

# **PLANNING STATEMENT**

## **Land West of Windmill Lane (Bryn Melin), Cowbridge**

**CarneySweeney**

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## Contents

1.0	Introduction .....	2
2.0	The Application Site and Surroundings .....	3
3.0	Proposed Development.....	6
4.0	Planning Policy Framework .....	8
5.0	Planning Policy Assessment of the Proposals.....	18
6.0	Summary and Conclusion .....	30

## Appendices

Appendix 1 – Site Location Plan

Appendix 2 – Pre-Application Responses

Appendix 3 - Planning Policy Wales 11 – National Sustainable Development Placemaking Appraisal Framework Assessment



## 1.0 INTRODUCTION

1.1.1 This Planning Statement has been prepared on behalf of Redrow Homes (South Wales) Ltd in support of a Full Planning Application for the:

*“Residential development of up to 105 dwellings, open space and associated highway and drainage infrastructure”.*

1.1.2 A plan which includes the development boundaries is included at **Appendix 1**.

1.1.3 Extensive pre-application advice has been sought from Vale of Glamorgan Council (ref: 2020/00078/PRE) and the content of the discussions are reflected in the content of the planning application.

1.1.4 This Planning Statement supports the planning application and comprises the following title sections:

- **Section 1: Introduction** – introduces the applicant and the basic principle of the proposals and sets out the structure of the statement.
- **Section 2: The Application Site and Surroundings** – describes the characteristics of the application site.
- **Section 3: Proposed Development** – describes the proposals in detail.
- **Section 4: Planning Policy Framework** – sets out the relevant national and local planning policy framework applicable to the proposed development.
- **Section 5: Assessment of the Proposals** – assesses the proposed development against the relevant planning policy framework detailed in Section 4 having regard to all material considerations, concluding that the proposed development should be granted planning permission.
- **Section 6: Conclusions** – concludes and summarises the preceding sections.

1.1.5 This planning application is supported by a number of technical documents and this Planning Statement should be read in conjunction with them.



## 2.0 THE APPLICATION SITE AND SURROUNDINGS

- 2.1.1 The application site extends to approximately 3.9 hectares and is located to the south-east of Cowbridge town centre between Windmill Lane and St Athan Road.
- 2.1.2 The site is broadly rectangular in shape and comprises an area of undeveloped grazing land which is bounded in areas by hedgerows and scattered low quality trees. The site does not have an even topography and generally slopes south-eastwards towards St Athan Road. The site is directly accessed from St Athan Road via an existing agricultural access. A field gate to the site is also present off Windmill Lane. A public right of way runs through the site.
- 2.1.3 The site is bounded to the north and west by existing residential properties located along Llanquian Close, Bessant Close and Windmill Lane respectively. St Athan Road bounds the site to the east and open countryside is located to the south.
- 2.1.4 The site is located within a highly sustainable and accessible location by walking, cycling or public transport. There are bus stops located on Primrose Hill and High Street which provide routes to Cardiff, Porthcawl, Talbot Green and Llantwit Major.
- 2.1.5 In terms of the natural and built environment, the site does not include any statutory nature conservation, built heritage, archaeological or landscape designations. The site is however located adjacent to two mineral safeguarding areas and the Upper and Lower Thaw Valley Special Landscape Area (SLA).
- 2.1.6 The site is located in Flood Zone A and is therefore considered to be at little risk of fluvial or coastal/tidal flooding.

## 2.2 Planning History

- 2.2.1 The following planning applications are relevant to the site:
- 1979/00649/OUT: Proposal to develop OS6200 and 7188 for housing on a similar density to Brookfield Park and improve St Athan Road by new road works affecting OS8700, 8492 and 8782. Application Refused.
  - 1978/02402/OUT: Proposal to develop the site for housing on a density similar to Brookfield Park. Application refused.

## 2.3 Pre-Application Discussions

- 2.3.1 Three formal pre-application meetings have been held with Vale of Glamorgan Council during 2020-2022 to discuss the application proposals.



- 2.3.2 The first meeting was held in October 2020 and discussed the highways strategy to access the site, the proposed site layout and mix of affordable units, drainage/surface water strategy for the site, the location of the public open space and general content of any forthcoming planning application and supporting documents.
- 2.3.3 Whilst the proposals were considered acceptable in principle, Vale of Glamorgan Council Officers raised concerns over the proposed layout of the site and its associated development density, permeability and the visual impact of the proposed development given the site's topography. It was also considered that a dedicated area of public open space was required to serve the development and this should be provided adjacent to the existing area of open space at Llanquin Close/Bessant Close.
- 2.3.4 In November 2021, a second pre-application meeting was held to further discuss the development proposals which had been amended to take on board the comments received from the Council. Whilst it was acknowledged that progress had been made in addressing the Council's comments, concerns were again raised regarding the site's proposed layout and its associated development density whereby 84 dwellings were proposed. A greater mix of house types and dispersal of affordable units across the site was also requested. A larger, more focal/central area of public open space was also sought. In acknowledgement of the site's challenging topography, Officers were also keen to ensure any retaining structures didn't dominate the site or make it look 'over engineered'.
- 2.3.5 The third pre-application meeting was held in February 2022. Further amendments to the site layout were presented to Council Officers. Specifically, the proposed house types across the site had been amended to provide a greater mix of house types and sizes. Additional terraces and semi-detached units had also been included to increase the range and sizes of houses proposed to provide 87 units. Affordable units had been further dispersed across the site. The proposed area of public open space linking into Llanquian Close had been enlarged and a LEAP is accommodated. The siting of units had also been altered where necessary to ensure all units can be accommodated given the engineering difficulties the site presents. Landscaped embankments had also been included in-between back-to-back facing units to reduce the requirement for large retaining walls between units, providing a softer, more landscaped engineering approach across the site.
- 2.3.6 The advice received to date therefore confirms that the principle of the development is acceptable but highlights that development density, landscaping and visual impact of the proposed development are key considerations in the determination of any planning



application. The submitted development proposals have taken on board all the pre-application comments received. A response to each of the key issues arising from the extensive pre-application discussions that have taken place is set out in Section 5 of this Statement.

- 2.3.7 The formal pre-application responses are enclosed at **Appendix 2** to this Planning Statement.



## 3.0 PROPOSED DEVELOPMENT

### 3.1 Submitted Development Proposals

3.1.1 The planning application seeks full planning permission for the following:

*“Residential development of up to 105 dwellings (including affordable housing), open space, landscaping and associated highway and drainage infrastructure”.*

3.1.2 In essence, the proposed development comprises of the following key elements:

- Up to 105 no. residential dwellings comprising a mix of 1-5 bed market and affordable units;
- Newly upgraded vehicular access from St Athan Road;
- Provision of public open space and links to an area of existing public open space at Llanquian Close;
- Associated drainage and surface water/SUD’s infrastructure and features;
- Upgrading the public right of way to Windmill Lane.

3.1.3 The proposed development framework for the site has been developed in response to the highly challenging nature of its topography. Levels across the site vary significantly especially where the land descents steeply from west to east across the site and down towards the southern boundary. As such, detailed engineering assessments and investigations have taken place to inform the practical development of the site and to ensure the feasibility of the proposals. The associated engineering solutions are reflected and incorporated into the proposed site layout.

3.1.4 The development makes provision for both market and affordable housing in a mix of house types and sizes. The houses will be set within a new landscape framework providing new and improved pedestrian, cycle and highways connections into the surrounding area to the north, east and west. In particular, a newly upgraded vehicular access will be provided from St Athan Road in the form of a priority junction with St Athan Road. The proposals also include the realignment of St Athan Road to the west of its existing alignment to improve the forward visibility and the road horizontal alignment. Improved pedestrian and cycle links will be provided to Windmill Lane.

3.1.5 A new large, centralised area of open space containing a Local Equipped Area of Play (LEAP) will be provided on site framed by adjoining houses to ensure natural surveillance of the open space. The area of open space will also connect to the existing area of open space located to the north of the site at Llanquian Close to provide an opportunity to





create an enlarged and more useable area of open space for the benefit of existing and future residents.

- 3.1.6 A strong landscape buffer along the site's southern and eastern boundary will be provided.
- 3.1.7 It is proposed that the pumping station and attenuation feature are positioned outside of the formal allocation boundary, this is proposed due to topographical challenges facing the engineering development and construction of the site coupled with the new requirements of SuDS. The requirement for surface water storage coupled with cleansing and controlling the flows of water across a development site is very challenging particularly on sites with steep gradients. By positioning the attenuation basin and pumping station outside of the allocation boundary not only positions the basin in an optimal position at the lowest point of the site; therefore ensuring SAB compliance, but it also helps to increase the site's net developable area which is already been impacted due to the necessity of additional SuDS features, embankments and retaining walls which are required to make the development of the site feasible.



## 4.0 PLANNING POLICY FRAMEWORK

### 4.1 Introduction

- 4.1.1 The following section provides an overview of the relevant policy framework relating to the application proposals. In accordance with S38(6) of the Planning and Compulsory Purchase Act 2004 this application should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 4.1.2 The starting point is therefore the Development Plan which consists of the Vale of Glamorgan Council Local Development Plan (LDP) 2011-2026, which adopted on 28th June 2017.
- 4.1.3 In addition to the above, other key 'relevant material considerations' include, in particular, Government policy guidance contained within Planning Policy Wales (PPW) (Edition 11), Future Wales: The National Plan 2040, associated Technical Advice Notes (TANs) and the Well-Being of Future Generations (Wales) Act 2015.

### 4.2 Local Development Plan Policy

#### Vale of Glamorgan Council Local Development Plan (LDP) 2011-2026

- 4.2.1 The application site forms the western portion of land allocated under Local Development Plan (LDP) Policy MG 2 (19) at Land adjoining St Athan Road, Cowbridge. The total allocation makes an allowance for 130 units on the basis of a total site size of 4.3ha.
- 4.2.2 The supporting text to LDP Policy MG2 outlines that generally a gross density figure of 30dph has been proposed for each allocated site to reflect the Council's aspirations to make better use of land with sustainability principles which is reinforced by Housing Density Policy MD6.
- 4.2.3 The LDP proposals map also identifies that the site lies outside but adjacent to the Upper & Lower Thaw Valley Special Landscape Area. As such LDP Policy MG17 (Special Landscape Areas) outlines that development proposals will be permitted where it is demonstrated they would cause no unacceptable harm to the important landscape character of the area. An LVIA will be required to fully consider the impact of any development on the SLA.
- 4.2.4 Other LDP Policies of relevance to the application proposals include:
- Policy SP7: 'Transportation' outlines that sustainable transport improvements that serve the economic, social and environmental needs of the Vale of Glamorgan and



promote the objectives of the South East Wales Regional Transport Plan and the Local Transport Plan will be favoured.

- Policy SP10: 'Built and Natural Environment' which states that development proposals must preserve and where appropriate enhance the rich and diverse built and natural environment and heritage of the Vale of Glamorgan.
- Policy MG4 (Affordable Housing) outlines that residential developments in Cowbridge which result in a net gain of 1 dwelling or more will be required to provide 40% affordable housing. The policy goes on to state that on sites of 10 or more dwellings, affordable housing shall be provided on site unless exceptional circumstances are demonstrated, with the requirement being rounded up to the nearest whole number.
- Policy MD2 'Design of New Development' which seeks to create high quality, healthy, sustainable and locally distinct places and as such development proposals should (inter alia): be of a high standard of design (criterion 1 refers), respond appropriately to the local context and character of neighbouring buildings and uses (criterion 2 refers), provide a safe and accessible environment for all users giving priority to pedestrians, cyclists and public transport users (criterion 5 refers), have no unacceptable impact on highway safety, nor cause or exacerbate existing traffic congestion (criterion 6 refers), conserve and enhance the quality of, and access to, existing open spaces and community facilities (criterion 7 refers), safeguards existing public and residential amenity (criterion 8 refers), provide public open, private amenity space and car parking in accordance with the Council's standards (criterion 9 refers), incorporate sensitive landscaping (criterion 10 refers) and mitigate the causes of climate change by minimising carbon and other greenhouses gas emissions and predicted future effects of climate change (criterion 12 refers).
- Policy MD3: 'Provision for Open Space' states that where there is an identified need of public open space, new residential development with a net gain of 5 or more dwellings will be required to provide public open space in accordance with adopted standards.
- Policy MD4: 'Community Infrastructure and Planning Obligations' outlines that where appropriate and having regard to development viability the Council will seek to secure new and improved community infrastructure, facilities and services appropriate to the scale, type and location of proposed development through the use of planning obligations.



- Policy MD6: ‘Housing Densities’ states that residential development proposals within the key service and primary settlements will be permitted where the net residential density is a minimum of 30 dwellings per hectare. Lower density levels will only be permitted where it can be demonstrated that:
  - 1) Development at the prescribed densities would have an unacceptable impact in the character of the surrounding area;
  - 2) Reduced densities are required as a result of significant site constraints or to preserve a local amenity feature; and
  - 3) The proposal is for a mixed-use development where residential use is the subordinate element.
  
- Policy MD7: ‘Environmental Protection’ requires development proposals to demonstrate that they will not result in an unacceptable impact on people, residential amenity, property and/or the natural environment from a number of factors including the pollution of land, surface water, ground water and the air; land contamination; hazardous substances; noise, vibration, odour nuisance and light pollution; flood risk and consequences; coastal erosion or land stability; loss of the best and most versatile agricultural land; or any other identified risk to public health and safety. Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level.
  
- Policy MD8 ‘Historic Environment’ outlines that development proposals must protect the qualities of the built and historic environment of the Vale of Glamorgan. In relation to sites of archaeological interest, development proposals must preserve or enhance archaeological remains and where appropriate their settings.
  
- Policy MD9: ‘Promoting Biodiversity’ outlines that new development proposals are required to conserve and where appropriate enhance biodiversity interest unless it can be demonstrated that (1) the need for the development clearly outweighs the biodiversity value of the site and (2) the impacts of the development can be satisfactorily mitigated and managed.

## 4.3 National Legislation and Policy

### Future Wales: The National Plan 2040

- 4.3.1 Future Wales is the national development framework for Wales with development plan status. The document sets the direction for development in Wales up to 2040. The plan



includes a strategy for addressing key national priorities through the planning system, including sustaining and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems and improving the health and well-being of our communities.

4.3.2 Future Wales provides a framework for regional planning to tackle regional inequalities and ensure that the most prosperous parts of Wales play a role in supporting their wider regions. The proposed development falls within the ‘South East’ region. Future Wales is a framework which will be built on by Strategic Development Plans at a regional level and Local Development Plans at local authority level.

4.3.3 Policy 2 of FW relates to ‘Shaping Urban Growth and Regeneration – Strategic Placemaking’. It states that the growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.

4.3.4 Urban growth and regeneration should be based on the following strategic placemaking principles:

- creating a rich mix of uses;
- providing a variety of housing types and tenures;
- building places at a walkable scale, with homes, local facilities and public transport within walking distance of each other;
- increasing population density, with development built at urban densities that can support public transport and local facilities;
- establishing a permeable network of streets, with a hierarchy that informs the nature of development;
- promoting a plot-based approach to development, which provides opportunities for the development of small plots, including for custom and self-builders; and
- integrating green infrastructure.

#### Well-being of Future Generations Act 2015

4.3.5 The Well-being of Future Generations (Wales) Act 2015 places a duty on public bodies to place the principles of sustainability and sustainable development at the heart of its decision-making processes. The objectives of the Act are as follows:



## ***“A Prosperous Wales”***

- *Promoting resource-efficient and climate change resilient settlement patterns which minimise land take and urban sprawl, especially through the reuse of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites;*
- *Play an appropriate role to facilitate sustainable building standards;*
- *Play an appropriate role in securing the provision of infrastructure to form the physical basis for sustainable communities;*
- *Support initiative and innovation and avoid placing unnecessary burdens on enterprises so as to enhance the economic success of both urban and rural areas, helping businesses to maximise their competitiveness;*

## ***“A Resilient Wales”***

- *Contributing to the protection and improvement of the environment, so as to improve the quality of life, and protect local and global ecosystems;*

## ***“A Healthier Wales”***

- *Contribute to the protection and, where possible, the improvement of people’s health and well-being as a core component of achieving the well-being goals and responding to climate change;*

## ***“A More Equal Wales”***

- *Promoting access to, inter alia, employment, shopping, education and community facilities and open and green space, maximising opportunities for community development and social welfare;*
- *Promote quality, lasting, environmentally-sound and flexible employment opportunities;*
- *Respect and encourage diversity in the local economy;*

## ***“A Wales of Cohesive Communities”***

- *Locating development so as to minimise the demand for travel, especially by private car;*
- *Fostering improvement to transport facilities and services which maintain or improve accessibility to services and facilities, secure employment, economic and environmental objectives, and improve safety and amenity;*



- *Fostering social inclusion by ensuring that full advantage is taken of the opportunities to secure a more accessible environment for everyone that the development of land and buildings provides. This includes helping to ensure that the development is accessible by means other than the private car;*

***“A Wales of Vibrant Culture and Thriving Welsh Language”***

- *Helping to ensure the conservation of the historic environment and cultural heritage;*
- *Positively contribute to the well-being of the Welsh language;*

***“A Globally Responsive Wales”***

- *Support the need to tackle the causes of climate change by moving towards a low carbon economy.”*

Planning Policy Wales Edition 11 (February 2021)

- 4.3.6 PPW was revised in February 2021 to set out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.
- 4.3.7 Figure 5 of PPW identifies five key planning principles and national sustainable placemaking outcomes as follows:
- Growing our economy in a sustainable manner;
  - Making better use of resources;
  - Facilitating accessible and healthy environments;
  - Creating and sustaining communities; and
  - Maximising environmental protection and limiting environmental impact.
- 4.3.8 Placemaking forms the core of PPW11 and must be embraced in development management decisions to achieve the creation of sustainable places. An assessment of the development proposals in respect of each of the PPW11 Placemaking Outcomes is included at **Appendix 3**.
- 4.3.9 PPW11 specifies that: ‘The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly.



Development proposals should create the conditions that bring people together, making them want to live, work and play in areas with a sense of place and well-being, creating prosperity for all' (Paragraph 2.3 refers).

- 4.3.10 Figure 7 of PPW sets out how development proposals should be assessed. Stage 1 should assess the proposal against the "Strategic and Spatial Choices". Stage 2 should assess the detailed impact and contribution the proposal will make to "Active and Social Places", 'Productive and Enterprising Places' and 'Distinctive and Natural Places'. PPW is clear that the considerations within each of the themes will vary on a case-by-case basis, depending on the proposal concerned but, that the merits or otherwise of a proposal need to be considered in the public interest. Approaching a proposal in this manner should result in a proposal that contributes to the sustaining of or creation of sustainable places, thereby delivering on the national sustainable placemaking outcomes.
- 4.3.11 The plan-led system underpins the delivery of sustainable places. PPW11 outlines in paragraph 1.18 that a plan-led approach is the most effective way to secure sustainable development through the planning system. Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural and environmental issues are balanced and integrated.
- 4.3.12 PPW outlines the Welsh Government's duty under the Well-being of Future Generations (Wales Act) 2015 (WBFGA 2015) to deliver sustainable development: "Sustainable Development" means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals (PPW page 7).
- 4.3.13 Chapter 3 'Strategic and Spatial Choices' is centred on good design and its fundamental contribution to creating sustainable places where people want to live and work. Paragraph 3.3 of PPW indicates that design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic.
- 4.3.14 Chapter 4 covers the theme of 'Active and Social Places'. A key issue for this theme is ensuring there is sufficient housing land available to meet the need for new private market and affordable housing.
- 4.3.15 Paragraph 4.1.50 advises that parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of





reducing reliance on the private car and supporting a modal shift to walking. Furthermore, paragraph 4.1.51 stipulates planning authorities must support schemes which keep parking levels down, especially off-street parking.

4.3.16 Paragraph 4.2.1 requires planning authorities to understand all aspects of the housing market in their areas including the requirement, supply and delivery of housing.

4.3.17 Chapter 5 'Productive and Enterprising Places' deals with a, amongst other themes, making best use of material resources and promoting the circular economy. Placemaking embraces the inter-relationships between the built and natural environment. Choices about the use of material resources should be based on making the most appropriate and sustainable use of finite resources and promoting the principals of a circular economy.

4.3.18 Chapter 6 'Distinctive & Natural Places' states that non-statutory designations, such as Special Landscape Areas or Sites of Importance for Nature Conservation, should be soundly based on a formal scientific assessment of the nature conservation, landscape or geological value of the site. It confirms that non-statutory designations carry less weight than statutory designations although they should be given adequate protection in the development management process. It is stated, however, that such designations should not unduly restrict acceptable development.

4.3.19 Paragraph 6.2.10 states that Planning authorities should ensure that development minimises impact and provides opportunities for enhancement within areas identified as important for the ability of species to adapt and/or to move to more suitable habitats.

4.3.20 PPW states that the sustainable transport hierarchy (Figure 9) must be a key principle when considering and determining planning applications. When determining a planning application for development that has transport implications, local planning authorities should take into account the provisions of the Active Travel (Wales) Act 2013.

#### Technical Advice Notes

4.3.21 Technical advice notes provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans. The relevant technical advice notes to this proposed development are as follows;

#### TAN 5: Nature Conservation and Planning (2009)

4.3.22 TAN 5 provides advice about how the land use planning system should contribute to protecting and enhancing biodiversity and geological conservation in particular on :

- The key principles of positive planning for nature conservation;
- Nature conservation and Local Development Plans;



- Nature conservation in development management procedures;
- Development affecting protected internationally and nationally designated sites and habitats; and
- Development affecting protected and priority habitats and species.

## Technical Advice Note 12: Design (2016)

4.3.23 Technical Advice Note (TAN) provides advice on design considerations and, in relation to housing design, it states that local planning policies and guidance should aim to:

- create places with the needs of people in mind, which are distinctive and respect local character;
- promote layouts and design features which encourage community safety and accessibility;
- focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;
- avoid inflexible planning standards and encourage layouts which manage vehicle speeds through the geometry of the road and building;
- promote environmental sustainability features, such as energy efficiency, in new housing and make clear specific commitments to carbon reductions and/or sustainable building standards;
- secures the most efficient use of land including appropriate densities; and
- consider and balance potential conflicts between these criteria.

## Technical Advice Note 18: Transport (2007)

4.3.24 TAN 18 highlights the role that integrating land use planning and development of transport infrastructure can play in addressing the environmental aspects of sustainable development. Paragraph 2.3 sets out how integration can help Welsh Government achieve wider sustainable development policy objectives through a number of measures:

- Ensuring new development is located where there is, or will be, good access by public transport, walking and cycling, to minimise the need for travel;
- Managing parking provision – using maximum car parking standards as a form of demand management;
- Encouraging the location of development near other related uses to encourage multi-purpose trips;
- Promoting cycling and walking; and
- Supporting the provision of high quality, inclusive public transport.

4.3.25 Section 7 of TAN 18 is concerned with public transport. Paragraph 7.1 acknowledges that



new and improved public transport provision has the potential to provide alternatives to private vehicle use and to change existing travel demands. It states further that where enhanced public transport services or infrastructure is necessary to serve new development, but provision on a commercial basis is not viable, a developer contribution may be appropriate.



## 5.0 PLANNING POLICY ASSESSMENT OF THE PROPOSALS

### 5.1 Key Considerations

5.1.1 Having regard to the nature of the development proposals, it is considered that the issues of relevance in the consideration of the application proposals are as follows:

- Response to Pre-App Comments
- Site Design and Layout
- Highways Considerations
- Drainage Strategy
- Ecology and Biodiversity
- Landscape and Visual
- Archaeological Considerations

### 5.2 Response to Pre-Application Comments

5.2.1 A response to each of the key issues arising from the latest pre-application discussions and how the development proposals have been revised in response to them are set out in the table below:

LPA Comments	Response
<p>Justification required for the pumping and attenuation basin not being included in the allocation boundary.</p>	<p>It is proposed that the pumping station and attenuation feature are positioned outside of the formal allocation boundary. This is proposed due to topographical challenges facing the engineering development and construction of the site coupled with the new requirements of SuDS. The requirement for surface water storage coupled with cleansing and controlling the flows of water across a development site is very challenging particularly on sites with steep gradients. By positioning the attenuation basin and pumping station outside of the allocation boundary not only positions the basin in an optimal position at the lowest point of the site; therefore ensuring SAB compliance, but it also helps to increase the site’s net developable area which is already been impacted due to the necessity of additional SuDS features, embankments and retaining walls which are required to make the development of the site feasible. As outlined below,</p>



	<p>maximising the number of units to be delivered on the site has already been a challenge.</p>
<p>Development density is considered to be too low in respect of the provision of 87 units with too many detached market homes proposed on site.</p>	<p>In response to the Council's comments, Redrow Homes have revised the mix of units on site and are now proposing 105 dwellings to be delivered on site. This has been achieved through the substitution of a number of the market detached units to smaller and semi-detached market units. There is a subtle transition between smaller and larger house types within the site layout and the affordable units are better dispersed within the site. Overall, the site provides for a significantly more varied mix and tenure of homes compared to those which adjoin the site, as requested by the LPA.</p> <p>It is however contended that the expectations for the number of dwellings to be delivered on this allocated site, as outlined by the LDP, did not make an allowance for the site's significant topographical challenges which, in addition to the now mandatory SAB requirements that have come in effect since the LDP was adopted, would make the delivery of any more units very difficult. In any case, the layout as submitted for 105 dwellings is considered acceptable and fully justifiable while delivering over 30 dwellings per net hectare.</p> <p>We therefore trust that the LPA will recognise the efforts Redrow Homes have gone to in order to increase unit numbers across the site.</p>
<p>Affordable housing appears cramped and grouped together on site.</p>	<p>The revisions made to the site layout now mean that the affordable units are well mixed throughout the site and relate well to the other linked and semi-detached market homes. All of the affordable units are designed to meet DQR standards and are all therefore of an appropriate size and have their own on plot parking to integrate with the market units across the site.</p>
<p>Public open space provision does not meet the Council's standards. POS should be a focal point on site.</p>	<p>Whilst it is recognised the development scheme falls short on the amount of POS required by the Council's standards, the POS that has been incorporated within the site has been thoughtfully designed to form a centralised focal point within the development and will contain a well-equipped LEAP. The POS will be framed by adjoining houses to ensure natural surveillance of the open space. The POS will also connect to the existing area of under-utilised open space located to the north of the site at Llanquian</p>



	<p>Close to provide an opportunity to create an enlarged and more useable area of play space for the benefit of existing and future residents. The connectivity and usability of the adjacent areas of open space will therefore be much improved.</p>
<p>Visual impact of the scheme when viewed from the south.</p>	<p>The design of the site has evolved to ensure that any topographical differences in height across the site are accommodated as naturally as possible and not over engineered. As such, landscaped bunds are incorporated where possible instead of large retaining walls.</p> <p>An LVIA has been undertaken in support of the development proposals and concludes that the development of the site can be accommodated successfully within the landscape and when viewed from the south, it will sit within the context of surrounding existing dense residential development.</p>
<p>Preference for a more permeable layout.</p>	<p>The latest design for the site provides both visual and physical connections through the site. The scheme will allow pedestrian and cycle connectivity along Windmill Lane and through the Brookfield Park estate to the north providing new residents with safe and convenient routes into Cowbridge town centre.</p> <p>As requested by the LPA, the attenuation basin has been better integrated within the scheme and a footpath runs around its exterior to provide additional connectivity and walking routes.</p> <p>The development proposals are also supported by a Transport Assessment and Travel Plan which demonstrate that the site is well-located and sustainable which, in transport terms, is policy compliant with both national and local transport policies.</p>
<p>Required supporting information should include:</p> <ul style="list-style-type: none"> <li>- Archaeological evaluation</li> <li>- Design-and-access statement;</li> <li>- Drainage strategy and plans (foul water and surface water);</li> <li>- Details of levels and retaining walls /sections</li> <li>- Landscape and visual impact assessment (LVIA);</li> <li>- PAC Report (“Major” applications);</li> </ul>	<p>All the required documentation is included in support of the planning application proposals.</p>



<ul style="list-style-type: none"> <li>- Preliminary ecological assessment (and any other surveys deemed necessary by its author);</li> <li>- Survey of any trees and hedges affected by the proposal;</li> <li>- Biodiversity enhancement scheme;</li> </ul>	
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**5.3 Site Design and Layout**

5.3.1 The application site forms the western portion of land allocated under Local Development Plan (LDP) Policy MG 2 (19) at Land adjoining St Athan Road, Cowbridge for 130 units on the basis of a total site size of 4.3ha.

5.3.2 Whilst it is acknowledged that the LDP’s supporting text for the allocation outlines that ideally the whole site should be planned comprehensively, the land to the east of St Athan road is under third party ownership. Whilst the land to the west of St Athan road (shown on the submitted site location plan) is under two land ownerships, Redrow and the land owners have reached an agreement to jointly bring forward the development as one. No such agreement has been reached with the owners of the land to the east of St Athan road. The remaining area of land to the east of St Athan road does not, therefore, form part of the development proposals at the current time. It is however pertinent to note St Athan road effectively severs the site into two and due to the local topographical characteristics and constraints, it is likely that the two parcels would have to be planned and designed very differently if it was possible to bring them forward together at this time.

5.3.3 In any case, the proposed development ensures that it will not prejudice the ability for the land to the east to come forward at a later date. In particular, the proposed highways arrangements will ensure that the eastern parcel can be provided with a suitable access point to serve any future development (discussed further below).

5.3.4 Given the site’s allocated status, the principle of development on site has been already been accepted.

Site Density

5.3.5 It is recognised that through the pre-application process with the Council, concerns have been raised in relation to the density of development proposed for the site. In the most recent of the 3 pre-app responses (March 2022), the Council’s assessment was based a proposal before it of 87 dwellings. In its response, the Council drew upon LDP Policy MD6 (Housing Densities), which indicates that residential development proposals within the service centre settlements will be permitted where the net residential density is a minimum



of 30 dwellings per hectare. As the pre application proposes 87 dwelling on a site area of 3.82 (ha), the density on site would be well below the 30 dwellings per hectare (dph) required within service centre settlements.

- 5.3.6 The March 2022 pre-app response noted that the whole allocation of 4.3-hectare housing allocation (MG2(19)) is required to provide 130 dwellings. The 3.8-hectare pre-application site accounts for 88% of the allocated area which should allow for 114 dwellings. An 87-dwelling proposal would still result in a shortfall of the overall 130 of the allocated dwellings and still fall short of the 114 that should be accommodated on this parcel. The response went on further to request a better mix of house size with the provision of some smaller or linked groups of market house to increase the density on site, the variety of which can be used to provide a better mix through the site and provide an opportunity for better placemaking. This would also serve to reduce the stark contrast between the market and affordable units in terms of plot sizes and house types.
- 5.3.7 In response to the Council's pre-application comments. the submitted development scheme for the site has been revised and now proposes 105 dwellings for the site, an increase of some 18 units since the last pre-application meeting. Given the significant topographical challenges and the mandatory requirement for SAB within the site, the site has a number of justifiable constraints which effects the net developable area. These considerations must be taken into account when determining the number of units that can realistically be developed on site.

#### LDP Policy Considerations

- 5.3.8 The supporting text to Policy MG1 – Housing Supply in the Vale of Glamorgan sets out that a gross density figure of 30 dwellings per hectare has been used to reflect the Council's aspirations to make better use of land. It goes on to say that where there are known constraints that reduce the net developable area significantly then a lower density has been used and explained in site specific description in Appendix 3. To note that for the allocation in question (MG2(19)) no consideration for a lower density is mentioned, when given the significant site constraints, an appropriate allowance should have been made within the LDP. As such, it is considered that a 'blanket' 30dph is not appropriate when considering the development potential of this site.
- 5.3.9 Furthermore, since the LDP was adopted, a notable change has been the mandatory introduction for a SUDs design and approval by the SAB. Whilst surface water drainage has always been dealt with for developments the hierarchical approach now means that additional land is required for SUDs and on sites with steep gradients this is more challenging. A disposal to the public drainage system with limited on-site storage is





clearly not an option. Moreover, there is a requirement for surface water storage but then also cleansing and controlling the flows of water (typically underground within highway network previously) across a development site. These factors are a significant constraint impacting the net developable area and beyond more typical constraints such as existing vegetation to be safeguarded. The topographical challenge in engineering development across this site also impacts on the net developable land with embankments/retaining structures to deal with level changes making construction less efficient. The levels challenges faced on this site can be seen within the sections across the site provided within the submitted application documents.

- 5.3.10 Policy MD2 – Design of New Development, requires all new development to ‘respond appropriately to local context and character of neighbouring buildings and uses in terms of use, type, form, scale, mix and density’.
- 5.3.11 In terms of the local context and character of neighbouring buildings there is a variation seen in the immediate surroundings. However, a key factor in terms of local context is that density is well below 30dph. To the west of the site are a varying range of large detached properties set in generous plots. To the north are typically 3/4 bedroom properties of similar form, scale and design. These too are set in generously sized plots with larger than typical frontages. In this local context that the allocated development site sits, the proposed layout is clearly more dense and arguably currently at odds with the type, form, scale, mix and density than seen in the vicinity. The layout clearly has a significantly variable mix of homes from those currently seen in the local context.
- 5.3.12 A big factor of the layout appearing at odds with the local context is by virtue of the affordable housing units and their higher density. In this setting this is noticeable though due to the absence of such housing stock within the local area. The layout provides for 40% targeted affordable housing to DQR standards and in line with other policy aspirations. The pre-application response sets out that the 30dph density achieved by the layout is reliant on the higher density of the affordable housing units. The affordable housing units are designed to be DQR and meet stipulated space requirements to be acceptable by an RSL. In this sense they are what they are. The adopted policy of 30dph does not exclude the consideration of the affordable housing units in its calculation.
- 5.3.13 Policy MD6 - Housing Densities, will permit residential proposals within service centre settlements where the net residential density is a minimum of 30 dwellings per hectare. Lower density levels will only be permitted where it can be demonstrated that development at the prescribed densities would have an unacceptable impact on the character of the surrounding area or reduced densities are required as a result of



significant site constraints or to preserve a feature that would contribute to existing or future local amenity.

- 5.3.14 Policy MD6 recognises that 30dph are required on a net basis. However, the LDP policy refers to 130 dwellings on a gross area basis so is at odds. Many other sites allocated for development in the LDP have realistic net to gross ratios applied and therefore more realistic unit numbers that can be deliverable. It is recognised that this site has more limiting constraints to factor in on a net to gross basis but even so there are constraints that must be appropriately considered, and these should be taken fully into account by the Council when determining the planning application as further set out below.
- 5.3.15 Firstly, it is worth considering the allocation site size. It extends to 4.33ha but this is split over multiple ownerships, includes adopted highway, unregistered land and areas of vegetation. The extent of St Athan Road within the allocation covers an area of 0.06ha. The unregistered land, which will not be developable, covers an area of 0.1ha. Whilst a relatively small area this reduces the real gross area to 4.17ha.
- 5.3.16 The extent of the housing allocation west of St Athan Road and within Redrow's interest extends to a gross area of 3.29ha. Within this there is 0.15ha of vegetation, primarily mature hedgerows, that are being retained as part of the proposals. This reduces the site area to 3.14ha. As seen on the proposed layout though the net developable area is deemed 2.84ha. The net area has excluded the existing vegetation being retained, the SUDs, such as swales and overland drainage features to meet SAB requirements, and the designated POS areas. On a net basis this equates to a density of 37dph. The engineering challenges with the steep nature of this site also means that embankments and retaining structures will be required and positioned between plots. This affects the ability to efficiently construct (e.g. embankments between plots) and therefore will impact on the extent of development possible on such a site.
- 5.3.17 It is acknowledged that an attenuation basin and pump station (required because DCWW will only accept foul flows to a discharge point at an elevated connection point west of Windmill Lane) are indicated outside of the allocation boundary but it is felt that there is sound justification for this given the site constraints. The attenuation basin being positioned at the flatter part of the site has obvious benefits for not creating unsightly engineered embankments on more challenging parts of the development and would also compound the density matter. The creation of the attenuation basis has the advantages of being able to bring biodiversity benefits. Its position and scope for new vegetation planting, including new structured hedgerow along its southern side, means for the ability to create a softer transition/screening between built form and the wider countryside setting



found to the south. Overall, this will be seen as a benefit (to be considered as part of landscape assessment to support formal application), especially in the wider landscape setting.

- 5.3.18 The land outside of the allocation for attenuation and pump station covers an area of 0.45ha. Including this within the gross area (3.29ha) of the allocation to the west of St Athan Road provides a gross area of 3.74ha. With a net area of 2.84ha the net to gross ratio is 75%. This is considered wholly reasonable and especially when considering the overall context outlined above. The net to gross ratio for sites typically falls between 50% and 80% in Redrow's experience and so this site is towards the upper end of this.
- 5.3.19 The scheme as now proposed is at 105 dwellings and as articulated in the Design and Access Statement, the affordable units have been distributed more evenly across the site, and their orientation to the POS improved. In summary, when considering policies MG1, MD2 and MD6 of the LDP, being the key policies consideration for appropriate density for new residential development, it is considered that the layout presented can be found acceptable as justified above delivering over 30 dwellings per net hectare.

## 5.4 Highways Considerations

- 5.4.1 A Transport Assessment (TA) and Travel Plan have been prepared in support of the application proposals in accordance with relevant advice and guidance. The TA has been scoped with the highway officers at the Vale of Glamorgan Council (VoGC).
- 5.4.2 The development masterplan promotes travel choice from the outset where possible by providing links to existing residential areas and the established pedestrian routes. The accompanying Travel Plan will aid in encouraging sustainable travel for short journeys and shared or public travel for longer journeys. First and foremost, the development is designed to reduce the need to travel in the first instance which takes advantage of rapidly accelerating attitudes to home working and local living.
- 5.4.3 Vehicular access to the site will be from St Athan Road via a new priority junction. The junction has the capacity to accommodate the whole allocation of development of 130 dwellings, with significant spare capacity and minimal queuing on St Athan Road.
- 5.4.4 It is considered that the form of the access is the most appropriate for a development of this scale and whilst additionally providing a betterment to the exiting arrangement along this section of St Athan Road, the proposed access arrangement is policy compliant and in keeping with the semi-rural nature of this location. In addition, the proposed access arrangement for this parcel (land to the west of St Athan Road) does not prejudice access to the land on the eastern side of St Athan Road, which also forms part of the overall



residential allocation of 130 units, within the LDP. Any access to the land to the east would however be subject to detailed assessment by the landowner on this site but the proposed access arrangements for the Redrow land will assist in enabling an access to the land to the east by virtue of reducing vehicle speeds on St Athan Road and hence from a highway safety perspective this ought to be beneficial. As such, the development of the proposed application would not prejudice the land to the east being brought forward separately.

- 5.4.5 With the changing nature of travel, which has been accelerated by the Covid-19 events, accounting also for generational mindsets and the changing priorities reflected in policy, the potential to create sustainable travel habits for all residents from the outset is excellent. Therefore, delivery of this site ought to see far fewer vehicular trips than forecasted. It is clear that an ongoing shift in the travel methods of the UK is underway and ongoing. The dominance of the car is gradually being eroded by the pressing need to shift travel patterns towards more sustainable means of travel.
- 5.4.6 In conclusion, it is therefore considered that this is a well-located and sustainable site which, in transport terms, is policy compliant with both national and local transport policies and hence should be acceptable from a transport and highways perspective.

## 5.5 Drainage Strategy

- 5.5.1 The site is located in Flood Zone A and is therefore considered to be at little risk of fluvial or coastal/tidal flooding.
- 5.5.2 In terms of drainage, the development will follow the surface water runoff destination priority levels set out in Standard S1 of the Statutory standards for sustainable drainage systems. The current masterplan and design principles have been led by and designed with sustainable drainage measures in mind.
- 5.5.3 It is considered that the SuDS strategy for the proposed development would not increase the existing level of flooding risk to the immediate surrounding area and will provide betterment for the more extreme storm events.
- 5.5.4 A suitable foul water strategy is proposed which will need to be agreed with DCWW.
- 5.5.5 It is proposed that the pumping station and attenuation feature are positioned outside of the formal allocation boundary, this is proposed due to topographical challenges facing the engineering development and construction of the site coupled with the new requirements of SuDS. The requirement for surface water storage coupled with cleansing and controlling the flows of water across a development site is very challenging



particularly on sites with steep gradients. By positioning the attenuation basin and pumping station outside of the allocation boundary not only positions the basin in an optimal position at the lowest point of the site; therefore ensuring SAB compliance, but it also helps to increase the site's net developable area which is already been impacted due to the necessity of additional SuDS features, embankments and retaining walls which are required to make the development of the site feasible.

## 5.6 Ecology and Biodiversity

- 5.6.1 There are no statutory or non-statutory designated sites within or immediately adjacent to the application site boundary. The nearest statutory designated site is Cors Aberthin SSSI, whilst the nearest nonstatutory designated site is Coed Bach SINC.
- 5.6.2 The site has been subject to ecological survey between 2021-2022 to ascertain the current baseline, identify potential constraints that the emerging development proposals will need to respond to, and moreover establish potential opportunities to deliver enhancement.
- 5.6.3 An extended Phase 1 survey was undertaken in April 2021, with further survey work undertaken in respect of bats, Badgers, breeding birds, Great Crested Newts and Hazel Dormice.
- 5.6.4 Habitat surveys have confirmed that the vast majority of the site comprises intensively grazed, species poor grassland fields, which support limited botanical diversity and offer few opportunities for faunal species. Hedgerows associated with the boundaries were recorded to be of comparatively greater value, but are not considered to be particularly species-rich. Whilst the proposals require the loss of a hedgerow within the central part of the site, the proposals offset losses through the enhancement of retained features, the provision of new native species-rich habitats (such as hedgerows, trees, swales and rain gardens) and the instigation of management with a focus on maximising long-term biodiversity. The survey identified the presence of a large stand of the non-native invasive species Japanese Knotweed on the eastern boundary of the site. The removal of this species would also represent a benefit compared to the existing situation.
- 5.6.5 No evidence to indicate the presence of Hazel Dormice or Great Crested Newt has been recorded within the site or wider area during the specific surveys. Breeding bird surveys have identified that the site is used by a fairly limited assemblage of common bird species typical of such habitats, although no specially protected or notable birds were recorded. An initial ground-level bat appraisal survey identified a small number of trees with potential to support roosting bats; however, detailed aerial inspection survey work using an



endoscope determined that these features were unsuitable to support roosting bats. Bat activity surveys have been undertaken throughout the 2021 survey season and identifies that the site is used by a range of bat species for foraging and commuting. As such and subject to the implementation of the avoidance, mitigation and enhancement measures included within the development proposals, any adverse effects to protected species will be avoided and opportunities for key faunal groups will be retained and moreover enhanced post-development.

- 5.6.6 In conclusion, on the evidence of the ecological surveys undertaken previously and updated surveys taken, it is considered that the application site is not of particularly high intrinsic value from a nature and conservation perspective. The nature and design of the proposed development will ensure that there will be no adverse effects to designated sites, habitats of ecological significance or protected species.

## 5.7 Landscape and Visual

- 5.7.1 A Landscape and Visual Impact Assessment (LVIA) has been prepared in support of the application proposals in accordance with relevant guidance. The LVIA outlines that the proposed development would have minor beneficial effects upon the site, due to the change from improved pastoral grassland to permanent bio-diverse grasslands, built form and associated infrastructure. With regard to the tree and hedgerow resource the proposals would bring about moderate beneficial effects due to removal of some hedgerow and trees, alongside enhancement of existing and extensive addition of new. Other landscape features, such as water features and PRowS would be retained and would not be affected.
- 5.7.2 Although the proposals pose impacts on the high sensitivity receptors (especially given the PRowS inclusion within wider circular walks and trails), these represent a relatively limited visibility from within the wider landscape, and proposals shall sit within the context of surrounding existing dense residential development.
- 5.7.3 The LVIA concludes that the proposed development would be effectively integrated and assimilated into the surrounding landscape/townscape as a consequence of good building design and green infrastructure and would reflect the general character and appearance of the locality. The site shall change from being highly reflective of the adjoining agricultural landscape character to that of the adjoining developed residential character. Siting of built form, along with well-considered landscape mitigation planting measures, shall appropriately limit visibility of proposed built form from surrounding highways and PRow networks, whilst also complementing the character of the adjoining residential and



agricultural landscape. The proposals have been developed to give great consideration to how the built form can appear a well-considered extension to existing development at Cowbridge, creating a redefined developed boundary to Cowbridge.

## 5.8 Archaeology

- 5.8.1 An Archaeological Desk Based Assessment and Geophysical Survey of the site have been undertaken and agreed by the Glamorgan Gwent Archaeological Trust.
- 5.8.2 The desk based assessment concluded that there is a low potential for previously unknown archaeological remains dating to the Palaeolithic, Mesolithic, Neolithic and Bronze Age periods to be encountered at the site, a moderate potential for encountering previously unknown archaeological features or finds of Roman origin, a high potential for remains dating to the Iron Age period, and a very high potential for encountering archaeological remains dating to the medieval period due to the location of two assets dating to this period within the site boundary. The report also outlined that there are three non-designated assets located within the site boundary: an Iron Age bivate hillslope enclosure (HDL203), a Medieval settlement (HDL193), and medieval field boundaries (HDL103).
- 5.8.3 In recognition that the development could result in the loss of three non-designated sites, a geophysical survey was undertaken to further assess the known and potential archaeological features within the site. The survey evaluated the site and successfully confirmed the location of the eastern end of an Iron Age hillslope enclosure, as recorded on the local Historic Environment Record. The main part of the enclosure was however found to lie outside the development site. Findings elsewhere across the site are restricted to two short sections of former field boundaries.



## **6.0 Summary and Conclusion**

- 6.0.1 This Planning Statement has been prepared in support of a full planning application for residential development for up to 105 dwellings, open space and associated highway and drainage infrastructure.
- 6.0.2 An assessment of the development proposals against all relevant national and local planning policy considerations has been undertaken and the proposed development has been found to be in conformity with the Development Plan as a whole through a well-considered proposal on an allocated site that has been subject to substantial pre-application engagement, to which it responds accordingly.
- 6.0.3 It is contended, therefore, that planning permission should be granted accordingly as there are no material considerations to suggest otherwise.



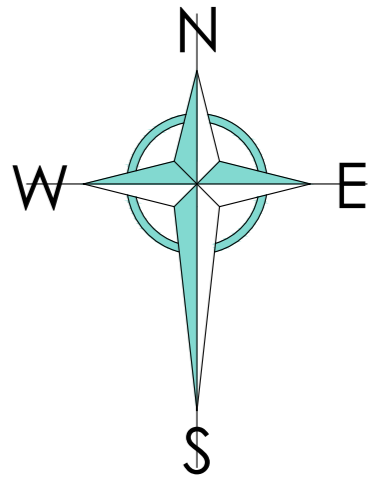


**APPENDIX 1**  
**Site Location Plan**

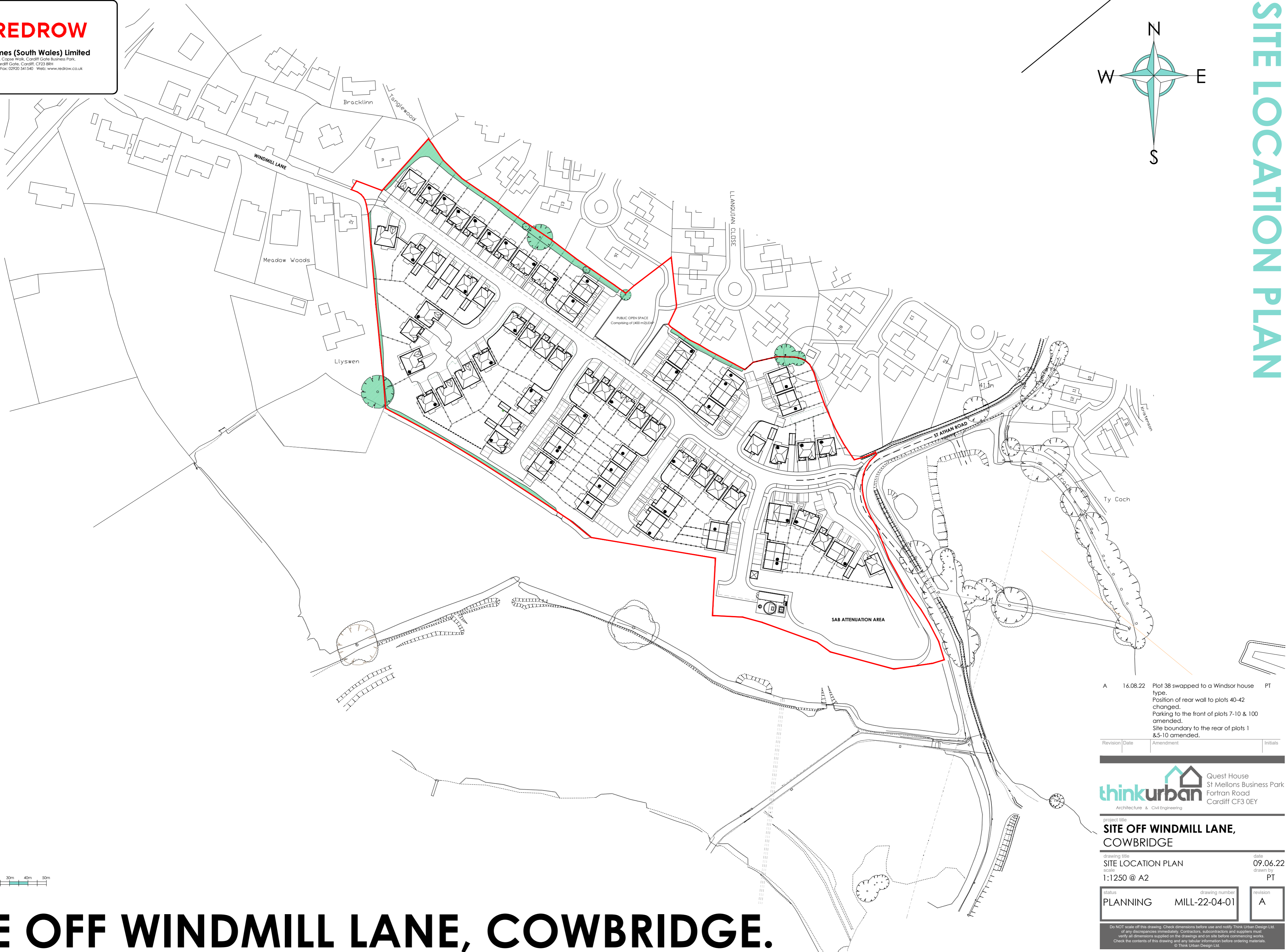




**Redrow Homes (South Wales) Limited**  
 Redrow House, Copsie Walk, Cardiff Gate Business Park,  
 Cardiff Gate, Cardiff, CF23 8RH  
 Tel: 02920 549103 Fax: 02920 541540 Web: www.redrow.co.uk



**SITE LOCATION PLAN**



A 16.08.22 Plot 38 swapped to a Windsor house type.  
 Position of rear wall to plots 40-42 changed.  
 Parking to the front of plots 7-10 & 100 amended.  
 Site boundary to the rear of plots 1 & 5-10 amended.

Revision	Date	Amendment	Initials

**thinkurban** Quest House  
 St Mellons Business Park  
 Fortran Road  
 Cardiff CF3 0EY  
 Architecture & Civil Engineering

**SITE OFF WINDMILL LANE, COWBRIDGE**

drawing title: **SITE LOCATION PLAN**  
 scale: 1:1250 @ A2  
 date: 09.06.22  
 drawn by: PT

status	drawing number	revision
PLANNING	MILL-22-04-01	A

Do NOT scale off this drawing. Check dimensions before use and notify Think Urban Design Ltd. of any discrepancies immediately. Contractors, subcontractors and suppliers must verify all dimensions supplied on the drawings and on site before commencing works. Check the contents of this drawing and any tabular information before ordering materials. © Think Urban Design Ltd.

**SITE OFF WINDMILL LANE, COWBRIDGE.**

**APPENDIX 2**

**Pre-Application Responses**



Date/Dyddiad: 27 October 2020

Ask for/Gofynwch am: Mr. Mark Stringer

Telephone/Rhif ffon: (01446) 704659

Your Ref/Eich Cyf:

My Ref/Cyf: P/DC/2020/00078/PRE

e-mail/e-bost: Planning@valeofglamorgan.gov.uk

The Vale of Glamorgan Council  
Dock Office, Barry Docks, Barry CF63 4RT  
Tel: (01446) 700111

Cyngor Bro Morgannwg  
Swyddfa'r Doc, Dociau'r Barri, Y Barri CF63 4RT  
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[www.valeofglamorgan.gov.uk](http://www.valeofglamorgan.gov.uk)



Emma Fortune  
2, Callaghan Square  
Cardiff  
CF10 5AZ

Dear Madam,

**Town and Country Planning Act, 1990 (as amended)**  
**Application No. 2020/00078/PRE**

**Proposal: Development of circa 100 residential units along with associated highway and drainage infrastructure**

**Location: Land off Windmill Lane, Cowbridge**

I refer to your correspondence received on 23 July 2020, concerning the above and your request for statutory pre-application advice. Having considered the nature of submission in detail, I respond as follows.

**Proposal**

The pre-application documents describe a development proposal for roughly 100 dwellings and associated highway and drainage infrastructure on land between Windmill Lane and St Athan Road, Cowbridge.

The pre-application documents indicate that:

- Affordable housing would be provided on the site;
- Walking and cycling links between the site and nearby streets would be created;
- The site's vehicular entrance would be created on St Athan Road;
- An existing public right of way would be 'upgraded'.

Below are extracts from the documents:

## CONSTRAINTS & OPPORTUNITIES

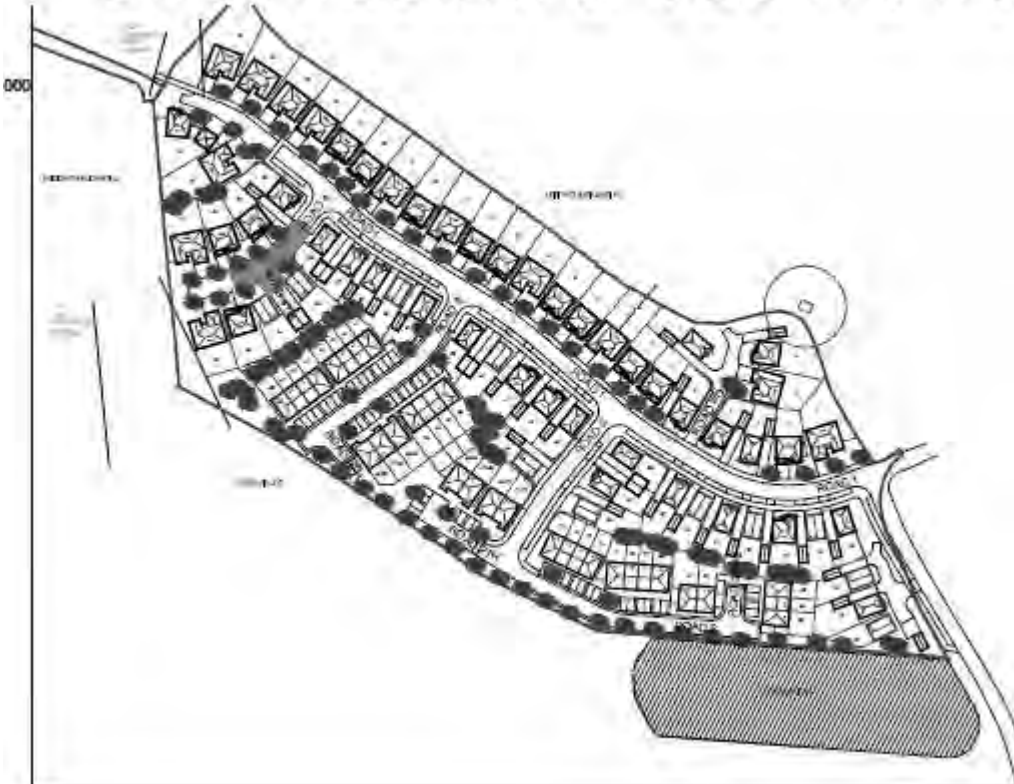


## SKETCH PLAN

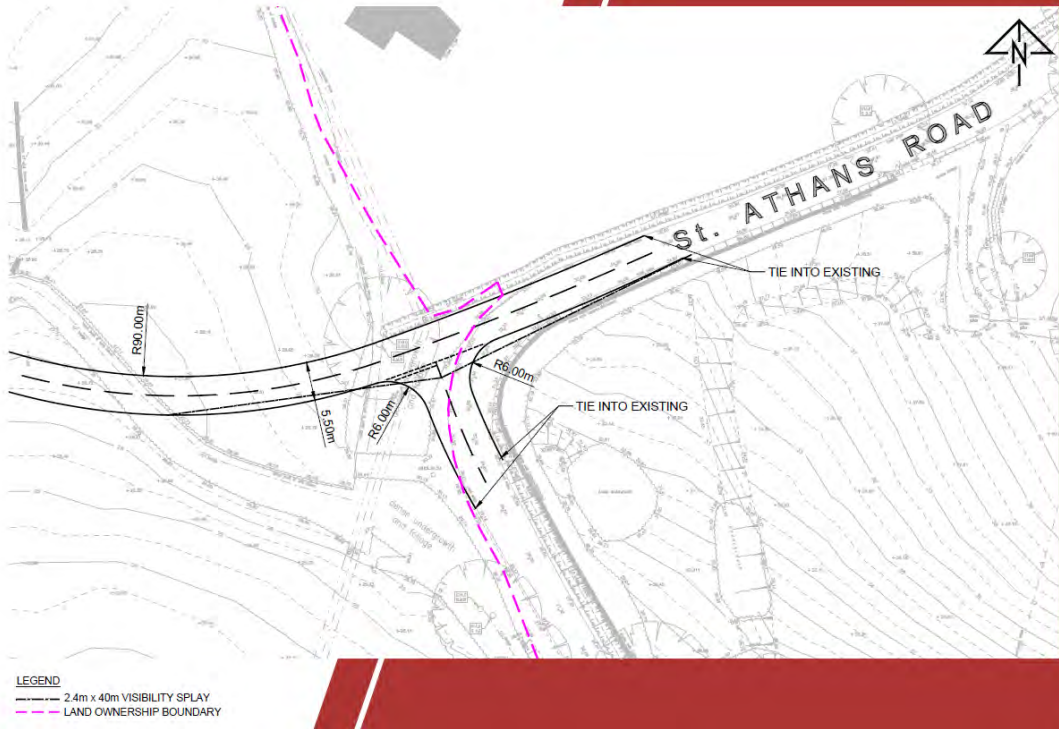





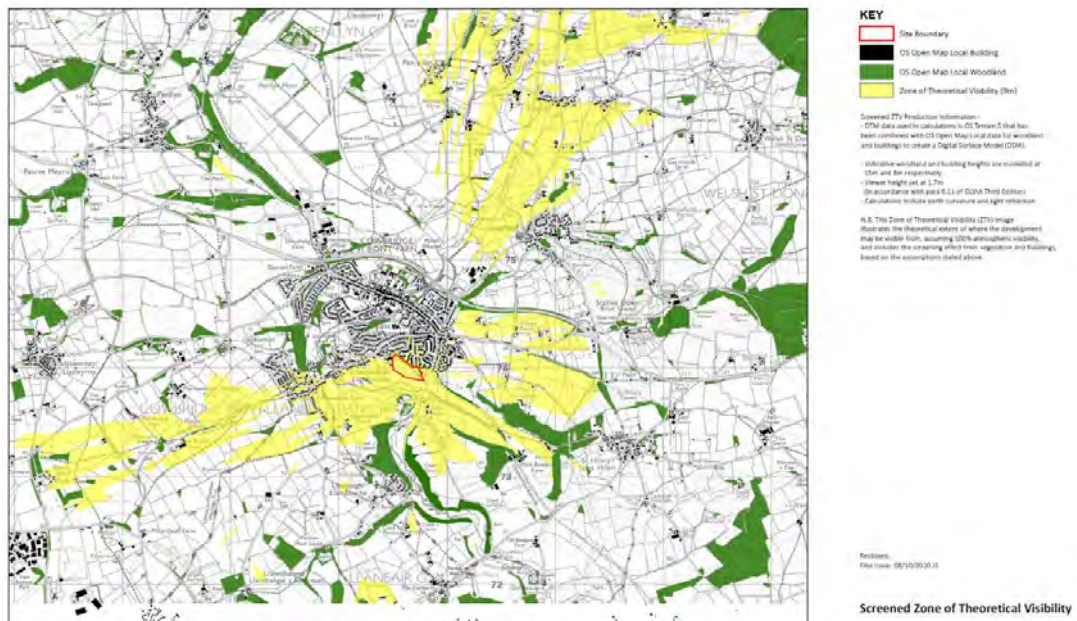
## ENGINEERING SECTIONS



# SITE ENTRANCE ENGINEERING



REV	DETAILS	DRAWN	CHECKED	DATE	Notes:	LAND ADJOINING ST ATHAN ROAD		REDROW			
					1. This is not a construction drawing and is intended for illustrative purposes only. 2. While likely to be indicative only.	<b>PROPOSED SITE ACCESS</b>		 <small>Ground Floor, Westgate House, Church Hill, Cardiff, CF10 3JF                      T: 030 2072 0861                      E: enquiries@vectos.co.uk</small>			
					<b>LEGEND</b> - - - - - 2.4m x 40m VISIBILITY SPLAY - - - - - LAND OWNERSHIP BOUNDARY - - - - - 3RD PARTY LAND OWNERSHIP BOUNDARY [Pink Shaded Area] ADOPTED HIGHWAY	<small>DRAWN:</small> LT	<small>CHECKED:</small> MT	<small>DATE:</small> 15.06.20	<small>SCALE:</small> 1:500 at A3	<small>DRAWING NUMBER:</small> 195148_A02	<small>REVISION:</small> *



## Local Context and Constraints

### SITE LOCATION PLAN



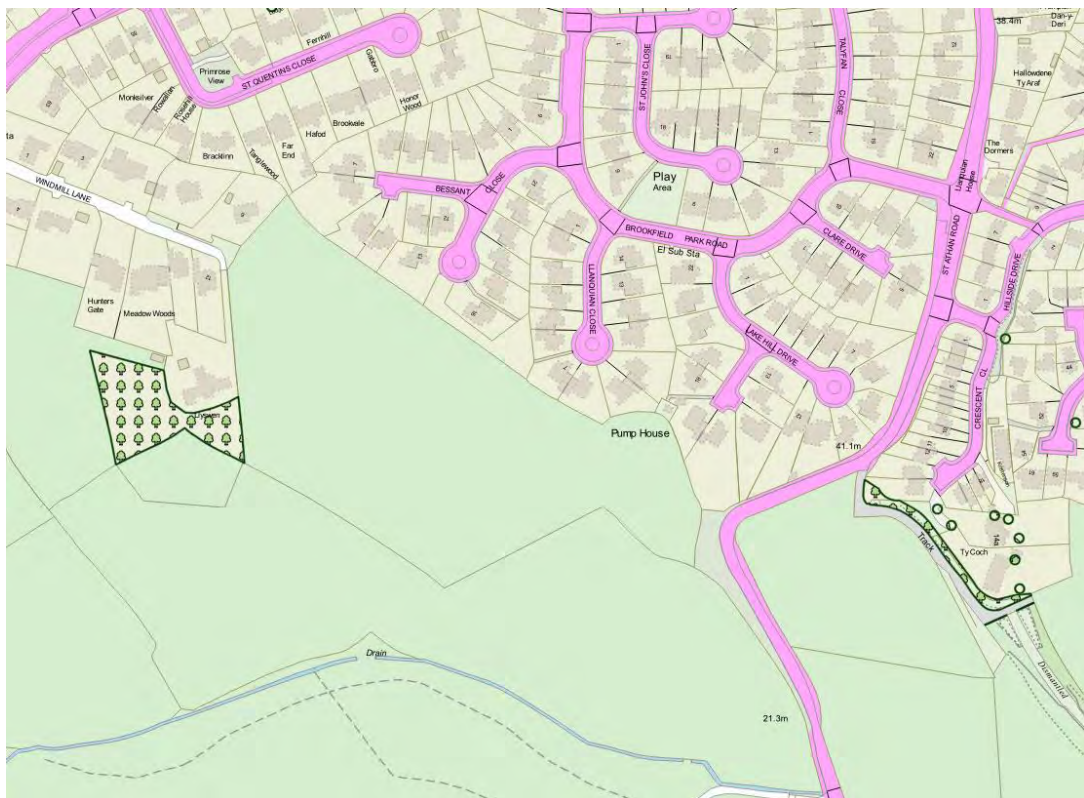
Roughly 3.8 hectares in area, the site consists of undeveloped land that descends quite steeply from west to east. It is next to houses, undeveloped land, a private road (Windmill Lane) and an adopted highway (St Athan Road). For policy purposes, the site is in the defined settlement of Cowbridge (a 'service centre settlement' in the LDP's settlement hierarchy), a housing allocation ('Land adjoining St Athan Road, Cowbridge') and Flood Zone A (little or no risk of flooding from rivers and the sea). It is next to, but not in, several mineral safeguarding areas and the Upper and Lower Thaw Valley Special Landscape Area (SLA). A public right of way (shown below) runs through the site, and a group of protected trees is next to the site's south-west corner. Planning records indicate that part of the site may be archaeologically sensitive and that the site does not consist of 'best and most versatile' (BMV) agricultural land.



The purple line on the map extract below represents the public right of way:



The green area represents the group of protected trees:



## Relevant Planning History

Our records indicate that the site has the following planning history:

1978/02402/OUT: Proposed to develop the site for housing on a density similar to Brookfield Park – decision: refused

1979/00649/OUT: Proposal to develop OS 6200 and 7188 for housing on a density similar to Brookfield Park and improve St. Athan Road by new road works affecting OS 8700, 8492 and 8782 – decision: refused

## Consultation responses

I have sent you, by email, copies of all consultation responses. Where I do not reproduce observations in full below, I shall merely summarise the main points made by a technical adviser.

### Rural Housing Enabler

*There is an evidenced need for additional affordable housing in the Vale of Glamorgan, as evidenced by the 2019 draft Local Housing Market Assessment (LHMA) which determined that 890 additional affordable housing units were required each year to meet housing need in the area.*

*The need is further evidenced by the following figures from the council's Homes4U waiting list in the area in the ward of Cowbridge:*

Cowbridge		
Social Rent		LCHO
1 Bed	145	4
2 Bed	75	72
3 bed	30	25
4 bed	6	3
5+ Bed	1	0
<b>Total</b>	<b>257</b>	<b>104</b>

[Note: LCHO stands for "low cost home ownership.]

*In line with the current Supplementary Planning Guidance for Affordable Housing, our Affordable Housing (AH) requirements would be as follows:*

*The application is for 'circa 100' residential units, of which in line with the SPG, we would expect 40% to be affordable. Please note, should the total number of units built be different to the 100 stated, the below requirements will change.*

*Of this 40% we would ask for 70% to be for rent with the remaining 30% to be for Low Cost Home Ownership (LCHO).*

*Based on 100 units we would require 40 units of affordable housing in total with 28 being for rent and 12 for low cost sale.*

*Reflecting the % need for H4U our requirements would be:*

*16no. 1 bed units to be provided as 4 blocks of 4 walk up flats  
8no. 2 bed units  
3no. 3 bed units*

1no. 4 bed unit

*The remaining 12 units for LCHO. As there are already circa. 40no. 2 bed LCHO units in Cowbridge currently in development, we would suggest that these be 3 bed units.*

*All AH properties need to be DQR compliant and we would expect the developer to work with a named RSL to deliver these properties.*

#### Highway authority

The highway authority made detailed observations about this proposal. The main points to consider are:

- A planning application should include:
  - a transport assessment;
  - a construction environment management plan;
  - a construction traffic management plan;
- The possibility that drivers might travel quickly along a long, straight internal road;
- The proposal should create a safe and accessible environment for all users;
- Walkers and cyclists should have priority over drivers and motorcyclists.

#### Principal Landscape Officer

The Principal Landscape Officer stated that, because the site is next to the Upper and Lower Thaw Valley Special Landscape Area (SLA), a planning application should include a landscape and visual impact assessment (LVIA).

#### Ecology Officer

The Countryside team made the following observations about this proposal:

*The site would need to have an ecological survey to establish use by breeding birds, mammals and reptiles. They would need to have a tree survey carried out on any tree being removed to establish if they are used by roosting Bats and if they are they will need to provide the appropriate license and mitigation. It looks like they are going to remove a large section of hedgerow, which seems to be an idea link to other fields for foraging bats, badgers etc. How are they going to mitigate for this.*

#### Public Rights of Way Officer (PRWO)

The PRWO stated:

*The applicant has noted that public right of way No.58 Llanblethian (status – Footpath) crosses the property and has suggested upgrading the footpath. From the documents provided it would appear that it will be necessary to divert the public footpath, I would suggest that the applicant contact the Rights of Way team at the earliest opportunity to discuss their proposal.*

*I have attached our guidance note to developers and emphasise that the applicant should avoid diverting the public footpath onto estate roads wherever possible, our preference is the use of estate paths through landscaped or open space areas away from vehicular traffic, also the granting of Planning Permission does not give permission to automatically close or divert a public right of way. Planning Permission does not mean that any application to alter the Public Rights of Way network will succeed.*

*The Public Right of Way must be kept open and available for safe use by the public at all times. Should the Public Right of Way require temporary closure to assist in facilitating works an order should be sought under the Road Traffic Regulation Act 1984. Temporary closure should not be sought in order to allow construction of permanent obstructions.*

*A legal diversion or stopping-up order must be obtained, confirmed and implemented prior to any development affecting the Public Right of Way taking place.*

### Planning policy

The planning-policy team made the following recommendation in its observations:

*The proposed residential development of allocated site MG2 (19) is welcomed. However, the draft proposal for the partial development of the allocation without providing the required realignment to St Athan Road or details of how suitable and safe access could be provided for the remaining land to the east is considered contrary to Policy MD5 (criterion 2) and the transportation policies of the Plan. A comprehensive scheme should be submitted as part of any future planning application along with any necessary supporting evidence as suggested above. As walking and cycling access from Windmill Lane is likely to prove problematic, alternative walking and cycling access through Bessant Close and Llanquian Close should be considered. The location of the open space and play area should also be justified.*

### Land Drainage

The Land Drainage team stated:

*This site is not located in DAM zones at risk of tidal or fluvial flooding and NRW maps indicate that there is a very low to low risk of surface water flooding to the site. It is stated within the pre-application request document that the proposed development will follow the surface water runoff destination priority levels set out in current Statutory Standards for Sustainable Drainage Systems. Where a Drainage Strategy Document is to be submitted it is requested that demonstration is provided how these standards have been met in the proposed design.*

*At this pre-application stage limited drainage information has been provided for review. From the concept layout included within the brochure, it appears limited scope has been made available for the use of sustainable drainage*

*and would request that further consideration is made to the provision of greater source control measures through the inclusion of SuDS within the proposed design.*

*The surface water drainage scheme should be designed so that flooding does not occur on any part of the site for a 1 in 30 year return period plus climate change (30%) and not in any part of any building for a 1 in 100 year return period plus climate change with consideration made to receiving flows from the wider catchment.*

### Glamorgan-Gwent Archaeological Trust (GGAT)

GGAT stated:

*We have consulted the regional Historic Environment Record (HER) and note that there is a significant archaeological site in the proposed development area. It is a bivallate hillslope enclosure, likely dating to the Iron Age. The feature is semi-circular in shape, truncated to the north by a hedgebank and composed of a bank and ditch, measuring approximately 10m across both, with a diameter of 28m. The HER also notes an area (roughly 90m in diameter) enclosed by fragmentary banks averaging 4m in width and 0.3m in height, possibly boundary banks.*

*As a result there is the potential for encountering archaeological remains, particularly those dating to the prehistoric period. Therefore, should a similar application to the one you have outlined be submitted, we would be likely to recommend an archaeological evaluation prior to any consent being granted. The evaluation would likely take the form of a geophysical survey, followed by trial trenching. It should also be noted that, depending on the results of the evaluation further archaeological work may be required prior to/post consent and/or areas preserved as open-space to protect archaeological remains. This is consistent with our response to the LDP (our ref. VOG1062).*

### **Relevant Planning Policies**

#### Local Development Plan:

Section 38 of The Planning and Compulsory Purchase Act 2004 requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises the Vale of Glamorgan Adopted Local Development Plan 2011-2026, which was formally adopted by the Council on 28 June 2017, and within which the following policies are of relevance:

#### *Strategic Policies*

POLICY SP1 – Delivering the Strategy  
POLICY SP3 – Residential Requirement  
POLICY SP4 – Affordable Housing Provision  
POLICY SP7 – Transportation  
POLICY SP10 – Built and Natural Environment

## *Managing Growth Policies*

POLICY MG1 – Housing Supply in the Vale of Glamorgan  
POLICY MG2 – Housing Allocations  
POLICY MG4 – Affordable Housing  
POLICY MG6 – Provision of Educational Facilities  
POLICY MG7 – Provision of Community Facilities  
POLICY MG8 – Provision of Health Facilities  
POLICY MG16 – Transport Proposals  
POLICY MG17 – Special Landscape Areas  
POLICY MG19 – Sites and Species Of European Importance  
POLICY MG20 – Nationally Protected Sites and Species  
POLICY MG21 – Sites of Importance for Nature Conservation, Regionally Important Geological and Geomorphological Sites and Priority Habitats and Species

## *Managing Development Policies:*

POLICY MD1 – Location of New Development  
POLICY MD2 – Design of New Development  
POLICY MD3 – Provision for Open Space  
POLICY MD4 – Community Infrastructure and Planning Obligations  
POLICY MD5 – Development within Settlement Boundaries  
POLICY MD6 – Housing Densities  
POLICY MD7 – Environmental Protection  
POLICY MD8 – Historic Environment  
POLICY MD9 – Promoting Biodiversity

In addition to the Adopted LDP the following policy, guidance and documentation supports the relevant LDP policies.

## Planning Policy Wales

National planning policy in the form of Planning Policy Wales (Edition 10, 2018) (PPW) is of relevance to the determination of this application.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

The following chapters and sections are of particular relevance in the assessment of this planning application:

### Chapter 2 – People and Places: Achieving Well-being Through Placemaking

- Maximising well-being and sustainable places through placemaking (key Planning Principles, national sustainable placemaking outcomes, Planning Policy Wales and placemaking)

### Chapter 3 – Strategic and Spatial Choices

- Good Design Making Better Places

- Promoting Healthier Places
- Accessibility
- Supporting Infrastructure

#### Chapter 4 – Active and Social Places

- Transport
- Living in a Place (housing, affordable housing and gypsies and travellers and rural enterprise dwellings )
- Community Facilities
- Recreational Spaces

#### Chapter 5 – Productive and Enterprising Places

- Energy (reduce energy demand and use of energy efficiency, renewable and low carbon energy, energy minerals)
- Making Best Use of Material Resources and Promoting the Circular Economy (design choices to prevent waste, sustainable Waste Management Facilities and Minerals)

#### Chapter 6 – Distinctive and Natural Places

- Recognising the Special Characteristics of Places (The Historic Environment, Green Infrastructure, Landscape, Biodiversity and Ecological Networks, Coastal Areas)
- Recognising the Environmental Qualities of Places (water and flood risk, air quality and soundscape, lighting, unlocking potential by taking a de-risking approach)

#### Technical Advice Notes

The Welsh Government has provided additional guidance in the form of Technical Advice Notes. The following are of relevance:

- Technical Advice Note 2 – Planning and Affordable Housing (2006)
- Technical Advice Note 5 – Nature Conservation and Planning (2009)
- Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010)
- Technical Advice Note 10 – Tree Preservation Orders (1997)
- Technical Advice Note 11 – Noise (1997)
- Technical Advice Note 12 – Design (2016)
- Technical Advice Note 15 – Development and Flood Risk (2004)
- Technical Advice Note 18 – Transport (2007)
- Technical Advice Note 21 – Waste (2014)
- Technical Advice Note 24 – The Historic Environment (2017)

#### Supplementary Planning Guidance

In addition to the adopted Local Development Plan, the Council has approved Supplementary Planning Guidance (SPG). The following SPG documents are relevant:

- Affordable Housing (2018)
- Biodiversity and Development (2018)
- Design in the Landscape
- Model Design Guide for Wales
- Parking Standards (2019)
- Planning Obligations (2018)
- Public Art in New Development (2018)
- Residential and Householder Development (2018)
- Sustainable Development – A Developer's Guide
- Travel Plan (2018)
- Trees, Woodlands, Hedgerows and Development (2018)

#### Other relevant evidence or policy guidance

- Manual for Streets (Welsh Assembly Government, DCLG and DfT - March 2007)
- Welsh Government Circular 016/2014: The Use of Planning Conditions for Development Management
- Welsh Office Circular 13/97 - Planning Obligations

#### Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council's duty and the "sustainable development principle", as set out in the 2015 Act. In reaching the recommendation set out below, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

### **Analysis of Proposal**

I shall discuss the development proposal under the following headings:

- Principle of development;
- Density and efficient use of land;
- Visual impact;
- Accessibility;
- Amenity space;
- Impact on neighbours;
- Highways;
- Drainage;
- Ecology;
- Trees;
- Archaeology;
- Pre-application consultation;
- Planning obligations;
- Supporting documents.

### **Principle of development**



LDP policy MD5 (Development within Settlement Boundaries) states that:

*Settlement boundaries have been defined around all the settlements within the LDP settlement hierarchy. New development within these settlements will be permitted where the proposed development:*

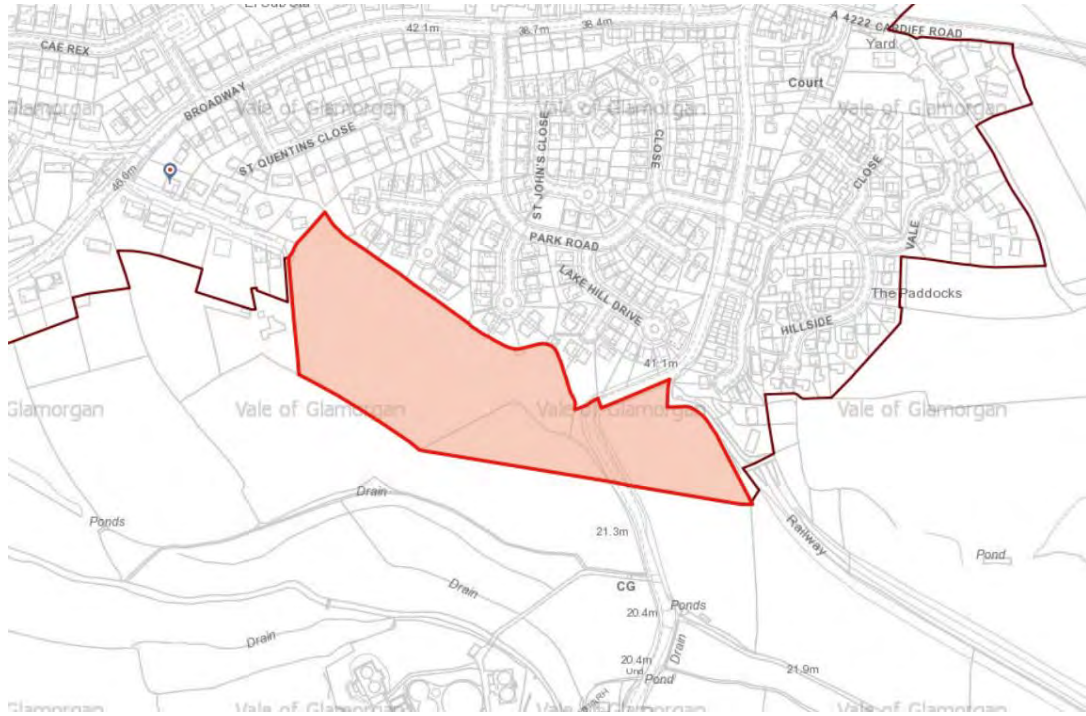
- 1. Makes efficient use of land or buildings;*
- 2. Would not prejudice the delivery of an allocated development site;*
- 3. Is of a scale, form, layout and character that is sympathetic to and respects its immediate setting and the wider surroundings and does not unacceptably impact upon the character and appearance of the locality;*
- 4. The proposal would not result in the loss of natural or built features that individually or cumulatively contribute to the character of the settlement or its setting;*
- 5. Would not result in the unacceptable loss of public open space, community or tourism buildings or facilities;*
- 6. Has no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking; and*
- 7. Makes appropriate provision for community infrastructure to meet the needs of future occupiers.*

Supporting text to LDP policy MD5 under paragraph 7.33 states that:

*Accordingly to protect the identity of [the Vale's defined] settlements, to ensure the efficient use of land and to protect the countryside from urbanisation and incremental loss, development will only be permitted outside of the identified settlement boundaries where it complies with national planning policy set out in paragraph 9.3.2 of PPW. Such developments would also need to respond appropriately to the local context and accord with Policies MD1 and MD2.*

(Note: Paragraph 7.33 refers to an earlier version of PPW, but the corresponding paragraph in the latest version of PPW is set out below.)

The pre-application site is part of a 4.3-hectare housing allocation – 'Land adjoining St. Athan Road, Cowbridge' (see LDP policy MG2(19) – in the LDP:



The LDP allocates the land for 130 dwellings. The corresponding appendix of the LDP states that:

*This 4.3 hectare Greenfield site lies to the south east of Llanblethian, and comprises two parcels of land adjacent to the St Athan Road. Outline planning permission for the whole of the site will be required in order to ensure a comprehensive approach to development and the provision of any necessary infrastructure. Affordable housing will be delivered in accordance with Policy MG4.*

The proposed land use is acceptable in principle because it accords with the LDP housing allocation. Even so, the allocation comprises two parcels of land, only one of which is owned by your client. The proposal must not frustrate plans or impact on the deliverability of the remainder of the allocation. Arrangements for access and drainage in particular have the potential to affect the other parcel of land. I shall discuss these issues in detail later. It is noted that you show a separate entrance that could be created to connect the other parcel of land and St Athan Road:



This kind of arrangement appears to be acceptable in principle.

Finally, the pre-application documents suggest that an attenuation basin might be created outside the housing allocation. This may be acceptable in principle, but formal application documents should explain why drainage systems cannot be confined to the allocation site.

### **Density and efficient use of land**

LDP policy MD6 (Housing Densities) states that:

*Residential development proposals within the key, service centre and primary settlements will be permitted where the net residential density is a minimum of 30 dwellings per hectare. In minor rural settlements, a minimum net residential density of 25 dwellings per hectare will be required.*

*Lower density levels will only be permitted where it can be demonstrated that:*

1. *Development at the prescribed densities would have an unacceptable impact on the character of the surrounding area;*
2. *Reduced densities are required as a result of significant site constraints or to preserve a feature that would contribute to existing or future local amenity; or*
3. *The proposal is for a mixed use development where a residential use is the subordinate element of the proposal.*

*Higher densities will be permitted where they reflect the character of the surrounding areas and would not unacceptably impact upon local amenity.*

As Cowbridge is a 'service centre settlement', the proposal should create a

residential density of at least 30 dwellings per hectare. Yet, if 100 dwellings were built, the proposal would create a residential density of only 26 dwellings per hectare. Also, the whole 4.3-hectare housing allocation (MG2(19)) is supposed to provide 130 dwellings. The 3.8-hectare pre-application site accounts for 88% of the allocated area, but a 100-dwelling proposal would provide only 77% of the allocated dwellings. Unless you intend to meet the entire allocation's requirement for public open space on the pre-application site, the apparent shortfall in dwelling numbers might put unreasonable pressure on another developer to build 30 dwellings on only half a hectare of land (at a residential density of 60 dwellings per hectare). I suggest that you consider this issue before submitting a planning application. The planning authority must ensure that allocated sites yield the agreed numbers of dwellings.

## **Visual impact**

LDP policy MD5 (Development within Settlement Boundaries) states that:

*Settlement boundaries have been defined around all the settlements within the LDP settlement hierarchy. New development within these settlements will be permitted where the proposed development:*

- *Is of a scale, form, layout and character that is sympathetic to and respects its immediate setting and the wider surroundings and does not unacceptably impact upon the character and appearance of the locality;*
- *The proposal would not result in the loss of natural or built features that individually or cumulatively contribute to the character of the settlement or its setting.*

The pre-application site descends quite steeply from west to east, and I realise that sloping land can present a developer with certain challenges. Even so, a development project on a 'greenfield' housing allocation should meet high standards of architecture and urban design.

The pre-application documents do not show how the dwellings might look, so I cannot comment on whether the proposed architecture might suit the site and its surroundings. Neither do I see any need to recommend a particular style of architecture for the site. More important than style will be the *quality* of the design. However materials and finishes are important and should reflect that used within the locality.

The documents suggest that an internal road would connect Windmill Lane and St Athan Road by following the route of the public right of way. The internal road would be a kind of 'trunk' from which several 'branches' would extend. This kind of layout – a long linear road with dead-end side streets would not be in line with the guidance set out within Manual for Streets. It can also lead to other kinds of problems, which I shall discuss in 'Highways' and 'Accessibility', below. The estate to the north has several dead ends, but it is not an example that should be followed based on current guidance and best practice. I realise that the long internal road might permit largely unbroken views of the countryside to the east, but a different layout, not

dominated by a single road, might create a more intimate and attractive environment.

It looks as though many plots in the north of the site would have driveways between the houses and the internal road. I am concerned that this would create a streetscape dominated by cars, and recommend that you consider a more imaginative approach to parking.

Public open space (POS) presents another challenge. A site plan would need to include 55.68 square metres of POS for every dwelling (it might even need to provide the POS for the entire allocation – see ‘Density and efficient use of land’, above) and I am not sure whether this could be achieved with the current layout.

As discussed at our meeting, an area of POS must be provided within the site. You should fully explore an area of POS adjacent to the existing area of open space to the rear of Llanquian Close/Bessant Close and the scheme could potentially incorporate that area of open space to make a much more meaningful area. Moreover, important linkages can then be provided into Brookfield Park Road and beyond via the short sections of footpath between the play area and these two closes, which would provide much greater permeability through the site and more direct linkages into the existing settlement.

Whilst the location of the affordable housing units has not been identified on the plan, we would not support affordable units being located in large single groups set back from the main road separate to the market housing dwellings. Given that 40% of the dwellings on site will be affordable, they must be fully integrated within the development.

The slope of the site seems likely to necessitate the use of retaining walls or similar structures. Any such walls should be carefully designed and located so that they do not dominate the site or make it look ‘over-engineered’ and should be detailed at planning application stage.

The site is next to, but not in, an SLA. The Principal Landscape Architect has said that a planning application should include an LVIA.

In summary, the proposed layout seems unlikely to create the kind of high-quality built environment sought on an allocated site.

## **Accessibility**

LDP policy MD2 (Design of New Development) states that:

*In order to create high quality, healthy, sustainable and locally distinct places development proposals should:*

- *Provide a safe and accessible environment for all users, giving priority to pedestrians, cyclists and public transport users (criterion five).*

A layout consisting of a spine road and several dead ends is unlikely to create a convenient and enjoyable environment for walkers and cyclists. Instead, journeys made on foot or by bicycle are likely to be indirect. Such an environment is also said to be disorientating for people with dementia or similar conditions. I strongly recommend that you consider a more permeable layout. A grid-based design, for example, would almost certainly create a busier, safer and more sociable estate.

Because the site has quite a steep slope, I recommend that a planning application include a walkability assessment (the term 'walking' covering the use of wheelchairs and other mobility aids). This should demonstrate that the built environment would be safe and accessible for all users, including children, elderly people, wheelchair users and people with dementia, among others.

Future residents should be able to walk and cycle along Windmill Lane and through the Brookfield Park Road estate to the north. Creating the necessary connections would not only help to integrate the new housing into the settlement but also provide residents with safe and convenient routes to the town centre.

### **Amenity space**

Paragraph 10.1 of the Residential & Householder Development SPG states:

*For the purposes of this Guidance, amenity space associated with residential properties includes front gardens and private rear gardens. It does not include footpaths, driveways and parking areas. Amenity space is essential and provides a number of important functions that contribute towards a resident's enjoyment of a property. Those essential functions include space for relaxation, entertainment and play; gardening and cultivation; clothes washing and drying; DIY; and waste, cycle and other domestic storage.*

Design Standard 4 of the SPG states:

*For houses, a minimum of 20 sq.m amenity space per person\* should be provided, and the majority should be private garden space.*

*\*typically a 2 bed house would have 3 persons, 3+ bedrooms would typically have 4 persons.*

The first two 'key principles' of paragraph 10.3 are:

- Proposals for new houses or conversions to create new dwellings and new householder development must ensure that an adequate provision of amenity space is provided and maintained;
- Private (usually rear) gardens should be of a useable shape, form and topography.

The proposed dwellings should meet the SPG's targets for the amount of space. But they should also have *good-quality* amenity space that is comfortable, private, light and usable in every way. In particular given the

sloping site, you should ensure that all amenity space is usable avoiding any steep gradients. I recommend that a supporting statement specify the amount of amenity space provided for each dwelling.

### **Impact on neighbours**

LDP policy MD2 (Design of New Development) states that development proposals should 'safeguard existing public and residential amenity, particularly with regard to privacy, overlooking, security, noise and disturbance'.

LDP policy MD7 (Environmental Protection) states that:

*Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:*

- 1. Pollution of land, surface water, ground water and the air;*
- 2. Land contamination;*
- 3. Hazardous substances;*
- 4. Noise, vibration, odour nuisance and light pollution;*
- 5. Flood risk and consequences;*
- 6. Coastal erosion or land stability;*
- 7. The loss of the best and most versatile agricultural land; or*
- 8. Any other identified risk to public health and safety.*

*Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed or legal obligation entered into, to secure any necessary mitigation and monitoring processes.*

The Residential and Householder Development SPG sets out advice on development proposals and their effect on residential amenity, judged in terms of artificial light, natural light, noise, outlook, privacy, among other things. I recommend that you read section nine in particular.

The pre-application documents do not allow me to measure distances between proposed buildings and neighbours' houses and gardens. (At any rate, I have already suggested that the layout be changed to create a more permeable and attractive estate.) I recommend that you read section nine of the Residential & Householder Development SPG before you submit a planning application. It describes the various ways in which a development proposal might harm the residential amenity of neighbours. But, given the size of the site, I believe that a proposal could have an acceptable effect on local residential amenity.

### **Highways**

The Parking Standards SPG places the site in Zone B: Urban. It recommends that houses and flats in Zone B have one off-street parking

space for each bedroom, up to a maximum of three spaces, and that housing sites have one visitor space for every five dwellings.

Paragraph 5.1 of the SPG states that:

*In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as **maximum** rather than minimum standards i.e. they are 'not more than' figures [original emphasis].*

I shall not reproduce the highway authority's detailed observations here. The main points to consider are:

- A planning application should include:
  - a transport assessment;
  - a construction environment management plan;
  - a construction traffic management plan;
- The possibility that drivers might travel quickly along a long, straight internal road;
- The proposal should create a safe and accessible environment for all users;
- Walkers and cyclists should have priority over drivers and motorcyclists.

You suggested in our meeting that you might change the layout, and I have already described the kinds of changes that I should like to see. Whatever layout you settle on, I suggest that you discuss your proposal again with the highway authority before submitting a planning application.

## **Drainage**

With the exception of single dwellings and/or developments with a "construction area" of less than 100 square metres, all construction work requiring planning permission which has drainage implications will need Sustainable Drainage Approving Body (SAB) approval.

SuDS are intended to maximise the opportunities and benefits that can be provided by the effective management of surface water. This can only be achieved when the principles of SuDS are considered at the outset of the development process. The SuDS approach to surface water management will direct the development process and shape the layout of new developments around site drainage.

A Sustainable Drainage Approving Body (SAB) application must demonstrate compliance with the statutory standards, following a set of principles in the design of the system and satisfy the standards in relation to runoff destination, hydraulic control, water quality, amenity, biodiversity, construction, operation and maintenance.

The SAB approval process is separate from the planning application process. An application for approval for a surface water drainage scheme may be made to the SAB separately from, or combined with a planning application. The planning and SAB approvals are independent systems and there may be circumstances where separate applications are appropriate.



Prior to the submission of a planning application, if the development would trigger a SAB application, applicants are strongly advised to make a separate Pre-Application submission to the SAB. Please note that pre-application fees may apply. Further advice can be found at <http://www.valeofglamorgan.gov.uk/en/living/Flooding/Flood-and-Coastal-Erosion/Sustainable-Drainage-Systems.aspx>

The council's Land Drainage team made the following observations about the proposal:

*This site is not located in DAM zones at risk of tidal or fluvial flooding and NRW maps indicate that there is a very low to low risk of surface water flooding to the site.*

*It is stated within the pre-application request document that the proposed development will follow the surface water runoff destination priority levels set out in current Statutory Standards for Sustainable Drainage Systems. Where a Drainage Strategy Document is to be submitted it is requested that demonstration is provided how these standards have been met in the proposed design.*

*At this pre-application stage limited drainage information has been provided for review. From the concept layout included within the brochure, it appears limited scope has been made available for the use of sustainable drainage and would request that further consideration is made to the provision of greater source control measures through the inclusion of SuDS within the proposed design.*

*The surface water drainage scheme should be designed so that flooding does not occur on any part of the site for a 1 in 30 year return period plus climate change (30%) and not in any part of any building for a 1 in 100 year return period plus climate change with consideration made to receiving flows from the wider catchment.*

In our recent meeting, the manager of the Land Drainage team expressed some concern over the proposed drainage arrangements. I recommend that your drainage consultants continue to discuss the proposal with Land Drainage until you submit a planning application and an application for 'SAB' approval.

## **Ecology**

LDP policy MD9 (Promoting Biodiversity) states that:

*New development proposals will be required to conserve and where appropriate enhance biodiversity interests unless it can be demonstrated that:*

- 1. The need for the development clearly outweighs the biodiversity value of the site; and*

- 2. The impacts of the development can be satisfactorily mitigated and acceptably managed through appropriate future management regimes.*

The Countryside team made the following observations about this proposal:

*The site would need to have an ecological survey to establish use by breeding birds, mammals and reptiles. They would need to have a tree survey carried out on any tree being removed to establish if they are used by roosting Bats and if they are they will need to provide the appropriate license and mitigation. It looks like they are going to remove a large section of hedgerow, which seems to be an idea link to other fields for foraging bats, badgers etc. How are they going to mitigate for this.*

No part of the application site is designated as a site of European or national ecological importance, but a planning application should include a preliminary ecology assessment of biodiversity on and near the site. Particular attention should be paid to any trees or sections of hedgerow that would be trimmed or removed. The proposal should also set out ways of enhancing biodiversity on the site, in accordance with LDP policy MD9.

### **Trees and hedgerows**

Section 197 (a) of the Town and Country Planning Act 1990 states that:

*It shall be the duty of the local planning authority [...] to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees.*

The Trees, Woodlands, Hedgerows and Development SPG sets out advice on protecting and replacing trees. Paragraph 7.1.2 states that:

*Details of any trees that are on or adjacent to the site for which a planning application is being submitted must also be included with the planning application form. Applications where trees are affected by development proposals should generally be supported by a Tree Survey, Tree Constraints Plan and an Arboricultural Implications Assessment (AIA) as defined in BS5837 (2012), in some cases bat surveys may also be required. Further guidance on this is provided below.*

Paragraph 7.3.3 states that:

*Trees which are protected by a TPO or classified within retention category A or B in a BS5837: 2012 survey should be retained on the site. If it is proposed to remove any A or B category trees, then the Council will require the applicant to demonstrate how the removal is necessary and outline any mitigation measures to be provided. Each site will be considered on its individual merits, giving consideration to the surrounding landscape and existing tree canopy cover.*

Paragraph 9.1.2 of the SPG states that:

*When removal of a TPO tree is considered acceptable (through a planning application or TPO application), the Council will normally require replanting at a **ratio of 2:1** which is necessary to mitigate the amenity loss of a mature or high value trees [original emphasis]. In cases not involving a TPO tree the Council will encourage a similar 2:1 replanting ratio wherever possible. This approach is in accordance with the general principles and aspirations of Strategic Policy SP10 (Built and Natural Environment) and other policies of the LDP and the Council's Draft Tree Strategy (See section 4.3).*

Paragraph 9.1.3 of the SPG states that:

*However each scheme or proposal will be considered on a case by case basis and there may be instances where no replanting will be required or where replanting above the 2:1 ratio is necessary in order to ensure the continuation of the local amenity afforded by trees. Where tree loss is accepted, replacement planting will need to take into account the number, sizes and species of the trees lost and should contribute to the extension of tree and woodland cover across the development site.*

A planning application must include a survey of any trees and hedgerows affected by the proposal. I recommend that you read the Trees, Woodlands, Hedgerows and Development SPG. Sections 7, 8, 9 and 12 are especially relevant to this proposal.

## **Archaeology**

Glamorgan-Gwent Archaeological Trust (GGAT) made the following observations about the proposal:

*We have consulted the regional Historic Environment Record (HER) and note that there is a significant archaeological site in the proposed development area. It is a bivallate hillslope enclosure, likely dating to the Iron Age. The feature is semi-circular in shape, truncated to the north by a hedgebank and composed of a bank and ditch, measuring approximately 10m across both, with a diameter of 28m. The HER also notes an area (roughly 90m in diameter) enclosed by fragmentary banks averaging 4m in width and 0.3m in height, possibly boundary banks.*

*As a result there is the potential for encountering archaeological remains, particularly those dating to the prehistoric period. Therefore, should a similar application to the one you have outlined be submitted, we would be likely to recommend an archaeological evaluation prior to any consent being granted. The evaluation would likely take the form of a geophysical survey, followed by trial trenching. It should also be noted that, depending on the results of the evaluation further archaeological work may be required prior to/post consent and/or areas preserved as open-space to protect archaeological remains. This is consistent with our response to the LDP (our ref. VOG1062).*

In summary, a 'significant archaeological site' is on the proposed development area, and so a planning application should include an archaeological evaluation consisting of a geophysical survey and trial trenching. Additional archaeological work may be required too.

## Pre-Application Consultation

For all applications for 'major' development, there is a statutory requirement for the applicant / developer to consult the community and relevant statutory consultees, and to submit a Pre-Application Consultation (PAC) Report with any application.

Detailed advice can be found here:

<http://gov.wales/docs/desh/publications/160129annex-1-pre-application-consultation-en.pdf>

## Planning obligations

The Council's Planning Obligations Supplementary Planning Guidance (SPG) provides the local policy basis for seeking planning obligations through Section 106 Agreements in the Vale of Glamorgan. It sets thresholds for when obligations will be sought, and indicates how they may be calculated.

The Council's SPG is available to view/ download at:

<http://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Policy/SPG/Planning-Obligations-SPG-2018.pdf>

The following table, taken from pages seven and eight of the SPG, sets out the thresholds beyond which the planning authority seeks certain planning obligations:

Type of Obligation	Residential development threshold	Commercial Development Threshold	Formula
*Affordable Housing in Barry	Net gain of 5 dwellings	-	30% on site
*Affordable Housing in Llanwit Major, Rhoose and St Athan	Net gain of 5 dwellings	-	35% on site
*Affordable Housing in the rest of the Vale of Glamorgan	Net gain of 1 dwelling**	-	40% on site unless otherwise agreed
Sustainable Transport	10	1000sqm floor space / 1ha site	£2300/dwelling or £2300/100sqm floor space
Education	10	-	<b>Contributions per dwelling</b> (depending on available capacity in local schools) Nursery = £1,825 Primary = £5,073 Secondary = £5,720 Post 16 = £1,193 Total = £13,811
Training and Development	-	1000sqm floor space / 1ha site	one trainee (£1255) per 500sqm of new floor space
Community Facilities	25	-	0.75sqm of community floor space per dwelling = a financial contribution of £1,260 per dwelling

Public Open Space	5	1000sqm floor space / 1ha site	2.4 ha per 1000 population = 55.68m <sup>2</sup> per dwelling or £1,150 per person = £2,668 per dwelling
Public Art	10	1000sqm floor space / 1ha site	1% of Build Costs
Biodiversity	Assessment on a case by case basis	Assessment on a case by case basis	No specific formula.

Following consideration of the proposed development and potential impacts and needs arising from the development, I would advise that the Council is likely to seek planning obligations covering the following:

- Affordable Housing – 40% of the proposed units;
- Education – £13,811 for every dwelling;
- Public Open Space – 55.68 square metres for every dwelling, a contribution of £2,668 for every dwelling, or a mix of the two (the planning authority would prefer to see all public open space provided on the site);
- Sustainable Transport – £2,300 for every dwelling;
- Community Facilities – £1,260 for every dwelling;
- Public Art – 1% of building costs.

Since the pre-application query concerns *approximately* 100 dwellings, I have not set out precise figures, but you should be able to calculate the total contribution once you have an exact number of dwellings in mind.

In addition, and separate to any obligation sought, the Council requires the developer to pay an administration fee, equivalent to 20% of the application fee or 2% of the total financial contribution being sought, whichever is the greater. This fee covers the Council's costs to negotiate, monitor and implement the terms of the necessary Section 106 agreement.

Further discussion on such matters can, of course, be entered into at the time of an application, or as part of any agreed further pre-application submissions.

### **Required Supporting Documentation**

In addition to the submission of standard mandatory supporting documentation such as application forms, plans and a Design and Access Statement (see TAN 12 Design, Appendix 1), please be advised that any application for the above development should also be accompanied by the following additional documentation:

- Archaeological evaluation consisting of a geophysical survey and trial trenching;
- Design-and-access statement;
- Drainage strategy and plans (foul water and surface water);
- Landscape and visual impact assessment (LVIA);
- PAC Report ("Major" applications);
- Preliminary ecological assessment (and any other surveys deemed necessary by its author);

- Survey of any trees and hedges affected by the proposal;
- Walkability assessment.

I strongly recommend that a planning application include full details of existing ground levels, retaining structures, proposed ground levels, proposed roof levels and corresponding streetscape images.

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be able to be progressed until its satisfactory submission.

#### Requests for Further Advice

In accordance with the Council's Guidance Note on 'charging for pre-application advice', any further requests for pre-application advice will attract payment of a further fee, and should be made in writing with appropriate supporting documentation.

#### Development Team Approach – Building Control

Please note if you decide to employ the Council's Building Control team in respect of the proposed development for which you have sought advice, any fees you have paid in respect of this guidance will be taken into account in assessing the relevant Building Regulations fee. All Building Regulations fees are now based on a standard hourly rate with the final fee payable worked out on a risk assessed basis. Accordingly as the Council's officers will have been involved in the project from the earliest stages this will be considered in the final risk assessment based fee for Building Regulations.

Should you have any further questions regarding the above, please contact Mr. Mark Stringer on the above number.

Yours faithfully,



p.p. Mr. Mark Stringer  
**for Operational Manager Development Management**

#### **Please Note:**

The advice offered in this response represents an informal opinion, provided in accordance with the Council's Guidance Note on 'charging for pre-application advice'. In particular, it is emphasised that while this pre-application advice will be carefully considered in reaching a decision or recommendation on an application, the final decision on any application that you may make can only be taken after we have consulted local people, statutory consultees and any other interested parties. It does not, therefore prejudice any decision which the Local Planning Authority may make should the matter come before them in a formal context.

Date/Dyddiad: 18 November 2021

Ask for/Gofynwch am: Mr. Shafqut Zahoor

Telephone/Rhif ffon: (01446) 704608

Your Ref/Eich Cyf:

My Ref/Cyf: P/DC/2020/00078/PRE

e-mail/e-bost: Planning@valeofglamorgan.gov.uk

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Emma Fortune  
2, Callaghan Square  
Cardiff  
CF10 5AZ

Dear Madam,

**Town and Country Planning Act, 1990 (as amended)**  
**Application No. 2020/00078/PRE**  
**Proposal: Development of 84 residential units along with associated highway and drainage infrastructure**  
**Location: Land off Windmill Lane, and St Athan Road, Cowbridge**

I refer to your correspondence received on 15 October 2021, concerning the above and your request for statutory pre-application advice. Having considered the nature of submission in detail, I respond as follows.

### Proposal

The submission requests pre-application advice for the construction of:

- 84 dwellings with a mixture of market and affordable units;
- An new upgraded access from St Athan Road;
- Public open space and links to an existing open space provision along Llanquian Close;
- Associated drainage infrastructure;
- Upgrading of the public right of way to Windmill Lane.

An extract of the proposed site layout can be viewed below:

## Site off Windmill Lane, Cowbridge.



### Local Context and Constraints

The application site measures approximately 3.8 hectares of agricultural land located to the south of Cowbridge. The application site is located partly within the defined settlement boundary of Cowbridge (a 'service centre settlement' in the LDP's settlement hierarchy). The site is also within a housing allocation ('Land adjoining St Athan Road, Cowbridge').

The site topography varies with levels descending quite steeply from west to east. The site is bound by residential dwellings to the north and west and agricultural land to the south and east. The land to the east also forms part of the allocation that the application site is within.

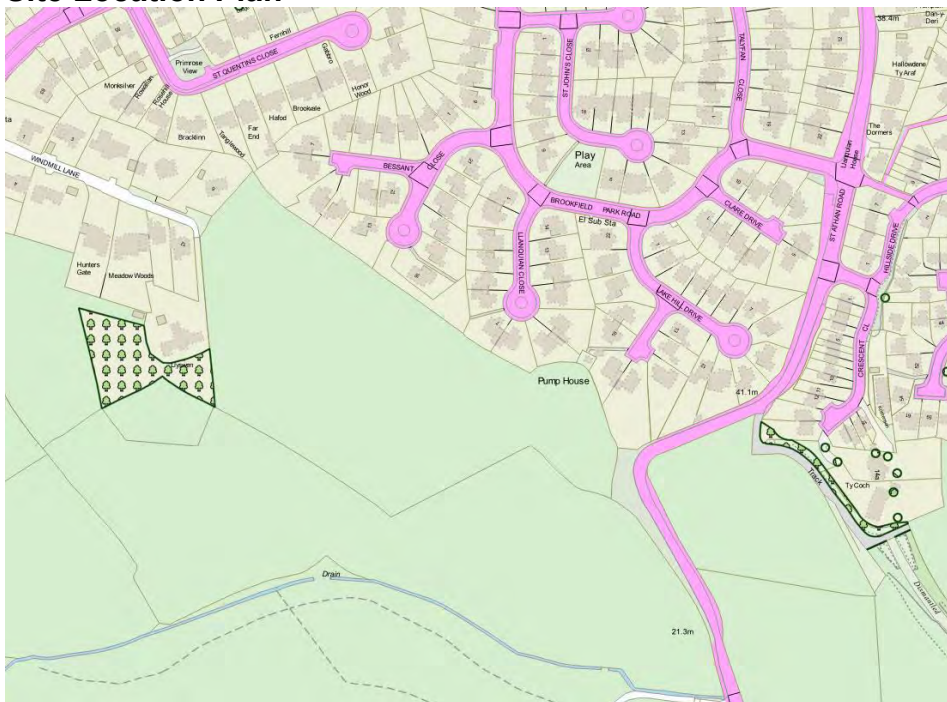
The application site adjoins but is not within mineral safeguarding areas and the Upper and Lower Thaw Valley Special Landscape Area (SLA). A public right of way runs through the site from west to east, and a group of protected trees is next to the site's south-west corner. Council records identify the land as having potential archaeological interest.

Extracts of the site location plan, PROW plan and a plan showing TPO trees in the area can be viewed below:

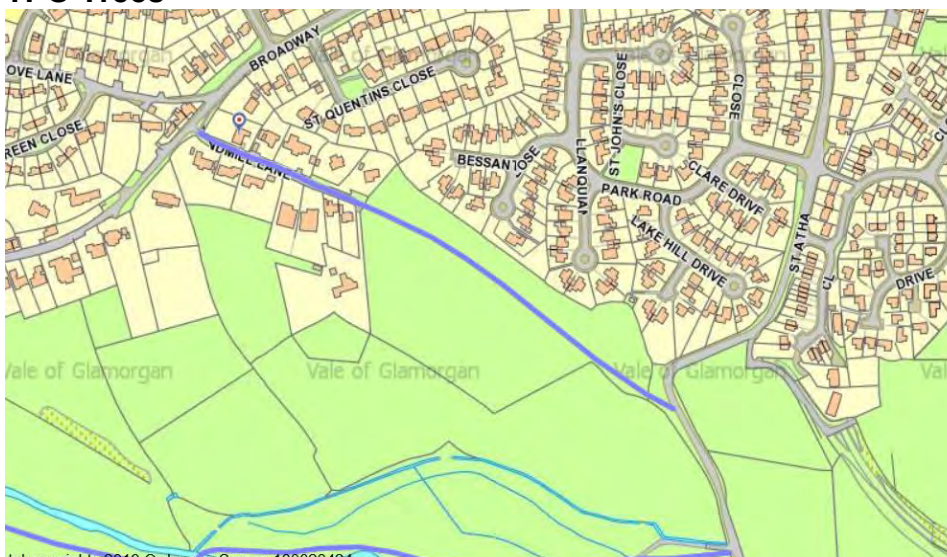




**Site Location Plan**



**TPO Trees**



**Public Right of Way**

## Relevant Planning History

From an examination of our records, the application site/ property has the following relevant planning history:

1978/02402/OUT: Proposed to develop the site for housing on a density similar to Brookfield Park – decision: Refused

1979/00649/OUT: Proposal to develop OS 6200 and 7188 for housing on a density similar to Brookfield Park and improve St. Athan Road by new road works affecting OS 8700, 8492 and 8782 – decision: Refused

## **Relevant Planning Policies**

### Local Development Plan:

Section 38 of The Planning and Compulsory Purchase Act 2004 requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises the Vale of Glamorgan Adopted Local Development Plan 2011-2026, which was formally adopted by the Council on 28 June 2017, and within which the following policies are of relevance:

### Strategic Policies

POLICY SP1 – Delivering the Strategy  
POLICY SP3 – Residential Requirement  
POLICY SP4 – Affordable Housing Provision  
POLICY SP7 – Transportation  
POLICY SP10 – Built and Natural Environment

### Managing Growth Policies

POLICY MG1 – Housing Supply in the Vale of Glamorgan  
POLICY MG2 – Housing Allocations  
POLICY MG4 – Affordable Housing  
POLICY MG6 – Provision of Educational Facilities  
POLICY MG7 – Provision of Community Facilities  
POLICY MG8 – Provision of Health Facilities  
POLICY MG16 – Transport Proposals  
POLICY MG17 – Special Landscape Areas  
POLICY MG19 – Sites and Species of European Importance  
POLICY MG20 – Nationally Protected Sites and Species  
POLICY MG21 – Sites of Importance for Nature Conservation, Regionally Important Geological and Geomorphological Sites and Priority Habitats and Species

### Managing Development Policies:

POLICY MD1 – Location of New Development  
POLICY MD2 – Design of New Development  
POLICY MD3 – Provision for Open Space

POLICY MD4 – Community Infrastructure and Planning Obligations  
POLICY MD5 – Development within Settlement Boundaries  
POLICY MD6 – Housing Densities  
POLICY MD7 – Environmental Protection  
POLICY MD8 – Historic Environment  
POLICY MD9 – Promoting Biodiversity

In addition to the Adopted LDP the following policy, guidance and documentation supports the relevant LDP policies.

### Planning Policy Wales

National planning policy in the form of Planning Policy Wales (Edition 11, 2021) (PPW) is of relevance to the determination of this application.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

### Technical Advice Notes

The Welsh Government has provided additional guidance in the form of Technical Advice Notes. The following are of relevance:

- Technical Advice Note 2 – Planning and Affordable Housing (2006)
- Technical Advice Note 5 – Nature Conservation and Planning (2009)
- Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010)
- Technical Advice Note 10 – Tree Preservation Orders (1997)
- Technical Advice Note 11 – Noise (1997)
- Technical Advice Note 12 – Design (2016)
- Technical Advice Note 15 – Development and Flood Risk (2004)
- Technical Advice Note 18 – Transport (2007)
- Technical Advice Note 21 – Waste (2014)
- Technical Advice Note 24 – The Historic Environment (2017)

### Supplementary Planning Guidance

In addition to the adopted Local Development Plan, the Council has approved Supplementary Planning Guidance (SPG). The following SPG documents are relevant:

- Affordable Housing (2018)
- Biodiversity and Development (2018)
- Design in the Landscape
- Model Design Guide for Wales
- Parking Standards (2019)
- Planning Obligations (2018)
- Public Art in New Development (2018)
- Residential and Householder Development (2018)
- Sustainable Development – A Developer's Guide

- Travel Plan (2018)
- Trees, Woodlands, Hedgerows and Development (2018)

#### Other relevant evidence or policy guidance

- Manual for Streets (Welsh Assembly Government, DCLG and DfT - March 2007)
- Welsh Government Circular 016/2014: The Use of Planning Conditions for Development Management
- Welsh Office Circular 13/97 - Planning Obligations

#### Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council's duty and the "sustainable development principle", as set out in the 2015 Act. In reaching the recommendation set out below, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

#### **Analysis of Proposal**

The principal issues to consider in this application relate to the:

- Principle of development;
- Density;
- Design/Layout/Visual impact;
- Accessibility;
- Amenity space;
- Impact on neighbours;
- Parking Provision & Highway/pedestrian safety;
- Drainage;
- Biodiversity;
- Trees;
- Archaeology;
- Pre-application consultation;
- Planning obligations;

This pre application builds upon the previous pre application advice issued on October 2020.

## Principle of development

LDP policy MD5 (Development within Settlement Boundaries) states that:

*Settlement boundaries have been defined around all the settlements within the LDP settlement hierarchy. New development within these settlements will be permitted where the proposed development:*

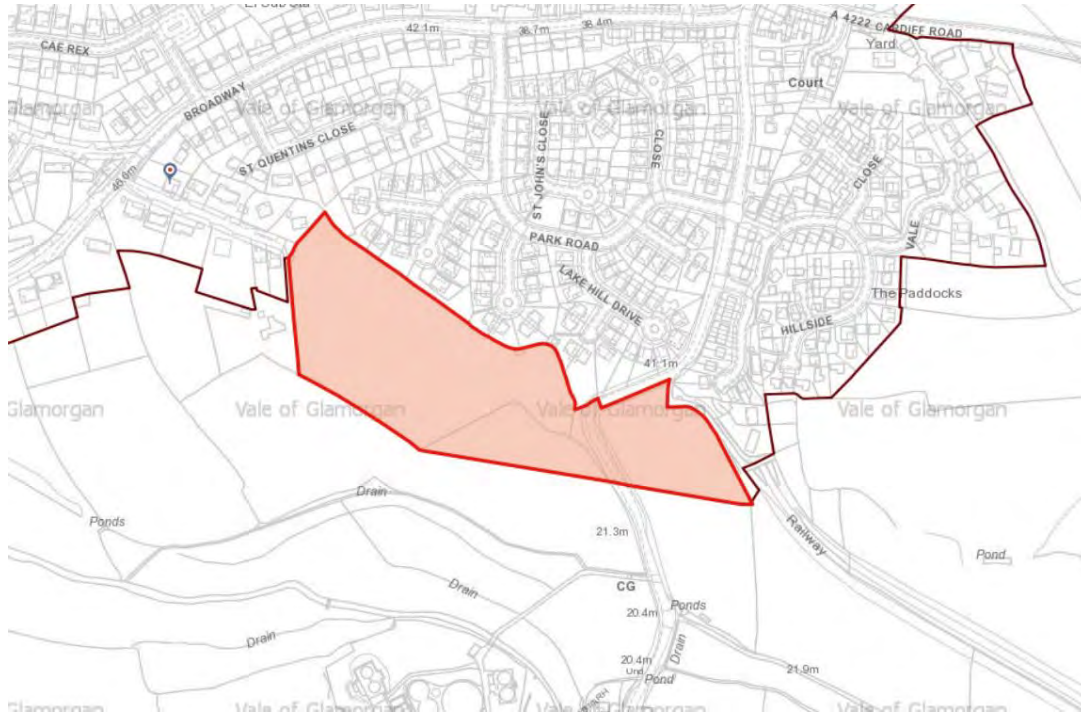
- 1. Makes efficient use of land or buildings;*
- 2. Would not prejudice the delivery of an allocated development site;*
- 3. Is of a scale, form, layout and character that is sympathetic to and respects its immediate setting and the wider surroundings and does not unacceptably impact upon the character and appearance of the locality;*
- 4. The proposal would not result in the loss of natural or built features that individually or cumulatively contribute to the character of the settlement or its setting;*
- 5. Would not result in the unacceptable loss of public open space, community or tourism buildings or facilities;*
- 6. Has no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking; and*
- 7. Makes appropriate provision for community infrastructure to meet the needs of future occupiers.*

Supporting text to LDP policy MD5 under paragraph 7.33 states that:

*Accordingly to protect the identity of [the Vale's defined] settlements, to ensure the efficient use of land and to protect the countryside from urbanisation and incremental loss, development will only be permitted outside of the identified settlement boundaries where it complies with national planning policy set out in paragraph 9.3.2 of PPW. Such developments would also need to respond appropriately to the local context and accord with Policies MD1 and MD2.*

(Note: Paragraph 7.33 refers to an earlier version of PPW, but the corresponding paragraph in the latest version of PPW is set out below.)

The pre-application site is part of a larger 4.3-hectare housing allocation – 'Land adjoining St. Athan Road, Cowbridge' (see LDP policy MG2(19) – in the LDP:



The LDP allocates the land for 130 dwellings. The corresponding appendix of the LDP states that:

*This 4.3 hectare Greenfield site lies to the south east of Llanblethian, and comprises two parcels of land adjacent to the St Athan Road. Outline planning permission for the whole of the site will be required in order to ensure a comprehensive approach to development and the provision of any necessary infrastructure. Affordable housing will be delivered in accordance with Policy MG4.*

The proposed land use is acceptable given that the site is within a housing allocation within the LDP. Nevertheless, the allocation comprises two parcels of land, only one of which is owned by your client. This matter has been highlighted previously, however I must stress that the LPA would like both sites to be developed as one development. Should this not be possible, the proposal at your client's site must not frustrate plans or impact on the deliverability of the remainder of the allocation.

In addition, I note that the pumping station and detention basin are located outside the allocation boundary. No reason or justification has been provided for this incursion into the countryside. Any formal application will need to justify the extension, although at this stage there are concerns that the dph (as set out below) is contrary to policy and additional land outside the allocation and settlement has been included in the proposal which may be appropriate depending in its wider impacts.

### Density

LDP Policy MD6 (Housing Densities) indicates that residential development proposals within the service centre settlements will be permitted where the net residential density is a minimum of 30 dwellings per hectare. As the pre application proposes 84 dwelling on a site area of 3.82 (ha), the density on

site would be well below the 30 dwellings per hectare (dph) required within service centre settlements.

I note that your plans indicate that the developable area measures 2.75 ha which would satisfy the 30 dph. However, this relies on the affordable units circa 59 dph to bring the overall dph to circa 30. The market housing proposed has a dph level of 15 which is considered wholly unacceptable. As discussed at our meeting there is a marked contrast between the density of the affordable and market housing.

Whilst the policy MD6 does allow for a reduction where there are site constraints, it is clear from the affordable units layout that the site can accommodate more dwellings, if designed better regardless of the level difference.

In addition, I note that the whole allocation of 4.3-hectare housing allocation (MG2(19)) is required to provide 130 dwellings. The 3.8-hectare pre-application site accounts for 88% of the allocated area which should allow for 114 dwellings. An 84-dwelling proposal would result in a significant shortfall of the overall 130 of the allocated dwellings and still fall short of the 114 that should be accommodated on this parcel. As discussed there should be a better mix of house size with the provision of some smaller or linked groups of market house to increase the density on site, the variety of which can be used to provide a better mix through the site and provide an opportunity for better placemaking and reduce the stark contrast between the market and affordable units.

In addition, it would appear that you do not intend to meet the entire allocation's requirement for public open space on this site, therefore there could be unreasonable pressure on the remaining part of the allocation to accommodate 46 dwellings on only half a hectare of land (at a residential density of 92 dwellings per hectare).

Therefore at this stage of the submission, the LPA have significant concerns in relation to the piecemeal format of delivering the allocation and the overall density. I urge you to give this matter consideration prior to formally submitting an application.

#### Design/Layout/Visual impact

LDP policy MD5 (Development within Settlement Boundaries) states that:

*Settlement boundaries have been defined around all the settlements within the LDP settlement hierarchy. New development within these settlements will be permitted where the proposed development:*

- *Is of a scale, form, layout and character that is sympathetic to and respects its immediate setting and the wider surroundings and does not unacceptably impact upon the character and appearance of the locality;*
- *The proposal would not result in the loss of natural or built features that individually or cumulatively contribute to the character of the settlement or its setting.*

The pre-application site descends quite steeply from west to east, and I note from the meeting that this presents challenges when designing the site, particularly in terms of highway geometry and gradients. However, as discussed during the meeting, the LPA have significant concerns in relation to the character and layout of the proposal. The design appears to follow a very traditional suburban layout where the site has a spine road with small private drives accessed off the main road.

We feel that the submitted layout lacks imagination, again partly due to the dominance of detached market housing with little variety in terms of designs and property styles. The layout presents large detached hipped roof dwellings for the market housing and terraced blocks for affordable units. The layout would be contrary to the advice within PPW, plays little regard to placemaking or guidance set out within Manual for Streets.

Furthermore, all the affordable units are grouped together on secondary no through roads and appear cramped within the overall layout. Given that 40% of the dwellings on site will be affordable, they must be fully integrated within the development and would not be supported in the current layout.

No details have been provided in respect of materials and finishes. However, I note that render is a prominent feature on dwellings in the locality and therefore I advise that materials and finishes are important and should reflect that used within the locality and high quality. Where units are located on the corners, they should be designed as corner turning units to create more active facades on the secondary side elevations.

As discussed, the affordable units have been designed with banks of parking to the front. It is clear from your site layout that this design principal is not afforded to the market houses and therefore I urge you consider the layout, design and siting of the affordable units and its parking with more imagination as we discussed at the meeting.

In terms of Public Open Space, the Councils SPG requires 18.56 square metres of POS for every dwelling on this site, relating to equipped and non-equipped childrens play. This is on the basis that there is currently an overprovision of outdoors sport. Notwithstanding the comments relating to density above, based on 84 units the site should provide 1559 sqm of POS on site. The proposed layout has included a POS area of 600 sqm which is considered wholly inadequate. During the meeting there were some discussions about tweaking house types and increasing the space by a number of metres, clearly this would not provide the level required. Whilst I am pleased to see a linkage between the POS on the adjoining site, the level and type of provision shown would not be adequate to serve a development of this size.

You may recall that discussion also included making the POS a focal point within the site. Based on the current layout, the POS still appears shoehorned into this area of the site. There would a missed opportunity if the site was not designed with POS forming a feature within the overall site layout. As discussed, the central area of POS should be open out (widened to create much more of a meaningful area. We feel that the housing around



the POS could take a different form, perhaps small linked group or semi detached properties, to create more a distinct area and village green feel in the centre of the site point a sense of place within the middle of the site, again possible with to highway layout, (geometry surfacing) around the POS again the break up the dominance of the road. Whilst you may state that a large area of POS would mean less dwellings within the site, this can obviously be overcome by utilising small house types

The slope of the site seems likely to necessitate the use of retaining walls or similar structures. Any such walls should be carefully designed and located so that they do not dominate the site or make it look 'over-engineered' and should be detailed at planning application stage.

The site is adjacent to, but not within an SLA. The Principal Landscape Architect has previously advised that any formal planning application should be supported with a LVIA. The proposal includes a rain garden and pumping station which fall with the SLA. No details have been provided as to how the boundary of the site would be formed. No benching details have been provided for the rain garden and the layout includes a access track along the edge of the rain garden. Given how exposed the site is and any potential level changes, this aspect of the proposal does raise some initial concerns in respect to visual amenity impacts.

In summary, despite some design evolution from the previous pre application scheme, the proposed layout still fails to create the kind of high-quality built environment sought on an allocated site within the Vale of Glamorgan. I would urge you to be more imaginative and take comments on board.

### Accessibility

LDP policy MD2 (Design of New Development) states that:

*In order to create high quality, healthy, sustainable and locally distinct places development proposals should:*

- *Provide a safe and accessible environment for all users, giving priority to pedestrians, cyclists and public transport users (criterion five).*

A layout consisting of a spine road and several dead ends is unlikely to create a convenient and enjoyable environment for walkers and cyclists. Instead, journeys made on foot or by bicycle are likely to be indirect. Such an environment is also said to be disorientating for people with dementia or similar conditions. I strongly recommend that you consider a more permeable layout. A grid-based design, for example, would almost certainly create a busier, safer and more sociable estate.

There should be pedestrian connectivity connecting the end of the cul-de sacs, where houses at the end of the cul-de-sacs could be re orientated to front onto the footways. This would create a much more permeable form of development, as shown in yellow below.



We welcome the pedestrian connectivity through the area of POS into the adjacent area of POS in the existing residential development. To improve the visual connectivity into the adjacent area of POS development, it is likely that the section of hedgerow between the two area of POS would likely have to be removed or thinned out.

Future residents should be able to walk and cycle along Windmill Lane and through the Brookfield Park Road estate to the north. Creating the necessary connections would not only help to integrate the new housing into the settlement but also provide residents with safe and convenient routes to the town centre.

### Amenity space

Paragraph 10.1 of the Residential & Householder Development SPG states:

*For the purposes of this Guidance, amenity space associated with residential properties includes front gardens and private rear gardens. It does not include footpaths, driveways and parking areas. Amenity space is essential and provides a number of important functions that contribute towards a resident's enjoyment of a property. Those essential functions include space for relaxation, entertainment and play; gardening and cultivation; clothes washing and drying; DIY; and waste, cycle and other domestic storage.*

Design Standard 4 of the SPG states:

*For houses, a minimum of 20 sq.m amenity space per person\* should be provided, and the majority should be private garden space.*

*\*typically a 2 bed house would have 3 persons, 3+ bedrooms would typically have 4 persons.*

The first two 'key principles' of paragraph 10.3 are:

- Proposals for new houses or conversions to create new dwellings and new householder development must ensure that an adequate provision of amenity space is provided and maintained;
- Private (usually rear) gardens should be of a useable shape, form and topography.

In terms of amenity space, every affordable units falls short of the level of amenity space required by the SPG. This aspect of any proposed layout will need further consideration

A number of properties have large extended drives with garage set into the plot. This reduces the level of useable amenity space serving each property and depending on the scale of the garages provides a dominating structure within the rear garden. This aspect of the layout will also need further consideration.

The proposed dwellings should meet the SPG's targets for the amount of space. But they should also have *good-quality* amenity space that is comfortable, private, light and usable in every way. In particular given the sloping site, you should ensure that all amenity space is usable avoiding any steep gradients. I recommend that a supporting statement specify the amount of amenity space provided for each dwelling.

I note from the cross sections provided that there are level differences of over 5 metres between some plots. This significant difference and the need for retaining wall structures could be considered overbearing on the residential properties at a lower level, as there would be garden fencing bringing the overall height to over 7 metres. This is form of relationship between dwellings is considered unacceptable and must be fully considered and detailed in any planning application.

### Impact on neighbours

LDP policy MD2 (Design of New Development) states that development proposals should 'safeguard existing public and residential amenity, particularly with regard to privacy, overlooking, security, noise and disturbance'.

LDP policy MD7 (Environmental Protection) states that:

*Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:*

1. *Pollution of land, surface water, ground water and the air;*
2. *Land contamination;*
3. *Hazardous substances;*
4. *Noise, vibration, odour nuisance and light pollution;*
5. *Flood risk and consequences;*
6. *Coastal erosion or land stability;*

7. *The loss of the best and most versatile agricultural land; or*
8. *Any other identified risk to public health and safety.*

*Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed or legal obligation entered into, to secure any necessary mitigation and monitoring processes.*

The Residential and Householder Development SPG sets out advice on development proposals and their effect on residential amenity, judged in terms of artificial light, natural light, noise, outlook, privacy, among other things. I recommend that you read section nine in particular.

Without the benefit of house types it is difficult to see whether the proposed layout would adversely impact the amenity of any of the residential dwelling adjoining the site. Notwithstanding this, given the concerns in respect of layout and design, any amended layout should pay particular regards to the dwellings along the norther boundary of the site and those along Windmill Lane in respect of amenity and privacy.

#### Parking Provision & Highway/pedestrian safety

Criterion 5 of Policy MD2 of the LDP requires that the development meets the Council's standards to provide a safe and accessible environment for all users, giving priority to pedestrians, cyclists and public transport users on amenity and space, access, car parking and servicing.

Policy 6 states that proposals should have no unacceptable impact on highway safety nor cause or exacerbate existing traffic congestion to an unacceptable degree.

The Parking Standards SPG places the site in Zone B: Urban. It recommends that houses and flats in Zone B have one off-street parking space for each bedroom, up to a maximum of three spaces, and that housing sites have one visitor space for every five dwellings. You should note that driveway of excessive length to the front of garages which can accommodate more than three spaces are unlikely to be considered acceptable, given that these set back garages can reduce usable amenity space and also reduce the quality of amenity space.

Paragraph 5.1 of the SPG states that:

*In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as **maximum** rather than minimum standards i.e. they are 'not more than' figures [original emphasis].*

Any formal planning application should be supported with a transport assessment, a construction environment management plan and an construction traffic management plan.

The Councils Highway Authority have considered the revised proposals and have the following comments:

The revised access road shown on the drawings has been realigned to allow for straits to be max 60-70m before a change in direction in line with Manual for Streets, to achieve vehicle speeds of 20mph. As such the 3 No. narrowing's shown can be removed from the design which will negate the need for additional street signage and reduce clutter. However in terms of townscape and placemaking, these type of diversions and set outs can be used to provide interest in the street scene.

To further reduce speeds to the west of the site the access road can change to a shared surface from approximately plots 19/41 which will remain a shared surface for the remaining carriageways. As discussed it makes sense to link the shared surface to the reconfigured POS area, which can be used to visually break up the length of the spine road.

The change to a shared surface could start by plot 54 to incorporate the public open space.

Development layout to be designed to be compliant with Manual for Streets:

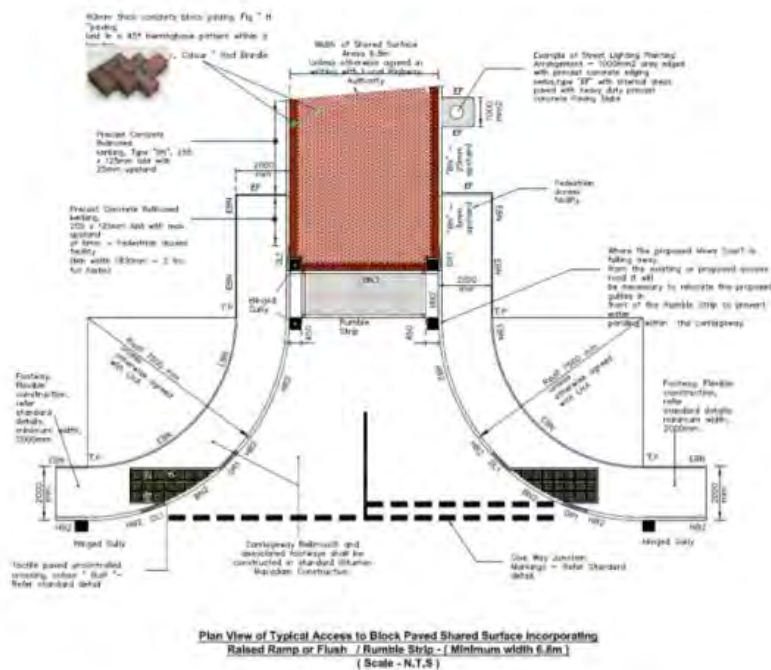
- Roads designed for 20mph where straits to be max 60-70m before a change in direction.
- Shared surfaces to be designed for 10 – 15mph to be short cul-de-sacs.
- Road widths to be 5.5m with 2m footways each side, shared surfaces to be 6.8m wide in block construction.

Forward visibility splays and junction visibility splays to be in line with Table A below:

<b>VISIBILITY REQUIREMENTS – HIGHWAY SAFETY</b>
Please ensure that all vision splays and forward visibility envelopes are within highway land and not across 3 <sup>rd</sup> party land.
<b>Primary Routes – 30mph.</b> Carriageway Tarmacadam, width 5.5m with 2m footways either side Junction – “Y” distance = 43m, “x” distance = 3m Forward visibility along road/bends = 43m
<b>Primary Routes – 20mph.</b> Carriageway Tarmacadam, width 5.5m with 2m footways either side Junction – “Y” distance = 25m, “x” distance = 3m Forward visibility along road/bends = 25m
<b>Secondary Routes – 20mph.</b> Carriageway Tarmacadam, width 5.5m with 2m footways either side Junction – “Y” distance = 25m, “x” distance = 2.4m Forward visibility along road/bends = 25m
<b>Shared Surfaces – 15mph.</b> Carriageway Tarmacadam, width 6.8m with localised widening for visitor parking Junction – “Y” distance = 25m, “x” distance = 2.4m Forward visibility along road/bends = 17m
<b>Private Drives – 15mph/10mph</b> “Y” distance = 25m Forward visibility along road/bends = Max 17m, Min 11m

**Table A.**

The shared surfaces being 6.8m wide to have an access layout as shown in diagram 1. Below.



**Diagram 1.**

A formal cycle/pedestrian link is required from Windmill Lane, though the site to link up with the public open space access to the existing residential development and through to St Athan Road. To accommodate this the private drive shown at plots 25-30 should be an adopted highway and form part of the shared surface and have a turning head at the end close to Windmill Lane.

Development layout to be designed to allow 11.22m long 3 axle refuse vehicle; to provide swept path analysis in and out of the development and manoeuvring through the site. Junction radius to be in line with the swept paths to be 10m at entrance and 6m within the development.

With regards to the parking space allocation, the requirement in accordance with the VoG Parking Standards SPG is for 1 vehicle parking space per bedroom (up to a maximum of 3) to be able to park within the curtilage of the property. Each car parking space is required to be provided at 2.6m x 4.8m. When parking is provided within a garage, the internal dimensions will be provided at 6.0m x 3.0m for a single garage and at 6.0m x 6.0m for a double garage.

The Parking Standards allow for a flexible approach where evidence can be supplied that the likely parking demand will be lower than usual. In which case we can look at a reduction in the parking allocation where there is evidence the likely parking demand of the proposed development would be reduced due to the nature of the development and if the site is located within walking distance of all local amenities, including good public transport facilities.

Provision of EV charging points for all types of dwellings and off-street parking within the development is also encouraged.

Drawing 19419\_SK509 Rev 4 Highway Long sections, from chainage 0m – 100m the gradient is shown to be 1:10 which exceeds the Max. gradient allowed within the Highway Authority. It is appreciated that there are constraints with the topology of the site, however the designer shall look at reducing the gradient to 1:12 in line with standards for highway design.

Drawing 19419\_SK509 Rev 4 Highway Long sections, from chainage 180m – 220m the vertical sag curve is below recommended K value of 6 shown to be 2.55. The designer to look at amending the vertical alignment to increase the K value to 6 or above.

### Drainage

With effect from 7 January 2019 and with the exception of single dwellings and/or developments with a “construction area” of less than 100 square metres, all construction work requiring planning permission which has drainage implications will need Sustainable Drainage Approving Body (SAB) approval.

SuDS are intended to maximise the opportunities and benefits that can be provided by the effective management of surface water. This can only be achieved when the principles of SuDS are considered at the outset of the development process. The SuDS approach to surface water management will direct the development process and shape the layout of new developments around site drainage.

A Sustainable Drainage Approving Body (SAB) application must demonstrate compliance with the statutory standards, following a set of principles in the design of the system and satisfy the standards in relation to runoff destination, hydraulic control, water quality, amenity, biodiversity, construction, operation and maintenance.

The SAB approval process is separate from the planning application process. An application for approval for a surface water drainage scheme may be made to the SAB separately from, or combined with a planning application. The planning and SAB approvals are independent systems and there may be circumstances where separate applications are appropriate.

*This site is not located in DAM zones at risk of tidal or fluvial flooding and NRW maps indicate that there is a very low to low risk of surface water flooding to the site. However, it is noted that the adjoining site falls within a C2 Floodzone.*

My colleagues in the Drainage Team have advised me that a SAB pre-application submission has been submitted and they have responded advising that they have no objection in principle subject to compliance and subject to you providing acceptable level of details requested.

## Biodiversity

Policy MD9 of the LDP is most relevant in respect of ecology matters, and it states 'New development proposals will be required to conserve and where appropriate enhance biodiversity interests.

The Council's Biodiversity and Development SPG (2018) requires new development to provide ecological enhancements to promote biodiversity within the Vale of Glamorgan.

Criterion 10 of Policy MD2 requires development to incorporate sensitive landscaping, including the retention and enhancement where appropriate of existing landscaping features and biodiversity interests.

I note that the proposal includes the loss of trees, hedgerows and grassland. These biodiversity features are likely to be habitat for reptiles and animals. Given this, and the likely loss of such habitat and features, any formal application will require a preliminary ecology assessment.

As aforementioned, a number of protected trees are located close to the site boundary. Therefore, any formal application should be supported with a tree impact assessment and any proposed dwellings located close to the tree should be sited sufficient distance so that they do not cause amenity issues for any future occupants.

Any formal application should also be supported with a biodiversity enhancement scheme identifying timescale of implementation and detailed design.

## Archaeology

Policy MD8 'Historic Environment' requires that development proposals must protect the qualities of the built and historic environment including criterion 4 that relates to the preservation or enhancement of archaeological remains and where appropriate their setting.

Glamorgan Gwent Archaeological trust have reviewed the submitted reports and confirm that further archaeological investigations/mitigation work will be required.

## **Pre-Application Consultation**

For all applications for 'major' development, there is a statutory requirement for the applicant / developer to consult the community and relevant statutory consultees, and to submit a Pre-Application Consultation (PAC) Report with any application.

Detailed advice can be found here:

<http://gov.wales/docs/desh/publications/160129annex-1-pre-application-consultation-en.pdf>



## Planning obligations

The Council's Planning Obligations Supplementary Planning Guidance (SPG) provides the local policy basis for seeking planning obligations through Section 106 Agreements in the Vale of Glamorgan. It sets thresholds for when obligations will be sought, and indicates how they may be calculated.

The Council's SPG is available to view/ download at:

<http://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Policy/SPG/Planning-Obligations-SPG-2018.pdf>

Following consideration of the proposed development and potential impacts and needs arising from the development, I would advise that the Council is likely to seek planning obligations covering the following:

**Affordable Housing** – 40% of the proposed units; I note that the submitted layout only proposes 33 units, in this instance 34 would be required in line with the SPG. The Councils will seek 70% to be for rent with the remaining 30% to be for Low Cost Home Ownership (LCHO).

The application proposes a mix as follows:

12 no. 1 bed apartments  
14 no. 2 bed houses  
6 no. 3 bed houses  
1 no. 4 bed house

We agree with the proposed mix and would ask for 1 additional 4 bed unit.

All AH properties need to be WDQR (2021) compliant. We would expect the developer to work with a named RSL to deliver these properties.

As stated above, consideration must be given to better distributing the location of the AH units through the estate, rather than limiting them to the secondary roads.

**Education** – Based upon the proposed 84 units available for S106 purposes, this would generate the following pupil requirements:

- 8 Nursery pupils
- 23 Primary pupils
- 20 Secondary pupils - 17 pupils (aged 11-16) and 3 pupils (post 16)

A breakdown of the impact of the pupil requirements on the planning obligations for the proposed development is shown below:

## **Nursery and primary**

The percentage split for primary schooling below is based on data for Cowbridge contained within the education facilities paper of 64.5% attending EM, 16% attending denominational and 19.5% attending Welsh medium.

### **Nursery:**

- Development serves Y Bontfaen Primary for English Medium schooling (64.5%), St David's for Denominational (16%), Ysgol Iolo Morgannwg for Welsh Medium (19.5%).
- No Capacity at a nursery level. The Council would therefore seek S106 contributions for 8 nursery age children at a cost of £18,249 per pupil totalling £145,992.

### **Primary Level:**

- Development serves Y Bontfaen Primary for English Medium schooling (64.5%), St David's for Denominational (16%), Ysgol Iolo Morgannwg for Welsh Medium (19.5%).
- There is no projected capacity at English medium and Denominational level. The Council would therefore seek S106 contributions for 19 primary children (80.5% of total pupil yield of which 64.5% is EM and 16% Denominational) at a cost of £18,249 per pupil totalling £346,731.

## **Secondary**

The percentage split for secondary schooling below is based on data for Cowbridge contained within the education facilities paper of 92.5% attending EM, 2.5% attending denominational and 5% attending Welsh medium.

### **Secondary Level:**

- Development serves Cowbridge Comprehensive School for English medium (92.5%), St Richard Gwyn/BOL for Denominational (2.5%) and Ysgol Gymraeg Bro Morgannwg for Welsh medium (5%)
- No projected capacity within the English and Welsh medium sectors.
- The Council would therefore seek S106 contributions for 17 pupils aged 11 – 16 (97.5% of total pupil yield of which 92.5% is EM and 5% WM) at a cost of £27,498 per pupil totalling £467,466 and 3 pupils post 16 (97.5% of total pupil yield of which 92.5% is EM and 5% WM) at a cost of £29,823 per pupil totalling £89,469. The total secondary contribution required would be £556,935.

### **Overall contribution:**

The overall S106 contribution required for both primary and secondary level is £1,049,658

Please note that the comments at this pre-application stage are for information only and are subject to change following the submission of a formal planning application. This is due to potential changes to the education context in the Vale of Glamorgan which may come forward in the interim period between now and receipt of a formal planning application.

**Public Open Space** – The Councils Planning Obligations SPG ordinarily requires 55.68 sqm of POS provision. This is split between Childrens Equipped Play Facilities (5.8sqm) Childrens Play Space (12.76sqm) and Outdoor Sports (37.12sqm). Given that there is currently an overprovision of outdoor sports space in the Cowbridge Ward, the site would only need to provide 18.56 sq. m of POS provision for every dwelling comprising of Childrens Play Space and a Local Equipped Area of Play.

**Sustainable Transport** – £2,300 per dwelling;

**Community Facilities** – Ordinarily a contribution of £1,260 per dwelling would be required. However, it is noted that the site is an allocated site and no community facilities contribution has been requested by the community facilities background paper for this site.

**Public Art** – 1% of building costs.

In addition, and separate to any obligation sought, the Council requires the developer to pay an administration fee, equivalent to 20% of the application fee or 2% of the total financial contribution being sought, whichever is the greater. This fee covers the Council's costs to negotiate, monitor and implement the terms of the necessary Section 106 agreement.

Further discussion on such matters can, of course, be entered into at the time of an application, or as part of any agreed further pre-application submissions.

### **Required Supporting Documentation**

In addition to the submission of standard mandatory supporting documentation such as application forms, plans and a Design and Access Statement (see TAN 12 Design, Appendix 1), please be advised that any application for the above development should also be accompanied by the following additional documentation:

- Archaeological evaluation
- Design-and-access statement;
- Drainage strategy and plans (foul water and surface water);
- Details of levels and retaining walls /sections
- Landscape and visual impact assessment (LVIA);
- PAC Report ("Major" applications);
- Preliminary ecological assessment (and any other surveys deemed necessary by its author);
- Survey of any trees and hedges affected by the proposal;
- Biodiversity enhancement scheme;

I strongly recommend that a planning application include full details of existing ground levels, retaining structures, proposed ground levels, proposed roof levels and corresponding streetscape images.

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be able to be progressed until its satisfactory submission.

Should you have any further questions regarding the above, please contact Mr. Shafqut Zahoor on the above number.

Yours faithfully,

**Shafqut Zahoor**  
**for Operational Manager Development Management**

**Please Note:**

The advice offered in this response represents an informal opinion, provided in accordance with the Council's Guidance Note on 'charging for pre-application advice'. In particular, it is emphasised that while this pre application advice will be carefully considered in reaching a decision or recommendation on an application, the final decision on any application that you may make can only be taken after we have consulted local people, statutory consultees and any other interested parties. It does not, therefore prejudice any decision which the Local Planning Authority may make should the matter come before them in a formal context.

Date/Dyddiad: 16 March 2022

Ask for/Gofynwch am: Mr. Shafqut Zahoor

Telephone/Rhif ffon: (01446) 704608

Your Ref/Eich Cyf:

My Ref/Cyf: P/DC/2020/00078/PRE

e-mail/e-bost: Planning@valeofglamorgan.gov.uk

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Emma Fortune  
2, Callaghan Square  
Cardiff  
CF10 5AZ

Dear Madam,

**Town and Country Planning Act, 1990 (as amended)**  
**Application No. 2020/00078/PRE**  
**Proposal: Development of 87 residential units along with associated highway and drainage infrastructure**  
**Location: Land off Windmill Lane, and St Athan Road, Cowbridge**

I refer to your correspondence received on 06 Feb 2022, concerning the above and your request for statutory pre-application advice. Having considered the nature of submission in detail and in respect of the amended plans, I respond as follows.

### Proposal

The submission requests pre-application advice for the construction of:

- 87 dwellings with a mixture of market and affordable units;
- An new upgraded access from St Athan Road;
- Public open space and links to an existing open space provision along Llanquian Close;
- Associated drainage infrastructure;
- Upgrading of the public right of way to Windmill Lane.

An extract of the proposed site layout can be viewed below:

## Site off Windmill Lane, Cowbridge.



### Local Context and Constraints

The application site measures approximately 3.8 hectares of agricultural land located to the south of Cowbridge. The application site is located partly within the defined settlement boundary of Cowbridge (a 'service centre settlement' in the LDP's settlement hierarchy). The site is also within a housing allocation ('Land adjoining St Athan Road, Cowbridge').

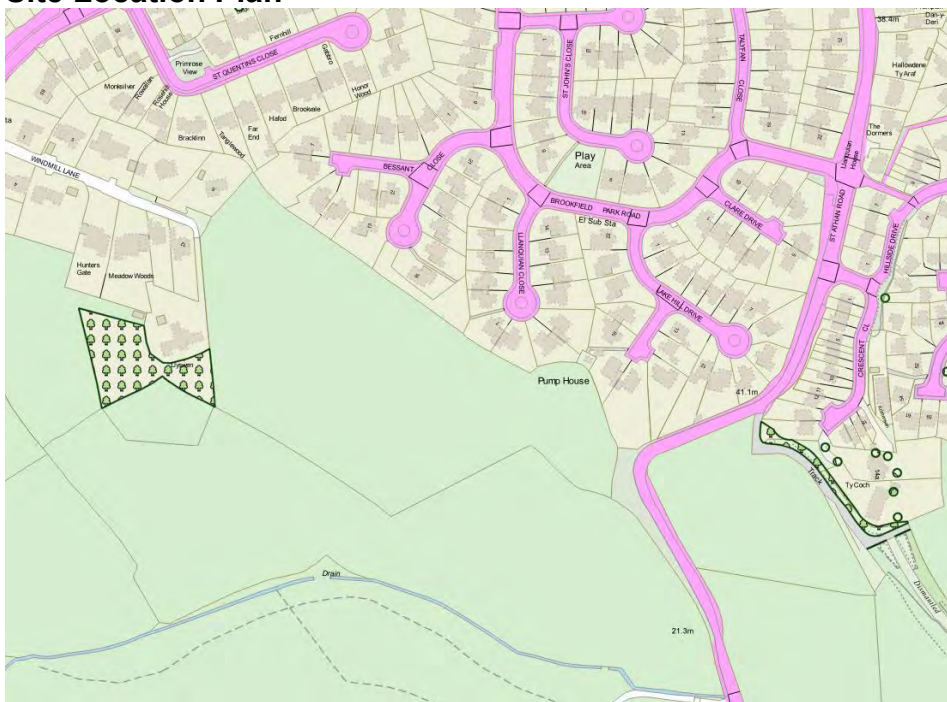
The site topography varies with levels descending quite steeply from west to east. The site is bound by residential dwellings to the north and west and agricultural land to the south and east. The land to the east also forms part of the allocation that the application site is within.

The application site adjoins but is not within mineral safeguarding areas and the Upper and Lower Thaw Valley Special Landscape Area (SLA). A public right of way runs through the site from west to east, and a group of protected trees is next to the site's south-west corner. Council records identify the land as having potential archaeological interest.

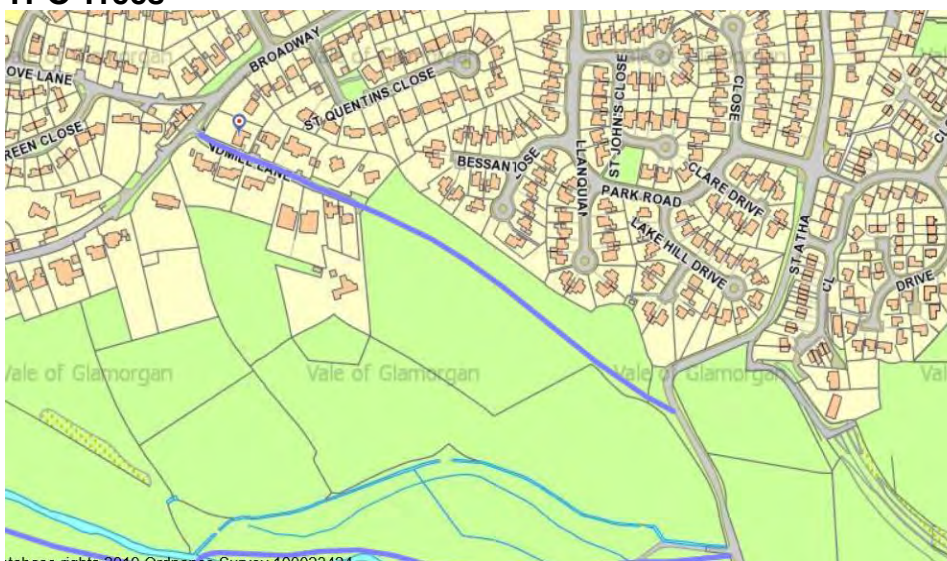
Extracts of the site location plan, PROW plan and a plan showing TPO trees in the area can be viewed below:



**Site Location Plan**



**TPO Trees**



**Public Right of Way**

## Relevant Planning History

From an examination of our records, the application site/ property has the following relevant planning history:

1978/02402/OUT: Proposed to develop the site for housing on a density similar to Brookfield Park – decision: Refused

1979/00649/OUT: Proposal to develop OS 6200 and 7188 for housing on a density similar to Brookfield Park and improve St. Athan Road by new road works affecting OS 8700, 8492 and 8782 – decision: Refused

## **Relevant Planning Policies**

### Local Development Plan:

Section 38 of The Planning and Compulsory Purchase Act 2004 requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the area comprises the Vale of Glamorgan Adopted Local Development Plan 2011-2026, which was formally adopted by the Council on 28 June 2017, and within which the following policies are of relevance:

### Strategic Policies

POLICY SP1 – Delivering the Strategy  
POLICY SP3 – Residential Requirement  
POLICY SP4 – Affordable Housing Provision  
POLICY SP7 – Transportation  
POLICY SP10 – Built and Natural Environment

### Managing Growth Policies

POLICY MG1 – Housing Supply in the Vale of Glamorgan  
POLICY MG2 – Housing Allocations  
POLICY MG4 – Affordable Housing  
POLICY MG6 – Provision of Educational Facilities  
POLICY MG7 – Provision of Community Facilities  
POLICY MG8 – Provision of Health Facilities  
POLICY MG16 – Transport Proposals  
POLICY MG17 – Special Landscape Areas  
POLICY MG19 – Sites and Species of European Importance  
POLICY MG20 – Nationally Protected Sites and Species  
POLICY MG21 – Sites of Importance for Nature Conservation, Regionally Important Geological and Geomorphological Sites and Priority Habitats and Species

### Managing Development Policies:

POLICY MD1 – Location of New Development  
POLICY MD2 – Design of New Development  
POLICY MD3 – Provision for Open Space



POLICY MD4 – Community Infrastructure and Planning Obligations  
POLICY MD5 – Development within Settlement Boundaries  
POLICY MD6 – Housing Densities  
POLICY MD7 – Environmental Protection  
POLICY MD8 – Historic Environment  
POLICY MD9 – Promoting Biodiversity

In addition to the Adopted LDP the following policy, guidance and documentation supports the relevant LDP policies.

### Planning Policy Wales

National planning policy in the form of Planning Policy Wales (Edition 11, 2021) (PPW) is of relevance to the determination of this application.

The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.

### Technical Advice Notes

The Welsh Government has provided additional guidance in the form of Technical Advice Notes. The following are of relevance:

- Technical Advice Note 2 – Planning and Affordable Housing (2006)
- Technical Advice Note 5 – Nature Conservation and Planning (2009)
- Technical Advice Note 6 – Planning for Sustainable Rural Communities (2010)
- Technical Advice Note 10 – Tree Preservation Orders (1997)
- Technical Advice Note 11 – Noise (1997)
- Technical Advice Note 12 – Design (2016)
- Technical Advice Note 15 – Development and Flood Risk (2004)
- Technical Advice Note 18 – Transport (2007)
- Technical Advice Note 21 – Waste (2014)
- Technical Advice Note 24 – The Historic Environment (2017)

### Supplementary Planning Guidance

In addition to the adopted Local Development Plan, the Council has approved Supplementary Planning Guidance (SPG). The following SPG documents are relevant:

- Affordable Housing (2018)
- Biodiversity and Development (2018)
- Design in the Landscape
- Model Design Guide for Wales
- Parking Standards (2019)
- Planning Obligations (2018)
- Public Art in New Development (2018)
- Residential and Householder Development (2018)
- Sustainable Development – A Developer's Guide

- Travel Plan (2018)
- Trees, Woodlands, Hedgerows and Development (2018)

#### Other relevant evidence or policy guidance

- Manual for Streets (Welsh Assembly Government, DCLG and DfT - March 2007)
- Welsh Government Circular 016/2014: The Use of Planning Conditions for Development Management
- Welsh Office Circular 13/97 - Planning Obligations

#### Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act (Wales) 2015 places a duty on the Council to take reasonable steps in exercising its functions to meet its sustainable development (or wellbeing) objectives. This report has been prepared in consideration of the Council's duty and the "sustainable development principle", as set out in the 2015 Act. In reaching the recommendation set out below, the Council has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

#### **Analysis of Proposal**

The principal issues to consider in this application relate to the:

- Principle of development;
- Density;
- Design/Layout/Visual impact;
- Accessibility;
- Amenity space;
- Impact on neighbours;
- Parking Provision & Highway/pedestrian safety;
- Drainage;
- Biodiversity;
- Trees;
- Archaeology;
- Pre-application consultation;
- Planning obligations;

This pre application builds upon the previous pre application advice issued in November 2021.

## Principle of development

LDP policy MD5 (Development within Settlement Boundaries) states that:

*Settlement boundaries have been defined around all the settlements within the LDP settlement hierarchy. New development within these settlements will be permitted where the proposed development:*

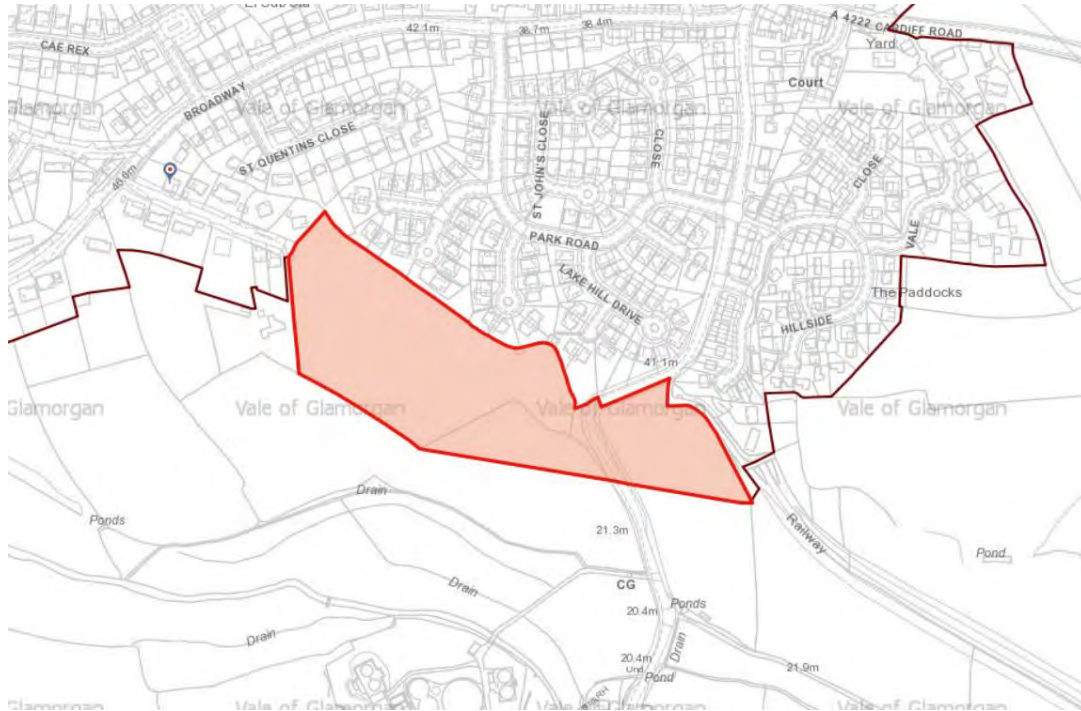
- 1. Makes efficient use of land or buildings;*
- 2. Would not prejudice the delivery of an allocated development site;*
- 3. Is of a scale, form, layout and character that is sympathetic to and respects its immediate setting and the wider surroundings and does not unacceptably impact upon the character and appearance of the locality;*
- 4. The proposal would not result in the loss of natural or built features that individually or cumulatively contribute to the character of the settlement or its setting;*
- 5. Would not result in the unacceptable loss of public open space, community or tourism buildings or facilities;*
- 6. Has no unacceptable impact on the amenity and character of the locality by way of noise, traffic congestion and parking; and*
- 7. Makes appropriate provision for community infrastructure to meet the needs of future occupiers.*

Supporting text to LDP policy MD5 under paragraph 7.33 states that:

*Accordingly to protect the identity of [the Vale's defined] settlements, to ensure the efficient use of land and to protect the countryside from urbanisation and incremental loss, development will only be permitted outside of the identified settlement boundaries where it complies with national planning policy set out in paragraph 9.3.2 of PPW. Such developments would also need to respond appropriately to the local context and accord with Policies MD1 and MD2.*

(Note: Paragraph 7.33 refers to an earlier version of PPW, but the corresponding paragraph in the latest version of PPW is set out below.)

The pre-application site is part of a larger 4.3-hectare housing allocation – 'Land adjoining St. Athan Road, Cowbridge' (see LDP policy MG2(19) – in the LDP:



The LDP allocates the land for 130 dwellings. The corresponding appendix of the LDP states that:

*This 4.3 hectare Greenfield site lies to the south east of Llanblethian, and comprises two parcels of land adjacent to the St Athan Road. Outline planning permission for the whole of the site will be required in order to ensure a comprehensive approach to development and the provision of any necessary infrastructure. Affordable housing will be delivered in accordance with Policy MG4.*

The proposed land use is acceptable given that the site is within a housing allocation within the LDP. Nevertheless, the allocation comprises two parcels of land, only one of which is owned by your client. This matter has been highlighted previously; however I must stress that the LPA would like both sites to be developed as one development. Should this not be possible, the proposal at your client's site must not frustrate plans or impact on the deliverability of the remainder of the allocation.

I note that the current submission includes justification for the pumping station being outside the allocation. It is suggested that given the constraints of the site this is required at the bottom of the site. This justification does not explain why the pumping station and basin could not be accommodated at the lowest part of the allocation. Any formal application will need to justify the extension, although at this stage there are concerns that the dph (as set out below) is contrary to policy and additional land outside the allocation and settlement has been included in the proposal which may be appropriate depending in its wider impacts.

## Density

LDP Policy MD6 (Housing Densities) indicates that residential development proposals within the service centre settlements will be permitted where the net residential density is a minimum of 30 dwellings per hectare. As the pre application proposes 87 dwelling on a site area of 3.82 (ha), the density on site would be well below the 30 dwellings per hectare (dph) required within service centre settlements.

I note that your covering letter suggests that the developable area measures 2.64 ha which would satisfy the 30 dph. However, the policy takes matters such as roads into consideration, although may not consider the suds requirements. Nevertheless, your interpretation still relies on the affordable units to bring the overall dph up to meet the policy. The covering letter goes on to suggest that the proposed site has constraints with levels/drainage and has been designed with the character of the surrounding detached dwellings in mind. Character and context take many forms, and it is clear from policy MD6 and PPW that there has been shift in density aspirations when comparing to development approved historically. Therefore, whilst I understand there are large, detached dwellings along Windmill Lane and to the north of the site, the application site is subject to current adopted policies. The market housing dph level is still considered unacceptable. It is clear from the revised layout that there is still scope for more semi-detached dwellings that could easily replace large, detached dwellings and bring the density up. Should the proposal come before us in a formal manner, it is unlikely to be supported in current density aspirations, in the absence of any robust supporting evidence as to why any higher density cannot be achieved.

Whilst the policy MD6 does allow for a reduction where there are site constraints, it is clear from the layout that the layout is being dictated by the applicants aspirations for the site rather than making best use of space which forms the basis of policy MD6.

In addition, I note that the whole allocation of 4.3-hectare housing allocation (MG2(19)) is required to provide 130 dwellings. The 3.8-hectare pre-application site accounts for 88% of the allocated area which should allow for 114 dwellings. An 87-dwelling proposal would still result in a significant shortfall of the overall 130 of the allocated dwellings and still fall short of the 114 that should be accommodated on this parcel. As discussed, whilst some semi-detached units have now been introduced, we feel that there should be a better mix of house size with the provision of some smaller or linked groups of market house to increase the density on site, the variety of which can be used to provide a better mix through the site and provide an opportunity for better placemaking. This would also serve to reduce the stark contrast between the market and affordable units in terms of plot sizes and housetypes.

In addition, it would appear that you do not intend to meet the entire allocation's requirement for public open space on this site. Therefore, there could be unreasonable pressure on the remaining part of the allocation to accommodate 43 dwellings on only half a hectare of land (at a residential density of 86 dwellings per hectare).

At this stage of the submission, the LPA have significant concerns in relation to the piecemeal format of delivering the allocation and the overall density. I am concerned that despite several pre app submissions being made, little improvements have been gained in the fundamental concerns raised. I urge you to give this matter very serious consideration prior to formally submitting an application.

### Design/Layout/Visual impact

LDP policy MD5 (Development within Settlement Boundaries) states that:

*Settlement boundaries have been defined around all the settlements within the LDP settlement hierarchy. New development within these settlements will be permitted where the proposed development:*

- *Is of a scale, form, layout and character that is sympathetic to and respects its immediate setting and the wider surroundings and does not unacceptably impact upon the character and appearance of the locality;*
- *The proposal would not result in the loss of natural or built features that individually or cumulatively contribute to the character of the settlement or its setting.*

The pre-application site descends quite steeply from west to east, and I note from the meetings that this presents challenges when designing the site, particularly in terms of highway geometry and gradients. However, as discussed, the LPA have significant concerns in relation to the character and layout of the proposal. The design still appears to follow a very traditional suburban layout with cul- de – sacs, where the site has a spine road with small private drives accessed off the main road.

The submitted layout can be developed further, and partly due to the dominance of detached market housing offers little variety in terms of designs and property styles. We welcome the additional semi-detached dwellings and the amendments to the POS area layout. However, the layout still presents on the whole large detached dwellings for the market housing and terraced blocks for affordable units. The layout would be contrary to the advice within PPW, plays little regard to placemaking or guidance set out within Manual for Streets.

Furthermore, all the affordable units are grouped together on secondary no through roads and appear cramped within the overall layout when compared to the market housing. I note that the dwellings would meet DQR standards (2021), however these elements relate poorly to the rest of the site. It also clearly demonstrates that density could be increased on the site if the same standards sought for the affordable housing were considered for market housing. Given that 40% of the dwellings on site will be affordable, they must be fully integrated within the development and would not be supported in the current layout.

In respect of materials and finishes, I note that the house types provided rely mainly on brick finishes with part render on some units. This would be

contrary to the advice provided which stated that render was a prominent feature on dwellings in the locality. Comments provided previously advised that where units were located on corners, they should be designed as corner turning units to create more active facades on the secondary side elevations. This has not been reflected in the current submission.

As discussed, the affordable units have been designed with banks of parking to the front. It is clear from your site layout that this design principle is not afforded to the market houses and therefore I urge you consider the layout, design and siting of the affordable units and its parking with more imagination as we discussed at the meeting. The addition of landscaping along the parking banks is encouraged and welcomed. However, this has not overcome the fundamental issue of poor design.

Plots 5-9 appear shoehorned into the site close to the residential boundary of existing dwellings to the north. In addition, the relationship between these units and plots 10-13 could result in overlooking between these neighbouring properties.

In terms of Public Open Space, the Councils SPG requires 18.56 square metres of POS for every dwelling on this site, relating to equipped and non-equipped childrens play. This is on the basis that there is currently an overprovision of outdoors sport. Notwithstanding the comments relating to density above, based on 87 units the site should provide 1614 sqm of POS on site.

The proposed layout has included a central area of POS of 400 sqm and two other areas along the boundary with Windmill Lane and St Athan Road. This still falls short of the required POS and the additional areas along the boundary with St Athan Road and Windmill Lane appear to be leftover areas that whilst may offer some public benefit and visual amenity do not appear to be designed for any particular purpose. This could result in conflict with residents of plot 31-32 and would therefore need careful consideration. In addition, the space along St Athan Road would not be particularly inviting with a road adjacent.

You may recall that discussion also included making the POS a focal point within the site. Based on the current layout, whilst some revisions have been made, the POS still appears shoehorned into this area of the site. There would be a missed opportunity if the site was not designed with POS forming a more prominent feature within the overall site layout. The central area of POS should be widened to create much more of a meaningful area and meet the POS requirements.

You have intimated that the levels of the site require open areas of land behind some of the houses to avoid the use of retaining walls. These areas would not be overlooked and could provide cover for anti-social behaviour. I appreciate that the levels of the site difficult. However, redundant spaces such as this cause concern especially in respect of maintenance, crime prevention and anti-social behaviour. Further consideration should be given to such areas to better integrate these into the site.

Any retaining walls should be carefully designed and located so that they do not dominate the site or make it look 'over-engineered' and should be detailed at planning application stage.

The site is adjacent to, but not within an SLA. The Principal Landscape Architect has previously advised that any formal planning application should be supported with a LVIA. The proposal includes a rain garden and pumping station which fall within the SLA. No details have been provided as to how the boundary of the site would be formed. No benching details have been provided for the rain garden and the layout includes an access track along the edge of the rain garden. Given how exposed the site is and any potential level changes, this aspect of the proposal does raise some initial concerns in respect to visual amenity impacts.

There are significant concerns relating to the over engineered turning heads at the end of each cul de sac and adjacent to the pumping station. This should be reviewed and any surfacing serving the pumping station should be informal such as grasscrete and better integrated to limit its impact.

In summary, despite some design evolution from the previous pre application schemes, the proposed layout still fails to create the kind of high-quality built environment sought on an allocated site within the Vale of Glamorgan. I would urge you to be more imaginative and take comments on board.

### Accessibility

LDP policy MD2 (Design of New Development) states that:

*In order to create high quality, healthy, sustainable and locally distinct places development proposals should:*

- *Provide a safe and accessible environment for all users, giving priority to pedestrians, cyclists and public transport users (criterion five).*

A layout consisting of a spine road and several dead ends is unlikely to create a convenient and enjoyable environment for walkers and cyclists. Instead, journeys made on foot or by bicycle are likely to be indirect. I strongly recommend that you consider a more permeable layout. A grid-based design, for example, would almost certainly create a busier, safer and more sociable estate.

There should be pedestrian connectivity connecting the end of the cul-de sacs, where houses at the end of the cul-de-sacs could be re orientated to front onto the footways. This would create a much more permeable form of development.

No details have been provided in respect of connectivity around the attenuation basin and along the southern boundary of the site. There is scope to make a feature of the attenuation basin and to allow pedestrian connectivity along the boundary of the site allowing future residents to walk along the edge of the site from Windmill Lane to the main entrance along St



Athan Road.

We welcome the pedestrian connectivity through the area of POS into the adjacent area of POS in the existing residential development. To improve the visual connectivity into the adjacent area of POS development, it is likely that the section of hedgerow between the two area of POS would likely have to be removed or thinned out.

Future residents should be able to walk and cycle along Windmill Lane and through the Brookfield Park Road estate to the north. Creating the necessary connections would not only help to integrate the new housing into the settlement but also provide residents with safe and convenient routes to the town centre.

### Amenity space

Paragraph 10.1 of the Residential & Householder Development SPG states:

*For the purposes of this Guidance, amenity space associated with residential properties includes front gardens and private rear gardens. It does not include footpaths, driveways and parking areas. Amenity space is essential and provides a number of important functions that contribute towards a resident's enjoyment of a property. Those essential functions include space for relaxation, entertainment and play; gardening and cultivation; clothes washing and drying; DIY; and waste, cycle and other domestic storage.*

Design Standard 4 of the SPG states:

*For houses, a minimum of 20 sq.m amenity space per person\* should be provided, and the majority should be private garden space.*

*\*typically a 2 bed house would have 3 persons, 3+ bedrooms would typically have 4 persons.*

The first two 'key principles' of paragraph 10.3 are:

- Proposals for new houses or conversions to create new dwellings and new householder development must ensure that an adequate provision of amenity space is provided and maintained;
- Private (usually rear) gardens should be of a useable shape, form and topography.

In terms of amenity space, the affordable units still fall short of the level of amenity space required by the SPG. This aspect of the proposal does not appear to have been addressed despite previous requests.

A number of properties still have large extended drives with garage set into the plot. This reduces the level of useable amenity space serving each property and depending on the scale of the garages provides a dominating structure within the rear garden. This aspect of the layout still needs further consideration.

The proposed dwellings should meet the SPG's targets for the amount of space. But they should also have *good-quality* amenity space that is comfortable, private, light and usable in every way. In particular given the sloping site, you should ensure that all amenity space is usable avoiding any steep gradients. I recommend that a supporting statement specify the amount of amenity space provided for each dwelling.

I note from the cross sections provided that the levels have been amended to reduce the difference between properties. This is a welcomed improvement and should be the case for all plot-to-plot relationships. Full site cross sections with level details will need to be provided in any planning application.

### Impact on neighbours

LDP policy MD2 (Design of New Development) states that development proposals should 'safeguard existing public and residential amenity, particularly with regard to privacy, overlooking, security, noise and disturbance'.

LDP policy MD7 (Environmental Protection) states that:

*Development proposals will be required to demonstrate they will not result in an unacceptable impact on people, residential amenity, property and / or the natural environment from either:*

- 1. Pollution of land, surface water, ground water and the air;*
- 2. Land contamination;*
- 3. Hazardous substances;*
- 4. Noise, vibration, odour nuisance and light pollution;*
- 5. Flood risk and consequences;*
- 6. Coastal erosion or land stability;*
- 7. The loss of the best and most versatile agricultural land; or*
- 8. Any other identified risk to public health and safety.*

*Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed or legal obligation entered into, to secure any necessary mitigation and monitoring processes.*

The Residential and Householder Development SPG sets out advice on development proposals and their effect on residential amenity, judged in terms of artificial light, natural light, noise, outlook, privacy, among other things. I recommend that you read section nine in particular.

### Parking Provision & Highway/pedestrian safety

Criterion 5 of Policy MD2 of the LDP requires that the development meets the Council's standards to provide a safe and accessible environment for all users, giving priority to pedestrians, cyclists and public transport users on amenity and space, access, car parking and servicing.

Policy 6 states that proposals should have no unacceptable impact on highway safety nor cause or exacerbate existing traffic congestion to an unacceptable degree.

The Parking Standards SPG places the site in Zone B: Urban. It recommends that houses and flats in Zone B have one off-street parking space for each bedroom, up to a maximum of three spaces, and that housing sites have one visitor space for every five dwellings. You should note that driveways of excessive length to the front of garages which can accommodate more than three spaces are unlikely to be considered acceptable, given that these set back garages can reduce usable amenity space and also reduce the quality of amenity space.

Paragraph 5.1 of the SPG states that:

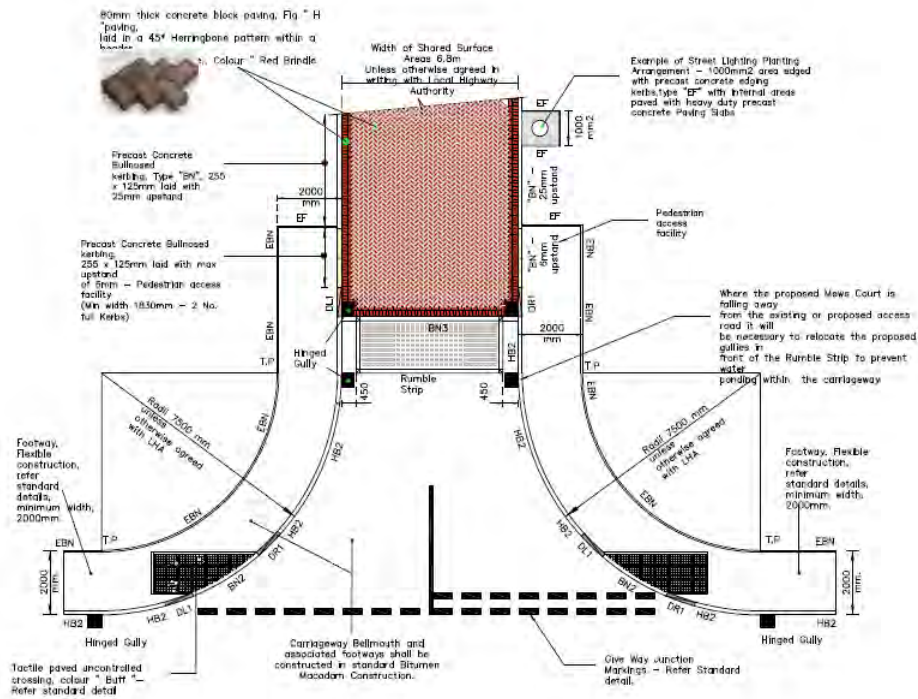
*In accordance with national policy and guidance, the standards set out in this SPG should be interpreted as **maximum** rather than minimum standards i.e. they are 'not more than' figures [original emphasis].*

Any formal planning application should be supported with a transport assessment, a construction environment management plan and an construction traffic management plan.

The Councils Highway Authority have considered the revised proposals and have the following comments:

Comments in conjunction with marked up drawing sketch scheme.

1. All traditional carriageways with 2x2m wide footways to be minimum 5.5m wide.
2. All shared surface to be 6.8m wide as shown, with localise widening of 2-2.4m to allow for visitor parking.
3. Traditional carriageway with 2x2m wide footways to interface with 6.6m wide shared surfaces as below detail:



Plan View of Typical Access to Block Paved Shared Surface Incorporating Raised Ramp or Flush / Rumble Strip - (Minimum width 6.8m) (Scale - N.T.S)

4. The footway link dropping out onto the shared surface to be 3.5m wide shared cycle/pedestrian surface; to connect to a 2m wide footway. Extend the traditional 5.5m wide +2x2m footway carriageway passed this point to create a connection to a footway. The link to be relocated to avoid being opposite the opposing junction, for safety reason with children running/cycling out to opposing vehicles.
5. As comment 4, approximate location for change to shared surface.
6. Parking space/driveway too close to radius entrance to road.
7. Provide 2m footway both sides of carriageway throughout section of road. Will also provide safe access out of parking spaces for pedestrians to plots 6-9. This section of road could be a mews court construction in block paving and a 4.8m wide carriageway, rumble strip to be located at entrance.
8. No access provided from parking spaces for pedestrians to access the plots, the turning head looks smaller and maybe substandard, tracking for 11.22m refuse vehicle required.
9. The footway/cycleway access onto carriageway to be at a more central location, away from parking/driveway to plot 31. The footway/cycleway to be 3.5m wide.
10. Not sure if road is to be offered up for adoption or remaining a private drive, if to be adopted then 2m wide footway both sides of the carriageway or a shared tarmac private access road.
11. Although a preliminary sketch the layout needs to take account of:

- Street lighting locations, which is more of an issue within shared surfaces in relation to the tree locations and pedestrian access points to the plots.
- Visibility splays out of each side road onto the main access road in relation to the proposed trees and 3<sup>rd</sup> party private land.
- Forward visibility along access road in relation to the proposed trees and 3<sup>rd</sup> party private land.

<p><b>VISIBILITY REQUIREMENTS – HIGHWAY SAFETY</b></p> <p>Please ensure that all vision splays and forward visibility envelopes are within highway land and not across 3<sup>rd</sup> party land.</p>
<p><u>Primary Routes – 30mph.</u></p> <p>Carriageway Tarmacadam, width 5.5m with 2m footways either side  Junction – “Y” distance = 43m, “x” distance = 3m  Forward visibility along road/bends = 43m</p>
<p><u>Primary Routes – 20mph.</u></p> <p>Carriageway Tarmacadam, width 5.5m with 2m footways either side  Junction – “Y” distance = 25m, “x” distance = 3m  Forward visibility along road/bends = 25m</p>
<p><u>Secondary Routes – 20mph.</u></p> <p>Carriageway Tarmacadam, width 5.5m with 2m footways either side  Junction – “Y” distance = 25m, “x” distance = 2.4m  Forward visibility along road/bends = 25m</p>
<p><u>Shared Surfaces – 15mph.</u></p> <p>Carriageway block paved, clear width 6.8m with localised widening of 2-2.4m for visitor parking.  Junction – “Y” distance = 25m, “x” distance = 2.4m  Forward visibility along road/bends = 17m</p>
<p><u>Private Drives – 15mph/10mph</u></p> <p>“Y” distance = 25m  Forward visibility along road/bends = Max 17m, Min 11m</p>

- Gradients of shared surface carriageways for permeable paving, max gradient 1:20. (if permeable paving is being specified).
- Tracking required for a 11.22m refuse vehicle to check scheme layout is achievable.
- Drawing to shown full dimensions for carriageway widths and kerb radius.

## Site off Windmill Lane, Cowbridge.



## Drainage

With effect from 7 January 2019 and with the exception of single dwellings and/or developments with a “construction area” of less than 100 square metres, all construction work requiring planning permission which has drainage implications will need Sustainable Drainage Approving Body (SAB) approval.

SuDS are intended to maximise the opportunities and benefits that can be provided by the effective management of surface water. This can only be achieved when the principles of SuDS are considered at the outset of the development process. The SuDS approach to surface water management will direct the development process and shape the layout of new developments around site drainage.

A Sustainable Drainage Approving Body (SAB) application must demonstrate compliance with the statutory standards, following a set of principles in the design of the system and satisfy the standards in relation to runoff destination, hydraulic control, water quality, amenity, biodiversity, construction, operation and maintenance.

The SAB approval process is separate from the planning application process. An application for approval for a surface water drainage scheme may be made to the SAB separately from, or combined with a planning application. The planning and SAB approvals are independent systems and there may be circumstances where separate applications are appropriate.

*This site is not located in DAM zones at risk of tidal or fluvial flooding and NRW maps indicate that there is a very low to low risk of surface water flooding to the site. However, it is noted that the adjoining site falls within a C2 Floodzone.*

My colleagues in the Drainage Team have advised me that a SAB pre-application submission has been submitted and they have responded advising that they have no objection in principle subject to compliance and subject to you providing acceptable level of details requested. This remains the case for the amended layout under consideration in this pre application submission.

### Biodiversity

Policy MD9 of the LDP is most relevant in respect of ecology matters, and it states 'New development proposals will be required to conserve and where appropriate enhance biodiversity interests.

The Council's Biodiversity and Development SPG (2018) requires new development to provide ecological enhancements to promote biodiversity within the Vale of Glamorgan.

Criterion 10 of Policy MD2 requires development to incorporate sensitive landscaping, including the retention and enhancement where appropriate of existing landscaping features and biodiversity interests.

I note that the proposal includes the loss of trees, hedgerows and grassland. These biodiversity features are likely to be habitat for reptiles and animals. Given this, and the likely loss of such habitat and features, any formal application will require a preliminary ecology assessment.

As aforementioned, a number of protected trees are located close to the site boundary. Therefore, any formal application should be supported with a tree impact assessment and any proposed dwellings located close to the tree should be sited sufficient distance so that they do not cause amenity issues for any future occupants.

Any formal application should also be supported with a biodiversity enhancement scheme identifying timescale of implementation and detailed design.

### Archaeology

Policy MD8 'Historic Environment' requires that development proposals must protect the qualities of the built and historic environment including criterion 4 that relates to the preservation or enhancement of archaeological remains and where appropriate their setting.

Glamorgan Gwent Archaeological trust have reviewed the submitted reports and confirm that further archaeological investigations/mitigation work will be required. I believe you have liaised directly with GGAT and understand the requirements for the site.

### **Pre-Application Consultation**

For all applications for 'major' development, there is a statutory requirement for the applicant / developer to consult the community and relevant statutory

consultees, and to submit a Pre-Application Consultation (PAC) Report with any application.

Detailed advice can be found here:

<http://gov.wales/docs/desh/publications/160129annex-1-pre-application-consultation-en.pdf>

## **Planning obligations**

The Council's Planning Obligations Supplementary Planning Guidance (SPG) provides the local policy basis for seeking planning obligations through Section 106 Agreements in the Vale of Glamorgan. It sets thresholds for when obligations will be sought, and indicates how they may be calculated.

The Council's SPG is available to view/ download at:

<http://www.valeofglamorgan.gov.uk/Documents/Living/Planning/Policy/SPG/Planning-Obligations-SPG-2018.pdf>

Following consideration of the proposed development and potential impacts and needs arising from the development, I would advise that the Council is likely to seek planning obligations covering the following:

**Affordable Housing** – 40% of the proposed units; I note that the submitted layout proposes 35 units which satisfied the % AH requirements of the SPG. The Council will also seek 70% to be for rent with the remaining 30% to be for Low Cost Home Ownership (LCHO).

The application proposes a mix as follows:

12 no. 1 bed apartments  
14 no. 2 bed houses  
8 no. 3 bed houses  
1 no. 4 bed house

All AH properties need to be WDQR (2021) compliant. We would expect the developer to work with a named RSL to deliver these properties.

As stated above, consideration must be given to better distributing the location of the AH units through the estate, rather than limiting them to the secondary roads.

**Education** – Based upon the proposed 87 units available for S106 purposes, this would generate the following pupil requirements:

- 8 Nursery pupils
- 21 Primary pupils
- 21 Secondary pupils - 17 pupils (aged 11-16) and 4 pupils (post 16)



A breakdown of the impact of the pupil requirements on the planning obligations for the proposed development is shown below:

### **Nursery and primary**

The percentage split for primary schooling below is based on data for Cowbridge contained within the education facilities paper of 64.5% attending EM, 16% attending denominational and 19.5% attending Welsh medium.

The percentage split for primary schooling below is based on data for Cowbridge contained within the education facilities paper of 64.5% attending EM, 16% attending denominational and 19.5% attending Welsh medium.

#### **Nursery:**

- Development serves Y Bont faen Primary for English Medium schooling (64.5%), St David's for Denominational (16%), Ysgol Iolo Morgannwg for Welsh Medium (19.5%).
- No Capacity at a nursery level except for denominational places (16% = 1 place). The Council would therefore seek S106 contributions for 8 nursery age children at a cost of £18,249 per pupil totalling **£145,992**.

#### **Primary Level:**

- Development serves Y Bontfaen Primary for English Medium schooling (64.5%), St David's for Denominational (16%), Ysgol Iolo Morgannwg for Welsh Medium (19.5%).
- There is no projected capacity at English medium level. The Council would therefore seek S106 contributions for 21 primary children (80.5% of total pupil yield of which 64.5% is EM and 16% Denominational) at a cost of £18,249 per pupil totalling **£383,229**.

### **Secondary**

The percentage split for secondary schooling below is based on data for Cowbridge contained within the education facilities paper of 92.5% attending EM, 2.5% attending denominational and 5% attending Welsh medium.

#### **Secondary Level:**

- Development serves Cowbridge Comprehensive School for English medium (92.5%), St Richard Gwyn/BOL for Denominational (2.5%) and Ysgol Gymraeg Bro Morgannwg for Welsh medium (5%)
- No projected capacity within the English and Welsh medium sectors.

- The Council would therefore seek S106 contributions for 18 pupils aged 11 – 16 (97.5% of total pupil yield of which 92.5% is EM and 5% WM) at a cost of £27,498 per pupil totalling £494,964 and 4 pupils post 16 (97.5% of total pupil yield of which 92.5% is EM and 5% WM) at a cost of £29,823 per pupil totalling £119,292. The total secondary contribution required would be **£614,256**.

### **Overall contribution:**

The overall S106 contribution required for both primary and secondary level is £1,143,477.

I note that your covering letter queries capacity for education contributions. In response I can confirm that the Council is progressing new primary school provision within the Y Bont Faen School catchment area which will provide 210 primary school places and 48 nursery places. The proposed school will be located on land within the Cowbridge Comprehensive School site and will create an All-through School model of education. The proposed primary school would share the same catchment as the existing English medium school Y Bont Faen.

The Council's Cabinet determined to approve the education proposal on 22<sup>nd</sup> March 2021. However, this would be subject to the relevant consents. Planning consent to develop the proposed primary school was approved on 3<sup>rd</sup> March 2022 under application 2021/01537/RG3. It is anticipated that the proposed school will be delivered by September 2023 under the current project timescales.

The main driver for the primary school proposal is to meet increased demand for English medium primary education in Cowbridge as a result of recent and proposed housing developments. The Vale of Glamorgan Local Development Plan (LDP) 2011-2026 provides the local planning policy framework for the Vale of Glamorgan and was adopted by the Council on 28 June 2017. A number of housing developments in Cowbridge have been included in the Council's Local Development Plan 2011 - 2026. This includes the residential development subject to this application referred to as MG2 (19) Land adjoining St. Athan Road, Cowbridge which was allocated for 130 dwellings. It is noted that the application is seeking to develop 87 dwellings on the site, however, these will still contribute to the capacity issues within the catchment area.

The Council's Planning Obligations SPG states "whilst each development will be considered on its own merits, regard will be had to planned growth throughout the plan period so that, where appropriate, the liability for providing new schools places is spread fairly across development sites within a catchment area." (VoG, p.25, 2018). Consequently, as the proposed residential development will contribute to the demand for school places within the catchment area and was considered as the main driver for the Council developing additional English medium primary school capacity it is considered appropriate to request s.106 contributions to address the demand for school places created by the residential allocations in the area including this application.

In terms of existing capacity of primary schools within the area the following information is relevant:

School	Type	Capacity	Number on Roll (Jan 2022)	Surplus (%)
Y Bont Faen	English Medium	210	222	-5.55%
St David's CiW	Denominational	210	182	14.29%
Iolo Morganwg	Welsh Medium	210	175	18.18%

In terms of denominational provision at nursery and primary school level, St David's CiW Primary School has been re-developed to accommodate the predicted increase in capacity and the projected increase of 1 nursery place and 4 primary school places from the proposed residential scheme would result in sufficient capacity remaining at the school. Consequently the denominational split of 16% has been deducted from the Nursery and Primary school financial obligations below. Regarding Welsh Medium places, Iolo Morganwg is close to capacity and factoring other developments allocated within the catchment area would exceed the capacity currently available. To address the projected demand for Welsh Medium places the Council has secured land for educational purposes on the residential allocation known as MG2 (20) Land to the north of Darren Farm which under the current Educational Strategy will be developed as a Welsh Medium primary school. The proposed residential scheme would contribute to the demand for pupil places and the need to provide additional Welsh medium places, therefore, Welsh medium places have been included within the financial obligations below.

The proposed residential scheme seeks to deliver 87 dwellings of which 35 units would be affordable. The formula to calculate the anticipated school place demand is detailed in the Council's Planning Obligations SPG and would result in the following:

Type	No. of school places per dwelling	School place demand
Pre-School	0.1	9
Primary School	0.278	24
Secondary School (11-16)	0.208	18
Secondary School (post 16 years)	0.04	4
<b>Total</b>	-	<b>55 pupils</b>

Please note that the comments at this pre-application stage are for information only and are subject to change following the submission of a formal planning application. This is due to potential changes to the education context in the Vale of Glamorgan which may come forward in the interim period between now and receipt of a formal planning application.

**Public Open Space** – The Council's Planning Obligations SPG ordinarily requires 55.68 sqm of POS provision. This is split between Children's Equipped Play Facilities (5.8sqm) Children's Play Space (12.76sqm) and Outdoor Sports (37.12sqm). Given that there is currently an overprovision of outdoor sports space in the Cowbridge Ward, the site would only need to provide 18.56 sq. m of POS provision for every dwelling comprising of

Childrens Play Space and a Local Equipped Area of Play. This matter will need further consideration based on the current layout.

**Sustainable Transport** – £2,300 per dwelling;

**Community Facilities** – Ordinarily a contribution of £1,260 per dwelling would be required. However, it is noted that the site is an allocated site and no community facilities contribution has been requested by the community facilities background paper for this site.

**Public Art** – 1% of building costs.

In addition, and separate to any obligation sought, the Council requires the developer to pay an administration fee, equivalent to 20% of the application fee or 2% of the total financial contribution being sought, whichever is the greater. This fee covers the Council's costs to negotiate, monitor and implement the terms of the necessary Section 106 agreement.

Further discussion on such matters can, of course, be entered into at the time of an application, or as part of any agreed further pre-application submissions.

### **Required Supporting Documentation**

In addition to the submission of standard mandatory supporting documentation such as application forms, plans and a Design and Access Statement (see TAN 12 Design, Appendix 1), please be advised that any application for the above development should also be accompanied by the following additional documentation:

- Archaeological evaluation
- Design-and-access statement;
- Drainage strategy and plans (foul water and surface water);
- Details of levels and retaining walls /sections
- Landscape and visual impact assessment (LVIA);
- PAC Report ("Major" applications);
- Preliminary ecological assessment (and any other surveys deemed necessary by its author);
- Survey of any trees and hedges affected by the proposal;
- Biodiversity enhancement scheme;

I strongly recommend that a planning application include full details of existing ground levels, retaining structures, proposed ground levels, proposed roof levels and corresponding streetscape images.

If any subsequent application fails to include the information above, there is a chance it may not be registered and, in any event, it is likely that an application will either be refused or will not be able to be progressed until its satisfactory submission.

Should you have any further questions regarding the above, please contact Mr. Shafqut Zahoor on the above number.

Yours faithfully,

**Shafqut Zahoor**  
**for Operational Manager Development Management**

**Please Note:**

The advice offered in this response represents an informal opinion, provided in accordance with the Council's Guidance Note on 'charging for pre-application advice'. In particular, it is emphasised that while this pre application advice will be carefully considered in reaching a decision or recommendation on an application, the final decision on any application that you may make can only be taken after we have consulted local people, statutory consultees and any other interested parties. It does not, therefore prejudice any decision which the Local Planning Authority may make should the matter come before them in a formal context.

**APPENDIX 3**

**Planning Policy Wales 11 – National Sustainable Development Placemaking  
Appraisal Framework Assessment**



Planning Policy Wales 11 – National Sustainable Development Placemaking Appraisal Framework

PPW Placemaking Outcomes	Strategic & Spatial Choices	Active & Social	Productive & Enterprising	Distinctive & Natural	Globally Responsible	Prosperous	Resilient	Healthier	More Equal	Cohesive Communities	Vibrant Culture	Commentary
<b>Maximising Environmental Protection and Limiting Environmental Impact</b>												
Has resilient biodiversity and ecosystems	●	●		●	●		●	●	●	●		There are no statutory or non-statutory designated sites within or immediately adjacent to the application boundary. Habitat surveys undertaken confirm that the application site supports a range of limited ecological value habitats, primarily in the form of intensively grazed species-poor grassland which is of very low ecological value. Whilst the site's boundary vegetation is comparatively greater value, the development proposals will more than offset losses through the provision of a range of species-rich habitats, including new tree planting, hedgerows, wildflower grassland and wetland features. The survey also identified the presence of the non-native invasive species Japanese Knotweed on the eastern boundary of the site. The removal of this species represents a benefit compared to the existing situation. The proposals are considered to result in a net gain of biodiversity enhancements.
Has distinctive and special landscapes	●	●		●	●	●	●	●	●	●	●	The site is not subject to any landscape designations and, indeed, forms part of the land allocated in the Vale of Glamorgan LDP under Policy MG2(19) for residential development at Land adjoining St Athan Road, Cowbridge. The land to the south of the site is however designated as a Special Landscape Area (Upper and Lower Thaw Valley SLA). The site abuts established residential development which forms the town of Cowbridge to the north. A strong landscape buffer is proposed along the site's southern and eastern boundary and as identified above; the proposal will result in net ecological gain.
Has integrated green infrastructure	●	●	●	●	●	●	●	●	●	●	●	The proposals include both formal and informal green infrastructure and recreational space to promote a well-connected and cohesive community. Specifically, the proposals contain a landscaping strategy that includes the retention of boundary hedgerows and trees as well as bolster planting and the provision of additional green infrastructure, ensuring ecological links to the wider area such that the proposal will result in net ecological gain. The removal of the non-native invasive species Japanese Knotweed also represents a benefit on site compared to the existing situation. The proposals also include a new large area of recreational space which will incorporate a LEAP to help ensure the new development is well connected to the existing built form thus promoting active and cohesive communities. Sustainable drainage systems (SuDS) also form an integral element of the site's green infrastructure strategy.
Has appropriate soundscapes	●			●	●	●	●		●	●		Given the site's location at the edge of the settlement bordering open countryside, sources of noise disturbances are low. In terms of the site's future use, residential uses are considered suitable, given its setting adjoining existing residential land use to the north and west and the lack of significant noise sources in the immediate locality.
Reduces environmental risks	●	●		●	●	●	●	●	●	●		Given the site's historical agricultural use there is no known risk of any part of the subject site containing sources of contamination. There are no historical instances of uses of the site involving materials such as: heavy metals, oil, chemical substances, gases, asbestos or radioactive substances. Furthermore, there no known issues regarding ground conditions or stability.
Manages water resources	●	●	●	●	●	●	●	●	●	●		The site is located in Flood Zone A and is therefore not considered to be at risk of tidal or fluvial flooding and NRW maps indicate that there is very low to low risk of surface water flooding to the site. The development will follow the surface water runoff destination priority levels set out in Standard S1 of the Statutory standards for sustainable drainage systems. The current masterplan and design principles have been led by and designed with sustainable drainage measures in mind. A SAB pre-app has been submitted in respect of the development proposals and no in principle objections have

												been raised by the Council's Drainage Officers. Surface water management during the construction of the development is detailed within the Construction Environmental Management Plan (CEMP).
Has clean air	●	●	●	●	●	●	●	●	●	●	●	The site is not located within an Air Quality Management Area and the use of best practice construction methods during construction will ensure no air quality issues will arise during that phase of the development.
Reduces overall pollution	●	●	●	●	●	●	●	●	●	●	●	The development is not anticipated to result in pollution. Again, best practice construction methods will be adopted to ensure no air quality issues will arise during that phase of the development. Furthermore, the site adjoins the settlement boundary of Cowbridge to the north. It is therefore well related to existing and future settlement patterns. The LDP allocated site is also positioned to take advantage of the nearby services and, including sustainable transport routes. As such, the site is ideally situated to reduce car dependency and reduce overall pollution.
Is resilient to climate change	●	●	●	●	●	●	●	●	●	●	●	See points above regarding access to services, facilities and public transport. The site's drainage strategy has been designed to be climate resilient in accordance with standards. The development will also provide a pedestrian and cycle links to the existing established residential area to the north and west and the services and facilities available within Cowbridge itself. The residents of the site will therefore not be reliant on the private car.
Has distinctive and special historic elements	●			●	●	●	●	●			●	The site contains no listed buildings or other heritage assets and is not located within a conservation area. The development is not therefore considered to have an impact in this regard.
<b>Facilitating Accessible and Healthy Environments</b>												
Has accessible and high quality green space	●	●		●	●	●	●	●	●	●	●	As stated above, the proposals include both formal and informal green infrastructure and recreational space to promote a well-connected and cohesive community. Specifically, the site will benefit from a new large, centralised area of open space containing a LEAP which will be framed by adjoining houses to ensure natural surveillance of the open space. The area of open space will also connect to the existing area of open space located to the north of the site at Llanquian Close to provide an opportunity to create an enlarged and more useable area of open space for the benefit of existing and future residents. A landscape strategy which focuses on a strong landscaping buffer along the site's southern and eastern boundary will also be provided.
Is accessible by means of active travel and public transport	●	●	●	●	●	●	●	●	●	●	●	The proposal includes cycle parking and a new pedestrian/cycle link from the site to both the north and the west. These links provide convenient active travels routes directly into Cowbridge and its associated facilities and services. The nearest bus stop to the site is located on Primrose Hill, approximately 550 metres to the north east of the site. Bus service number X2 serves the site and provides links to Cardiff in the east, and Porthcawl to the west. There are also additional bus stops 1km to the north along High Street.
Is not car dependent	●	●	●	●	●	●	●	●	●	●	●	As set out above, the subject site is considered highly accessible via means of active travel and public transport and also situated in close proximity to a range of services and facilities. There are many local facilities, including shops, schools, medical facilities, leisure and sports facilities and commercial premises, as well as bus stops within walking/cycling distance of the site.
Minimises the need to travel	●	●		●	●	●	●	●	●	●	●	As set out in the two rows above, the site will clearly minimise the need to travel as far as practicable.
Provides equality of access	●	●			●	●	●	●	●	●	●	The site is accessible by all modes of transport and the development including 40% affordable housing, also means that the dwellings must be DQR compliant and, as such, will be accessible to all. All homes will be built to the latest Building Regulations standards.
Feels safe and inclusive	●	●		●		●	●	●	●	●	●	The development has been carefully designed to ensure privacy, security and limits overlooking and disturbance. The development seeks to deter criminal activity and anti-social behaviour by minimising opportunities to commit crime or to impact negatively on the quality of life of those using the development with communal areas overlooked throughout thereby providing natural surveillance. The development will therefore feel safe and inclusive.



Supports a diverse population	●	●			●	●	●	●	●	●	●	The development will provide a mix of 1-5 bed properties, including an element of affordable homes. It is therefore considered that it will, because of the housing mix, have the potential to be occupied by a wide range of persons with varying needs.
Has good connections	●	●			●	●	●	●	●	●	●	As previously identified, the site is accessible with existing footways and the new pedestrian/cycle link providing Active Travel opportunities and is within walking/cycling distance of Cowbridge and local bus stops.
Has convenient access to goods and services	●	●			●	●	●	●	●	●	●	As above, there are many local facilities, including shops, schools, medical facilities, leisure and sports facilities and commercial premises, as well as bus stops within easy walking/cycling distance.
Promotes physical and mental health and well being	●	●		●	●	●	●	●	●	●	●	The provision of green infrastructure will help to encourage active lifestyles and create a positive environment to the benefit of physical and mental-health and well-being. Specifically, the site will benefit from a new large, centralised area of open space containing a LEAP which will be framed by adjoining houses to ensure natural surveillance of the open space. The area of open space will also connect to the existing area of open space located to the north of the site at Llanquian Close to provide an opportunity to create an enlarged and more useable area of open space for the benefit of existing and future residents. In addition to the above, the development will create a new (Llanquian Close) and improvement to existing link (Windmill Lane) to the existing public right of right that passes through the site thus creating access to countryside walks.. All dwellings will have access to private open space will also promote physical and mental wellbeing.
<b>Making Best Use of Resources</b>												
Makes best use of natural resources	●		●	●	●	●	●	●	●			The site is within an existing and established urban settlement in close proximity to existing facilities and forms part of an allocation for residential development within the Vale of Glamorgan Council's LDP under Policy MG2(19). Best practice construction techniques will be utilised in order to make the best use of building material resources.
Prevents waste	●		●	●	●	●	●	●				Best practice construction techniques will be utilised in order to minimise waste.
Priorities the use of previously developed land and existing buildings	●											Although the site does not comprise previously developed land, the site is allocated in the Vale of Glamorgan LDP under Policy MG2(19) for residential development at Land adjoining St Athan Road, Cowbridge. The development of the site will therefore meets the housing needs of the Vale of Glamorgan as set out in the LDP objectives.
Unlocks potential and regenerates	●	●	●	●	●	●	●	●	●	●	●	The development will bring forward the majority of an LDP allocated site providing a new large, centralised area of open space containing a LEAP which will also connect to the existing area of open space located to the north of the site at Llanquian Close. The development safeguards the ability for the remainder of the LDP allocation to be delivered. The proposals will therefore bring forward development in accordance with the strategy and objectives of the LDP.
Is of high quality and built to last	●	●	●	●	●	●						The development will be built to a high quality standard expected to a national award winning housebuilder. All properties will be of traditional brick and block structure.
<b>Growing Our Economy in a Sustainable Manner</b>												
Fosters economic activity	●	●	●			●	●		●	●		Short-term economic benefits will be achieved via the construction phase of the development. The increase of population once the development is occupied, coupled with its accessibility to local facilities and commercial outlets will also benefit the sustainability of those facilities.
Enables easy communication	●	●	●		●	●	●		●	●		Communication is not directly relevant to this residential development, but appropriate services will be easily provided for communications such as telephone and super fast/fibre broadband due to its location within the existing settlement.

Generates its own renewable energy	●	●	●	●	●	●	●	●	●	●	●	There is no specific renewable energy element to this residential scheme. The design and build of the new residential dwellings will however meet all relevant building standards in respect of energy efficiency and carbon neutrality. Electric car charging will be made available to all properties within curtilage parking.
Is vibrant and dynamic	●	●	●	●	●	●	●	●	●	●	●	The design of the development, housing mix and the creation of a new large, centralised area of open space will foster activity and vibrancy within the new development.
Is adaptive to change	●	●	●	●	●	●	●	●	●	●	●	The homes are designed to be as flexible as possible with generally larger proportioned rooms and external space. The affordable houses will be required to confirm to DQR standards. Properties will be adaptive to change particularly for an ageing population.
Embraces smart and innovative technology	●	●	●	●	●	●	●	●	●	●	●	Whilst not directly relevant to this residential development, appropriate facilities will be easily provided for digital/internet communications due to its location within the existing settlement.
<b>Creating and Sustaining Communities</b>												
Enables Welsh language to thrive	●	●	●	●	●	●	●	●	●	●	●	The development will be of no detriment to the Welsh language. Cowbridge also has the choice of attending both Welsh or English medium primary and secondary schools.
Has appropriate development densities	●	●	●	●	●	●	●	●	●	●	●	The development will provide 105 units on a 3.8 hectare site which gives a gross density of 28 dwellings per hectare. Taking into account the net developable area, the site has a development density of 37 dwellings per hectare. This is considered appropriate given the proposed mix of 1-5 bed units, the location within an established urban area and to ensure an efficient use of allocated greenfield land.
Has homes and jobs to meet society's needs	●	●	●	●	●	●	●	●	●	●	●	The development will provide range of 1-5 bed units on an allocated LDP in a sustainable location.
Has a mix of uses	●	●	●	●	●	●	●	●	●	●	●	The site is allocated for residential development and whilst doesn't contain a mix of uses, it meets the objectives of the adopted LDP for the delivery of housing.
Offers cultural experiences	●	●	●	●	●	●	●	●	●	●	●	The development is a housing scheme for which the consideration of cultural experiences is not directly relevant. However, a number of initiatives to promote the use of the Welsh language are being integrated into the scheme including the site name (Bryn Melin). Consideration will also be given to street names, signage and householder literature.
Has community based facilities and services	●	●	●	●	●	●	●	●	●	●	●	As stated previously, the site is accessible to a range of local facilities including shops, schools, medical facilities, leisure and sports facilities and commercial premises. The site will also provide a new large, centralised area of open space containing a LEAP which will also connect to the existing area of open space located to the north of the site at Llanquian Close. This will provide an opportunity to create an enlarged and more useable area of open space for the benefit of existing and future residents.