysbysiad hwn: Mae'r hysbysiad hwn yn rhoi cyfle i wneud sylwadau yn uniongyrchol i'r datblygwr ynglŷn â datblygiad arfaethedig cyn cyflwyno cais am ganiatâd cynllunio i'r Awdurdod Cynllunio Lleol ("ACLI"). Bydd unrhyw gais cynllunio dilynol yn cael ei hysbysebu gan yr ACLI perthnasol; ni fydd unrhyw sylwadau a ddarperir gennych wrth ymateb i'r hysbysiad hwn yn lleihau dim ar eich gallu i gyflwyno sylwadau i'r ACLI ar unrhyw gais cynllunio cysylltiedig. Dylech nodi y gellir gosod unrhyw sylwadau a gyflwynir gennych yn y ffeil gyhoeddus.

Datblygiad Arfaethedig yn: Safle yn Heol Aberthin, Y Bont-Faen, CF71 7EN

Rwyf yn hysbysu bod: Tai Hafod

Yn bwriadu gwneud cais am ganiatâd cynllunio er mwyn: Caniatâd cynllunio llawn i dymchwelu'r adeiladau presennol; adeiladu 48 cartrefi; a gwaith cysylltiedig.

Gellwch archwilio copïau o'r canlynol:

- y cais arfaethedig;
- y planiau; a
- dogfennau ategol eraill

Ar-lein yn: <http://lrmplanning.com/public-consultation/>

Mae cyfleusterau cyfrifiadur ar gael i archwilio'r wybodaeth hon ar lein yn: Llyfrgell y Bont-Faen, Stryd Fawr, Y Bont Faen, CF71 7AH, sydd ar agor: Dydd Llun, Dydd Mawrth, Dydd Iau a Dydd Gwener (10.00-17.00); Dydd Mercher (10:00-19:00); Dydd Sadwrn (09.30-16.00); ac ar gau ar Dydd Sul.

Mae'n rhaid i unrhyw un sy'n dymuno gwneud sylwadau ynglun â'r datblygiad arfaethedig hwn ysgrifennu at y ceisydd/yr asiant yn:

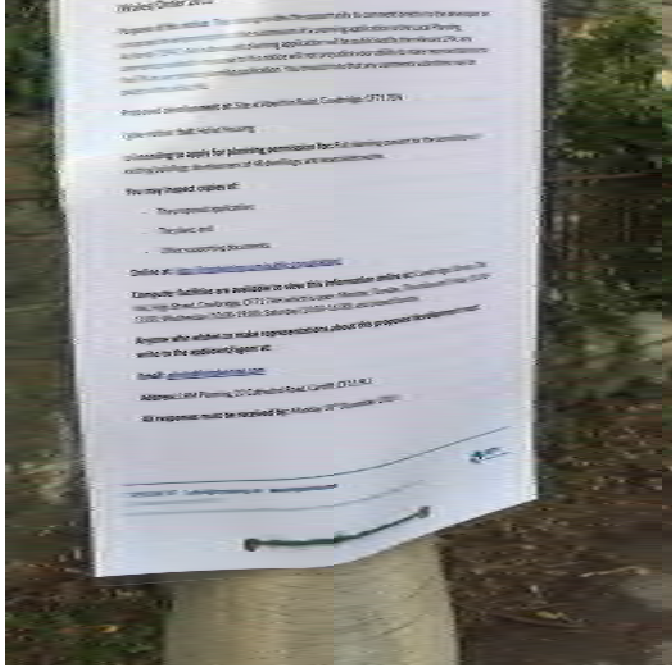
Cyfeiriad e-bost: admin@lrmplanning.com

Cyfeiriad: LRM Planning, 22 Heol y Gadeirlan, Caerdydd, CF11 9LJ

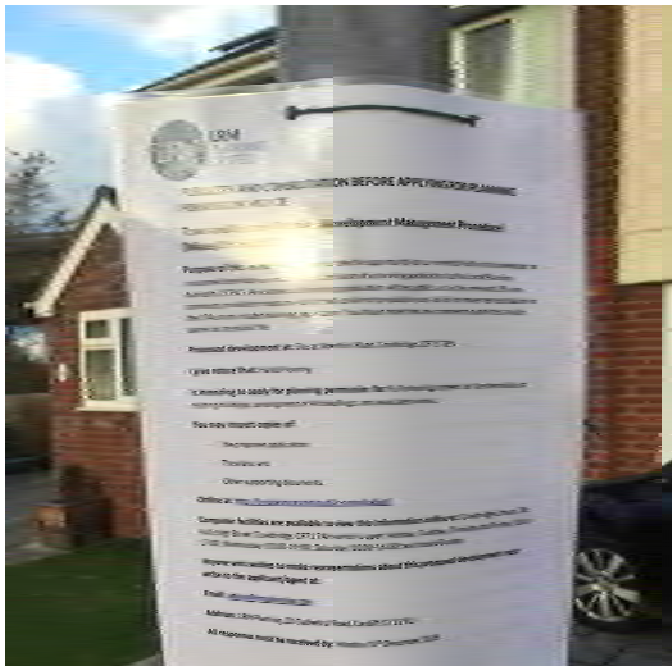
Rhaid anfon ymateb i ddod i law erbyn: Dydd Llun 10^{fed} Rhagfyr 2018



Appendix 3 – Photographs and aerial map of locations for display of Site Notices



Photographs showing locations for display of site notices





Aerial map showing locations for display of site notices



Appendix 4 – Declaration of display of Site Notice

DECLARATION OF DISPLAY OF SITE NOTICE

Town and Country Planning (Development Management Procedure) (Wales) Order 2012

I give notice that:	LRM Planning Ltd.
On behalf of:	Hafod Housing
Has correctly displayed bilingual site notices on site at:	Aberthin Road, Cowbridge.
Advising interested parties of the intention to develop the site in respect of:	Full Planning Application for 48 dwellings (43 flats and five houses) and associated works.
On:	Monday 12 th November 2018
For a period of:	No less than 28 days
Declaration made by:	Steffan Harries, Associate, LRM Planning

For more details, including number of site notices and location of displayed site notices, please see accompanying Pre-Application Consultation Report.



Appendix 5 – Copy of letter issued to local owners and occupiers



Date: 12th November 2018
Our Ref: SH/18.181

Owner or Occupier

Dear Sir or Madam,

**Publicity and Consultation Before Applying for Planning Permission Notice Under Articles 2C and 2D Town and Country Planning (Development Management Procedure) (Wales) Order 2012
Proposed development of 48 dwellings (43 flats and five houses) and associated works at Aberthin Road, Cowbridge**

LRM Planning is acting as planning agent to Hafod Housing in respect of a proposed development outlined above at Aberthin Road, Cowbridge. We are writing to you as a near neighbour of the site to provide the enclosed notice, which gives you the opportunity to comment directly to the applicant, prior to the formal planning application being made to the Local Authority.

The draft planning application, including full set of drawings, can be viewed by visiting <http://lrmplanning.com/public-consultation/> and then following the link for Aberthin Road, Cowbridge. Alternatively, visit the LRM website (www.lrmplanning.com) and click on 'Public Consultations', via the menu in the top left-hand corner of the screen. Should you wish to comment, please contact us via the email or postal address provided below, or the feedback form on the website.

In addition to the opportunity to comment on the plans online, the applicant is hosting a public consultation event between the hours of **4.00pm and 7.00pm on Tuesday 4th December at Cowbridge High School, Aberthin Road**. The format of the event is an informal arrangement where we will display the proposed plans and invite interested parties to discuss the proposals with members of the development team in an open manner in order to express opinions and hopefully, to alleviate concerns. We will take away any comments received and consider these prior to the submission of a formal planning application.

Following a period of 28 days, the comments received will be reviewed, considered and responded to, in the form of a Pre-Application Consultation Report that will accompany the planning application. The planning application will be submitted to Vale of Glamorgan County Council for consideration soon thereafter. The deadline for comments on this application is Monday 10th December 2018. **You will have an opportunity to comment directly to the Local Authority once the application is submitted.**

Yours faithfully,

Steffan Harries
Associate
LRM Planning Ltd

*Os hoffwch fersiwn Cymraeg o'r lythr hon, cysylltwch ag
LRM Planning, os gwelwch yn dda*

*Should you require a Welsh language version of this letter,
please contact LRM Planning*



Appendix 6 – Map of surrounding streets showing extent of letter drop

Extent of letter drop





Appendix 7 – Copy of correspondence issued to Councillors

Steffan Harries

From: Steffan Harries
Sent: 12 November 2018 15:41
To: 'AParker@valeofglamorgan.gov.uk'; 'hjarvie@valeofglamorgan.gov.uk'; 'gacox@valeofglamorgan.gov.uk'; 'enquiries@cowbridge-tc.gov.uk'
Cc: Kate Cutter (Kate.Cutter@hafod.org.uk)
Subject: Statutory Pre-Application Consultation - Proposed residential development at Aberthin Road, Cowbridge
Attachments: 181112 Pre-Application Consultation Notice.pdf

Dear Councillors,

I am contacting you as part of the mandatory Pre-Application Consultation (PAC) exercise on planning applications for major development, to serve the attached notice. This notice comprises a formal invitation to provide Pre-Application Consultation comments.

This relates to a planning application for the demolition of the existing, now vacant, school and ancillary buildings at the former Cowbridge Grammar School Sixth Form site on Aberthin Road, and its replacement with a development of 48 dwellings (43 apartments and 5 houses), and associated works.

For transparency and reference, this email is addressed to the following persons:

- **Councillors Geoffrey A. Cox, T. Hunter Jarvie and Andrew Parker**, as Ward Councillors for Cowbridge Ward, which the site lies within.
- **Cowbridge (Ancient Borough) with Llanblethian Town Council**, as the local town council.

The formal notice attached provides information about the proposals, and gives details on how to view the draft planning application, which is now available for viewing on our website at www.lrmplanning.com, and includes drawings, draft planning application forms and draft Design & Access Statement. Also included are draft versions of a Transport Statement, Drainage Strategy, Noise Report, Tree Survey & Constraints Plan, Ecology Report and Heritage Impact Assessment.

To access this information, please follow the menu on the blue bar on the left-hand side of the webpage, click on 'Public Consultation', and then on the Aberthin Road, Cowbridge page. The formal consultation begins today, Monday 12th November and runs for 28 days until Monday 10th December. In accordance with the requirements of article 2E of the Order, any response you wish to make must be received by this date.

In addition to the opportunity to comment on the plans online, the applicant is hosting a public consultation event between the hours of **4.00pm and 7.00pm on Tuesday 4th December at Cowbridge High School, Aberthin Road**. The format of the event is an informal arrangement where we will display the proposed plans and invite interested parties to discuss the proposals with members of the development team in an open manner in order to express opinions and hopefully, to alleviate concerns. We will take away any comments received and consider these prior to the submission of a formal planning application.

Our advertisement of this development to neighbours is via display of site notice(s) and letter drop, being carried out today. The letter drop extends to the properties immediately adjoining and facing the development site and a number of properties in the surrounding area. You are of course more than welcome to inform residents beyond the immediate confines of the site, as you deem appropriate, who may also submit comments via the same means, and/or attend the consultation event.

In addition, should you find it useful to meet with members of the development team to discuss the proposals, please either email back or call on either of the below numbers, and we will seek to find a mutually convenient date.

If you have any queries, please do not hesitate to contact me on the details provided below.

Kind regards,

Steffan Harries Associate
BSc (Hons) MA(UD) MRTPI

t: 02920 349737 m: 07500 931546
website: lrmplanning.com
twitter: [@lrmp_lanning](https://twitter.com/lrmp_lanning)

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ
Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



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Appendix 8 – Copy of correspondence issued to specialist consultees

Steffan Harries

From: Steffan Harries
Sent: 12 November 2018 15:41
To: 'highwaydevelopment@valeofglamorgan.gov.uk'; cadw@wales.gsi.gov.uk;
'water.enquiries@dwrcymru.com'; southeastplanning@cyfoethnaturiolcymru.gov.uk
Cc: Kate Cutter (Kate.Cutter@hafod.org.uk)
Subject: Statutory Pre-Application Consultation - Proposed residential development at Aberthin Road, Cowbridge
Attachments: 181112 Pre-Application Consultation Notice.pdf

Dear Sir/Madam,

I am writing to you as a specialist consultee or adjoining landowner as defined by article 2(1) of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012, to serve the attached notice. This notice comprises a formal request for Pre-Application Consultation comments under article 2D of the Order.

This relates to a planning application for the demolition of the existing, now vacant, school and ancillary buildings at the former Cowbridge Grammar School Sixth Form site on Aberthin Road, and its replacement with a development of 48 dwellings (43 apartments and 5 houses), and associated works.

For transparency, this email is addressed to the following bodies/persons in accordance with the requirements listed in the table under schedule 4 of the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016:

- **Vale of Glamorgan Council Highways Authority** – as the development is likely to result in a material increase in the volume of traffic entering or leaving a classified road; the development involves the formation or alteration of a means of access to a highway; the development consists of the laying out of a new street; and as an adjoining landowner.
- **Cadw** – as the site measures over 0.5ha in area and is within 2km of a Scheduled Ancient Monument, in this instance in the form of Stalling Down Round Barrow.
- **Natural Resources Wales** – as the site lies within 2km of a Site of Special Scientific Interest, in the form of Cors Aberthin.
- **Dŵr Cymru Welsh Water** – as the water and sewerage undertaker concerned and the development involves new residential development.

The formal notice attached provides information about the proposals, and gives details on how to view the draft planning application, which is now available for viewing on our website at www.lrmplanning.com, and includes drawings, draft planning application forms and draft Design & Access Statement. Also included are draft versions of a Transport Statement, Drainage Strategy, Noise Report, Tree Survey & Constraints Plan, Ecology Report and Heritage Impact Assessment.

To access this information, please follow the menu on the blue bar on the left-hand side of the webpage, click on 'Public Consultation', and then on the Aberthin Road, Cowbridge page.

The formal consultation begins on Monday 12th November and runs for 28 days until Monday 10th December. In accordance with the requirements of article 2E of the Order, any response you wish to make must be received by this date.

If you have any queries, please do not hesitate to contact me on the details provided below.

Kind regards,

Steffan Harries Associate
BSc (Hons) MA(UD) MRTPI

t: 02920 349737 m: 07500 931546

website: lrmpanning.com

twitter: [@lrmpanning](https://twitter.com/lrmpanning)

Correspondence Address: 22 Cathedral Road, Cardiff CF11 9LJ

Registered Address: Nyewood Court, Brookers Road, Billingshurst RH14 9RZ



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Appendix 9 – Responses from Dŵr Cymru Welsh Water and Natural Resources Wales



Dŵr Cymru
Welsh Water

Developer Services
PO Box 3146
Cardiff
CF30 0EH

Tel: +44 (0)800 917 2652
Fax: +44 (0)2920 740472
E.mail: developer.services@dwrcymru.com

Gwasanaethau Datblygu
Blwch Post 3146
Caerdydd
CF30 0EH

Ffôn: +44 (0)800 917 2652
Ffacs: +44 (0)2920 740472
E.bost: developer.services@dwrcymru.com

LRM Planning Limited
22 Cathedral Road
Cardiff
CF11 9LJ

Date: 30/11/2018
Our Ref: PPA0003618

Dear Sir/Madam

Grid Ref: 300035 174606

Site Address: Former 6th Form Building, Aberthin Road, Cowbridge

Development: Schedule 1C Article 2D - Demolition of existing buildings and development of 48 dwellings

We refer to the letter received and your formal request for a pre-application consultation response from Dwr Cymru Welsh Water (DCWW), as a 'Specialist Consultee' as defined by Paragraph (y) of Schedule 4 of the Town & Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016, before applying for planning permission. It is acknowledged that the consultation request relates to a major development site and thus seeks a substantive response within 28 days from the date of the notice, 12th November 2018, as per the requirements of Article 2E. This request includes our views on the capacity of our network of assets and infrastructure to accommodate your proposed development.

Having reviewed the draft application pack we would advise there is no objection to the proposed development in principle albeit we offer the following standing advice which should be taken into account within any future planning application for the development:

SEWERAGE

Firstly we acknowledge that the application site is allocated for 20 dwellings (Ref: MG2 (18)) in the Vale of Glamorgan Local Development Plan (LDP) and, whereas this proposal comprises 45 dwellings, we would advise that foul flows from the proposed development can be accommodated within the public sewerage system. As part of this statutory pre-application consultation, we acknowledge receipt of an accompanying 'Drainage Strategy' (Drawing No. C-SK01) which indicates proposals to discharge surface water flows into an existing culvert and offer no objection in principle. Nonetheless, please note that no highway or land drainage run-off will be permitted to discharge directly or indirectly into the public sewerage system.



Welsh Water is owned by Glas Cymru – a 'not-for-profit' company.
Mae Dŵr Cymru yn eiddo i Glas Cymru – cwmni 'nid-er-elw'.

We welcome correspondence in
Welsh and English

Dŵr Cymru Cyf, a limited company registered in
Wales no 2366777. Registered office: Pentwyn Road,
Nelson, Treharris, Mid Glamorgan CF46 6LY

Rydym yn croesawu gohebiaeth yn y
Gymraeg neu yn Saesneg

Dŵr Cymru Cyf, cwmni cyfyngedig wedi'i gofrestru yng
Nghymru rhif 2366777. Swyddfa gofrestredig: Heol Pentwyn
Nelson, Treharris, Morgannwg Ganol CF46 6LY.

We would advise that the proposed development site is crossed by a combined public sewer with the approximate position being marked on the attached Statutory Public Sewer Record. In accordance with the Water Industry Act 1991, Dwr Cymru Welsh Water requires access to its apparatus at all times in order to carry out maintenance and repairs. However, with respect to the 'Drainage Strategy' (Drawing No. C-SK01), it appears the proposed development would be situated outside the protection zone of the public sewer measured 3 metres either side of the centreline. Accordingly, we recommend that this layout is proceeded as part of any forthcoming planning application submission.

You may need to apply to Dwr Cymru Welsh Water for any connection to the public sewer under Section 106 of the Water industry Act 1991. However, if the connection to the public sewer network is either via a lateral drain (i.e. a drain which extends beyond the connecting property boundary) or via a new sewer (i.e. serves more than one property), it is now a mandatory requirement to first enter into a Section 104 Adoption Agreement (Water Industry Act 1991). The design of the sewers and lateral drains must also conform to the Welsh Ministers Standards for Foul Sewers and Lateral Drains, and conform with the publication "Sewers for Adoption"- 7th Edition. Further information can be obtained via the Developer Services pages of www.dwrcymru.com.

You are also advised that some public sewers and lateral drains may not be recorded on our maps of public sewers because they were originally privately owned and were transferred into public ownership by nature of the Water Industry (Schemes for Adoption of Private Sewers) Regulations 2011. The presence of such assets may affect the proposal. In order to assist you may contact Dwr Cymru Welsh Water on 0800 085 3968 to establish the location and status of the apparatus in and around your site. Please be mindful that under the Water Industry Act 1991 Dwr Cymru Welsh Water has rights of access to its apparatus at all times.

SEWAGE TREATMENT

No problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

WATER SUPPLY

A water supply can be made available to service this proposed development. Initial indications are that a connection can be made from the '8" CI' diameter watermain in '300057, 174593' location. The cost of providing new on-site watermains can be calculated upon the receipt of detailed site layout plans which should be sent to the above address.

I trust the above information is helpful and will assist you in forming water and drainage strategies that should accompany any future planning application. I also attach copies of our water and sewer extract plans for the area, and a copy of our Planning Guidance Note which provides further information on our approach to the planning process, making connections to our systems and ensuring any existing public assets or infrastructure located within new development sites are protected.



Please note that our response is based on the information provided in your enquiry and should the information change we reserve the right to make a new representation. Should you have any queries or wish to discuss any aspect of our response please do not hesitate to contact our dedicated team of planning officers, either on 0800 917 2652 or via email at developer.services@dwrwymru.com

Please quote our reference number in all communications and correspondence.

Yours faithfully,



Owain George
Planning Liaison Manager
Developer Services

Please Note that demands upon the water and sewerage systems change continually; consequently the information given above should be regarded as reliable for a maximum period of 12 months from the date of this letter.



Dŵr Cymru
Welsh Water

PPA0003618



LEGEND(Representative of most common features)

- Waste networks:**
- Foul chamber
 - Surface water chamber
 - Combined chamber
 - Combined sewer overflow
 - Special purpose chamber
 - Treatment works
 - △ Pumping station
 - NB: Sewer symbol colour indicates the type:
RED - Combined
GREEN - Surface Water
BROWN - Foul
Purple - Former S24 sewers (for indicative purposes only)
 - Outfall
 - Lamphole
 - Storm Overflow
 - Rising main
 - Gravity sewer
 - Private sewer
 - Private sewer subject to Sect. 104 adoption agreement
 - Private Sewer Transfer
 - Lateral Drain
 - Inspection Chamber

Notes:

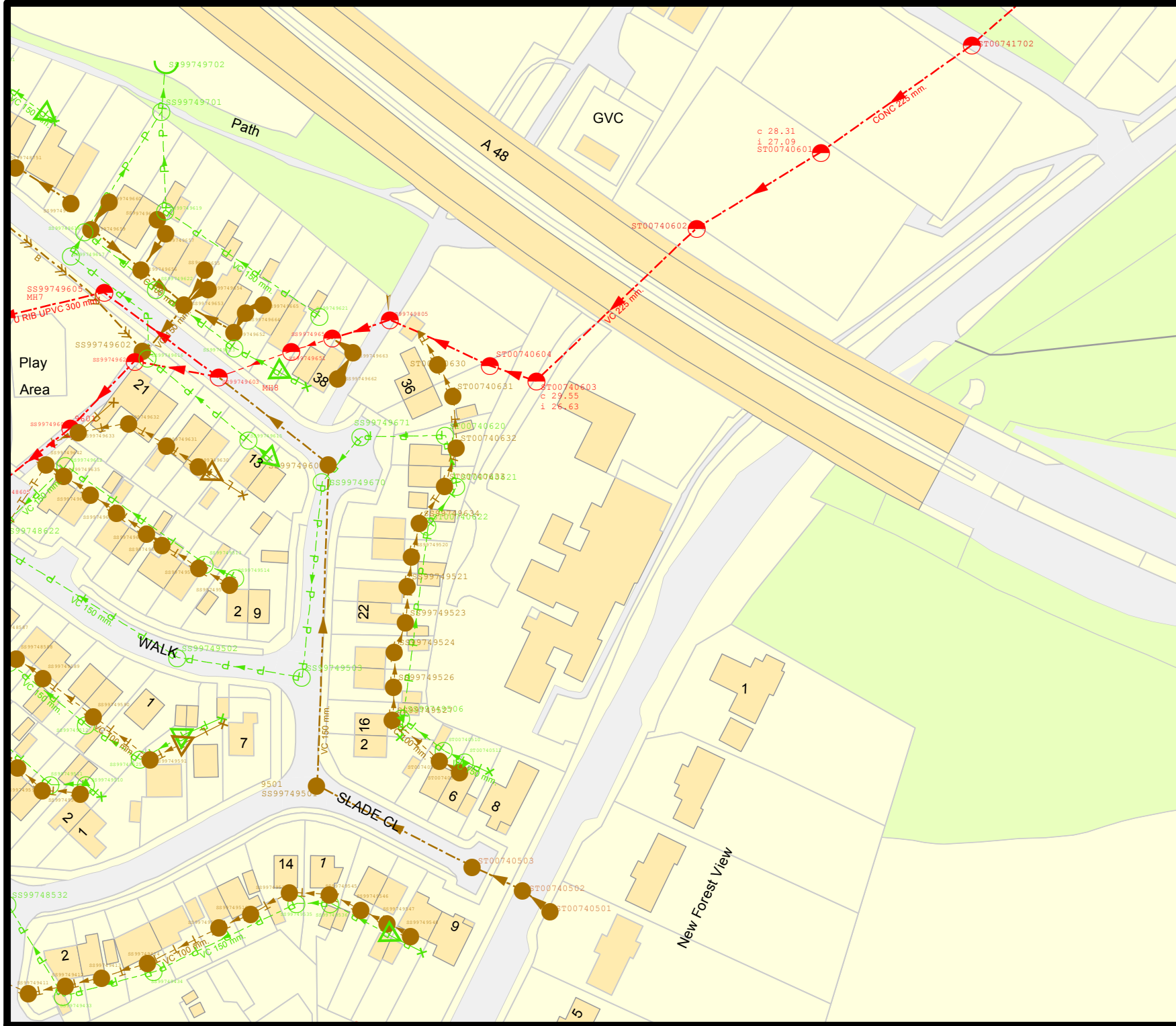
Whilst every reasonable effort has been taken to correctly record the pipe material of DCWW assets, there is a possibility that in some cases pipe material (other than Asbestos Cement or Pitch Fibre) may be found to be asbestos cement (AC) or Pitch Fibre (PF). It is therefore advisable that the possible presence of AC or PF pipes be anticipated and considered as part of any risk assessment prior to excavation.

Dŵr Cymru Cylchgrwyd (the Company) agrees this information as to the position of its underground apparatus by way of general guidance only and on the understanding that it is based on the best information available and is not warranty as to its correctness in the event of excavations or other works made in the vicinity of the company's apparatus. The error of locating apparatus before carrying out any excavations will be entirely on you. The information which is supplied by the Company is done so in accordance with statutory requirements of sections 103 and 109 of the Water Industry Act 1991 which is based upon the best information available and, in particular, but without prejudice to the generality of the foregoing, it should be noted that the records that are available to the Company may not disclose the whereabouts of water mains, surface water, lateral drains or disposal main and any electrical apparatus laid before 1 September 1980, or, if they do, the direction of their position and depth may not be accurate. It must be understood that the furnishing of this information is entirely without prejudice to the provisions of the New Roads and Street Works Act 1991 and the Company's liability is compensated for any errors to be expected.

EXACT LOCATIONS OF ALL APPARATUS TO BE DETERMINED ON SITE.

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Map Ref: 300042,174609
Map scale: 1:1250
Printed by: Williams Gillian
Printed on: 30 Nov 2018





**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

**Ein cyf/Our ref: CAS-71425-M9X5
Eich cyf/Your ref: n/a**

Rivers House
St Mellons Business Park
Fortran Road
Cardiff
CF3 0EY

Ebost/Email:
southeastplanning@cyfoethnaturiolcymru.gov.uk
Ffôn/Phone: 03000 653 055

LRM Planning
22 Cathedral Road
Cardiff
CF11 9LJ

FAO: Steffan Harries

06 December 2018

Annwyl Syr/Madam / Dear Sir/Madam

**STATUTORY PRE-APPLICATION CONSULTATION - TOWN AND COUNTRY
PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (WALES) (AMENDMENT)
ORDER 2016.**

**Proposed full planning consent for the demolition of existing buildings and
development of 48 dwellings and associated works at Aberthin Road, Cowbrdige,
CF71 7EN**

Thank you for sending us a requisite notice under Article 2D of the above Order. We received a copy of your proposed application, plans and other supporting documents on 12 November 2018.

We have significant concerns with the proposed development as submitted. We recommend that the Local Authority should only grant planning permission if the scheme can meet the following requirement. We would object if the scheme does not meet this requirement.

Requirement- European protected species - further information is required to demonstrate the proposal will not be detrimental to the maintenance of the favourable conservation status of Bats, a European protected species.

Bats (European Protected Species)

We have reviewed the bat report, produced by Solstys Brewster, dated November 2018, that was submitted in support of the above pre-application. We note from this report that a number of species; pipistrelles, brown long eared, Myotis and lesser horseshoe, have been found to be using the building on site. However, at this stage, insufficient information has been provided to demonstrate the proposal will not be detrimental to the maintenance of the favourable conservation status of Bats, a European protected species. As currently presented, we do not have sufficient information to provide you with advice on the bat mitigation proposed. Further detail is set out below.

- Section 5.4 of the above report recommends that '*additional survey work is carried out over the winter period*'. We agree with this and this survey will need to be carried out prior to the submission of a planning application and should be used to inform the mitigation strategy for the site.
- The report also refers to previous bat surveys, undertaken by David Clements Ecology, dated 2017, however that bat survey report has not been provided. That information needs to be submitted to support an application.
- Further bat survey will be necessary to allow assessment of the likely effects on bats and appropriate mitigation. Therefore, we advise that you discuss the requirements of further surveys with the Local Authority's ecologist, to ensure an appropriate level of survey work to inform the application.
- Section 3.16 of the report identifies the presence of a lesser horseshoe hibernation roost immediately adjacent to the site, under the A48 flyover. However, no further details have been provided on the status of this roost or the potential impact of this development on this roost. We would advise that this information should be included with any future submissions.
- We note that section 5.5 states that further information on a '*purpose built bat house*' is located in Appendix v, however we could not find any document under appendix v in the report. We cannot provide advice on the proposed mitigation, as shown in the 'Proposed Bat roost, Drawing Number: 3703/PA/020, dated Nov 2018 and Proposed Site Layout Drawing Number 3703/PA/010, dated Nov 2018, without receiving the results of all surveys on the site. We advise that a detailed mitigation strategy would need to be submitted upfront in support of any planning permission sought. Mitigation should be appropriate and proportionate to the bat species and roost types on site.
- Notwithstanding the previous point, where a bat house is being provided the drawings should clearly include the dimensions and volume of the space available to bats, details of the construction materials such as slate roof, traditional bitumen 1F roofing membrane, double skin walls, and multiple access points of a type suitable for requirements of the bat species concerned. The submitted drawings do not currently include this information. With regards to the location of a bat house, proper consideration should be given to identifying flight lines used on the site and ensuring that these are retained within the development. Normally, a bat house should be located along the flight line currently used by the relevant bat species and located away from busy high traffic areas. We would also expect measures to look at security for the building, including ensuring no access by people, but also measures to ensure that predators are unable to access the building.
- A lighting and landscaping plan would need to be submitted with a planning application. This should look to reduce lighting over the site as a whole and avoid lighting completely in proximity to the bat house and the boundaries of the site, ensuring that a vegetated dark corridor would be maintained to the bat house which

connects to the wider landscape. The plans should also include; the type of luminaire (including the exact specification), the location and height of the luminaire.

- Please note, where a bat house has been created as mitigation for the loss of a lesser horseshoe maternity roost, evidence would potentially need to be submitted indicating the bat house is being used in this capacity prior to any works being permitting to the existing roost.
- The site layout plan identifies several trees to be removed as part of the development of the site. This may impact bats and therefore a Potential Roost Feature (PRF) survey will need to be carried out on any trees to be affected by the development. Any trees identified as moderate potential or higher for roosting bats will require climbing/endoscope inspections. Any surveys must be carried out by experienced, licensed ecologists, and the results should be submitted upfront in support of any planning permission sought.

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance. We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents relevant to their development. Please refer to our [website](#) for further details.

Please note, if further information is prepared to support an application, it may be necessary for us to change our advice in line with the new information.

Further advice can be provided prior to your planning application being submitted however, there would be a charge for this service. Further details are available on our website.

If you have any further queries, please don't hesitate to contact us.

Yn gywir / Yours faithfully

Helen Griffiths

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor
Cyfoeth Naturiol Cymru | Natural Resources Wales

Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy. | Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably.

Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi. | Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



Llywodraeth Cymru
Welsh Government

Plas Carew, Uned 5/7 Cefn Coed
Parc Nantgarw, Caerdydd CF15 7QQ
Ffôn 0300 025 6000
Epost cadw@llyw.cymru
cadw.gov.wales

Plas Carew, Uned 5/7 Cefn Coed
Parc Nantgarw, Caerdydd CF15 7QQ
Ffôn 0300 025 6000
Epost cadw@llyw.wales
cadw.gov.wales

Steffan Harries
LRM planning

Steffanharries@lrmpanning.com

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

10 December 2018

Linell uniongyrchol
Direct line

03000 257894

Epost
Email:

amadminplanning@gov.wales

Dear Mr Harries

Pre-Planning Application – Proposed residential development at Aberthin Road, Cowbridge, Vale of Glamorgan

Thank you for your letter of 12 November 2018 inviting our comments on the statutory pre-planning application consultation for the proposed development as described above. The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application.

Advice

Having carefully considered the information provided with this pre-planning application, we have no objections to the proposed development in terms of the likely impact on any designated or registered assets.

However, as you know, we have recently visited the site to carry out a full inspection of the former high school following several requests for it to be listed. We are currently assessing the building against the listing criteria and will write to you again as soon as we make a final decision.

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

Mae Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



National Policy

Applications for planning permission are considered in light of the Welsh Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW ([Chapter 6 – The Historic Environment](#)) explains that the conservation of archaeological remains is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains, whether scheduled or not, and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in an adverse impact on a scheduled monument (or an archaeological site shown to be of national importance) or has a significantly damaging effect upon its setting. [Technical Advice Note 24: The Historic Environment](#) elaborates by explaining that there is a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of remains.

PPW also explains that local authorities should protect parks and gardens and their settings included in the first part of the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.

Finally, there may also be undesignated historic assets that could be affected by the proposed development and, if you have not already done so, we would advise that you consult the Historic Environment Record held by The Glamorgan-Gwent Archaeological Trust Ltd, Heathfield House, Heathfield, Swansea SA1 6EL.

Yours sincerely

Nick Segust
Diogelu a Pholisi / Protection and Policy