

# Formal Representation Against Inclusion of Site 370 – Bryn Melin in the Vale of Glamorgan RLDP

Made By: **Thaw Valley Group.**

## 1. Introduction & Purpose

This representation objects to the proposed allocation of **Site 370 – Bryn Melin**, Cowbridge/Y Bont-faen (approx. **3.89 ha agricultural land**) as a housing site in the Deposit Vale of Glamorgan RLDP on the basis **soundness** and **sustainability**, in accordance with the tests set out in national planning policy and guidance.

The site is currently a “roll-forward” of an existing LDP allocation, but **up-to-date evidence demonstrates significant adverse landscape, ecological, and sustainability impacts that outweigh any justification for continued allocation.**

## 2. Summary of Grounds for Objection.

### 1. **Inconsistent with Local Strategy and Settlement Pattern**

Site 370 was treated as a “roll-forward allocation” because it was previously included in the adopted 2011–2026 LDP. However, the evidence now suggests that **sufficient existing housing supply exists in Cowbridge** and that further expansion into greenfield land to the west of the town **is not required** to meet housing needs. Since the LDP was approved there has been an additional 25% additional houses in Cowbridge.

### 2. **Environmental and Landscape Impact**

Bryn Melin is **predominantly agricultural land** on the rural edge of Cowbridge.

Development here would contribute to the **loss of open countryside**( including a well used country footpath) undermining landscape character and local rural amenity. This farmland contributes to the **local rural setting and scenic quality** of Cowbridge's western edge — a setting that should be protected. The Deposit Plan includes an **Integrated Sustainability Appraisal (ISA)** that places significant weight on environmental protection and the prudent use of land. Allocating greenfield sites like Bryn Melin appears inconsistent with the ISA's objectives unless exceptional justification is provided. Site 370 is clearly shown on the VoG latest landscape document( supporting document evidence base) BP28 Nov 2025 Fig 2 as lying within the special landscape area of the Thaw Valley .The **Upper Thaw Valley and rural landform surrounding Cowbridge is recognised for its scenic quality and intervisibility with the town's historic setting.**

Development here would change perceptions of the **transition between built and natural environments**, undermining the peaceful character that local strategy seeks to protect.

### 3. Biodiversity & Habitat Concerns

#### 3.1 Rich Local Biodiversity

The **Bryn Melin site supports a diverse range of species and habitats** , many of which are recognised as **biodiversity priorities** under the Local Biodiversity Action Plan. Many species have been identified and recorded including **brown hares, skylarks, amphibians, bats, badgers and other species** characteristic of high nature value farmland.

#### 3.2 Habitat Networks and Connectivity

The Vale's biodiversity strategy emphasises the importance of **habitat connectivity and protection of SINCs (Sites of Importance for Nature Conservation)** across the rural landscape.

Allocating agricultural land at Bryn Melin will:

Fragment local habitat networks that support foraging and movement of wildlife.  
Harm **species-rich hedgerows** and other features that are present .Reduce resilience of ecological networks at a time when strategic habitat protection and enhancement is a planning priority.

### 3.3 Local Biodiversity Partnership Priorities

The **Vale Nature Partnership** has identified habitat protection and restoration as a priority objective, including **grasslands, hedgerows, watercourses and other key farmland features**.

Allocating this site for housing conflicts with this biodiversity agenda unless exceptional mitigation and enhancement measures are demonstrated — which have not been adequately evidenced at the Deposit stage.

## 4 Planning Policy & Soundness Issues

### 4.1 Sustainability Tests

The RLDP must demonstrate that all allocations meet the **soundness tests** of being justified, effective and consistent with national policy.

The sustainability tests carried out for site 370 Bryn Melin appear to be flawed and based on an inaccurate evidence base. Furthermore when the sustainability tests for other sites in Cowbridge are compared, there appears to be comparison errors and a bias towards including the Bryn Melin site.

This summary below highlights differences in the assessment for the various sites where we believe there is an obvious error. The assessment is sometimes subjective (ie landscape etc) but in a lot of areas is specific. The headings are given a green, amber or red assessment based on no issues, issues which can be overcome or a serious impediment.

#### **Wildlife Corridors, Green Networks or Stepping Stones.**

370 Bryn Melin. Amber

*Potential for adverse impact upon stepping stones, green networks or wildlife corridors but appropriate mitigation measure can be implemented to avoid significant damage. Designed with maximum retention of existing hedgerows is required and that they are unlit from street lighting.*

Keeping the hedgerows and keeping them unlit is hard or impossible to achieve given the proposed location of pedestrian access.

514 Land east of St Athan Rd.

This is in a similar location to Bryn Melin but has been given a Red category.

### **Historic Environment**

367 Land South of Llantwit Major Rd.

This site has been given a red category (The same as Bryn Melin) in stark contrast to site 440 below.

The site is close to an ancient monument but is separated from it by a wide wooded area. The report states that part of the site is within the ancient monument but this does not appear to be the case from the maps of the proposed site and the ancient monument map. It mentions Cadw should be contacted and Cadw provide a permitted planning service but it appears no one has contacted Cadw.

440 Land North of Church Rd Llanblethian.

This plot is closer to the ancient monument (Hill Fort) but has been given an amber designation. Stating that Cadw should be consulted and that the site borders an ancient monument

### **Special Landscape area and Glamorgan Heritage Coast Designation**

370 Bryn Melin. Amber

The council state the south east corner of the site is located within the Upper and lower Thaw Valley SLA but according to figure 2 of the Vale of Glamorgan Designation of Special Landscape Areas background Paper , the whole of the site is in the SLA, The amber designation means *the development may result in little or no change in character and little or no effect on landscape.*

This in contrast to site 367 Land east of St Athan road which they acknowledge is in the SLA and *state Further Consideration required on landscape Character and visual amenity.* More particularly site 455 Primrose Hill is Red. Although it is technically within the Thaw valley landscape area, development will not impact the thaw valley landscape in the same way as Bryn Melin 370 and land east of St Athan rd 367 which are both cited as Amber.

The Category for site 455 is red and the report states

*The site is located within a Special Landscape Area/The Glamorgan Heritage Coast and development is likely to result in a substantial change in character and/or significant adverse effects on landscape character and visual amenity. The Upper and Lower Thaw Valley SLA.*

This statement applies equally if not more so to sites 370 Bryn Melin and 367.

The planning inspector when refusing permission previously stated about site 370 Bryn Melin

*The proposal would result in an undesirable and conspicuous extension of the built-up area of Cowbridge southwards into open countryside comprising the River Thaw Valley, which area has been identified as a Special Landscape area in the Structure Plan.*

The council assessment document BP16 states

*Development proposals within Special Landscape Areas and the Glamorgan Heritage Coast will be required to fully consider the impact of the proposal on the designation 27 | V a l e o f Glamorgan Candidate Site Assessment Methodology through the submission of a Landscape and Visual Impact Assessment. The assessment must consider the site and its relationship to the designation and acceptability in terms of scale and prominence. The Council shall also undertake an assessment of sites as part of the Placemaking Site Appraisal (Section 5 below) and shall enable the Council to eliminate sites where the impacts are significant mitigation.*

## **Topography and Site Conditions.**

370 Bryn Melin. Green

*The site is free from constraints.*

This is not true. The site is severely sloping at 11.5% and according to the developer causes difficulties.

All other sites that are sloping are defined correctly.

### **Tree Preservation Orders, Hedgerows and Woodlands.**

370 Bryn Melin. Green

Report states. *No TPOs present on site, and the proposals would not lead to significant tree loss. The site is bounded by hedgerows.*

The current proposal includes the removal of a long section of hedgerow into an existing play area and the removal of trees in the play area that have not been surveyed.

514 Land south of Llantwit major road . Red

The report states. *A significant loss of TPOs.*

This should be amber as there is only a potential loss of TPOs depending on the layout of the development. In addition the council have stated the position of the site at the deposit stage in BP18a.

*It is noted that the following a historic felling of trees, the loss of protected trees would not be a significant constraint. However, it is considered that there are sufficient housing sites allocated and within the existing supply in Cowbridge and a further greenfield extension to the west of the town is not required unless other sites do not proceed.*

This statement regarding trees suggests that the site should be amber for Trees.

Also with regard to the impact on the setting of the ancient monument which gives the site a red category. The monument is not visible from the site and is protected from view by a stretch of trees.

### **Access to Services and Facilities.**

Bryn Melin site 370 has been classified as Green for access to Retail, Primary schools, community facilities and green open spaces, whereas 455 Primrose Hill has been designated Amber because of the walking distances. Because of the actual walking distances, the distances are further for Bryn Melin and all these

should be amber with the exception of primary school which should be green for both sites.

### **Highway Accessibility.**

Bryn Melin is given an Amber designation, the **same** as all of the other sites. In the original LDP inclusion for this site 370, the council specified that the development should include realignment of the highway because of the highway issues

It is obvious, that of all the sites, access is difficult or impossible to achieve to meet the guidelines on this site given the severe constraints and it should be given a red designation. The criteria in BP16 states for red.

*Major highway constraints -Insurmountable safety issues and/or the or cost of mitigation measures likely to render scheme not viable. Where unsafe highway access is proposed or existing access cannot be upgraded in accordance with the Council standards, or costs of providing safe access and egress are considered to impact on site viability the site shall be excluded from further consideration..*

### **Climate Change.**

Bryn Melin 370 receives a red for this category compared to the other sites as no improvements above building regulations are proposed .

*PPW states that the "The planning system should support new development that has very high energy performance, supports decarbonisation, tackles the causes of the climate emergency, and adapts to the current and future effects of climate change through the incorporation of effective mitigation and adaptation measures." (paragraph 5.8.1 refers)*

### **Placemaking, Character and place.**

These sites are supposed to have been visited by the planners to assess the following sub categories . These assessments would be better carried out by the local council. BP 16 states:

*Where there are a few sites within a settlement, those which score overall proportionately positively against the criteria shall be ranked above those which*

*result in a disproportionate number of negative scores. If the assessment had been carried out correctly, other sites in Cowbridge would have ranked higher.*

**Relationship to and compatibility with existing built form, layout, scale density, building types.**

Bryn Melin 370 receives green, whereas 367 south of Llantwit major road receives amber and 455 primrose hill receives red. Why the difference?

**Visual Impact on landscape/streetscape/historic environment.**

Bryn Melin receives amber but sites 367 and 455 receive red. Why?

**Significance of the site to the area.**

Bryn Melin receives amber but sites 367 and 455 receive red. Why?

*The council previously had refused permission because The development would also detract from existing local amenities by changing the character and route of a public footpath which is important to local residents in the area/ And this was endorsed on appeal by the inspector The value of the length of the footpath crossing the site would be considerably diminished once the site was built upon, whichever direction the path was to take.*

**Density of the proposal in relation to existing developments.**

Bryn Melin receives green but sites 367 and 455 receive amber. Why?

**Access to Site vehicular movement.**

Bryn Melin receives amber and sites 367 and 455 receive amber also. It is clear that vehicular access is worse for Bryn Melin than the other sites and this is another example of bias. It is also clear that highway straightening as stipulated by the council in the original LDP is required

**Access to public transport, pedestrian/cycle routes.**

Bryn Melin receives green but sites 367 and 455 receive amber. Why?

It is clear that Bryn Melin has the worst access to pedestrian, cycle and bus routes and should probably receive a red category. Whereas sites 367 and 455 have access to public transport adjacent and good access to pedestrian and cycle routes

### **Whether the Site appears accessible to all users.**

Bryn Melin does not have a rating for this heading , Why? It should be red because of the slope of the site and poor access. The other sites 367 and 455 are categorised as amber but are definitely more accessible than 370.

### **Opportunities for enhancing green infrastructure/active travel.**

Bryn Melin receives green but sites 367 and 455 receive amber. Why? The independent transport report by Lime transport showed that the site does not meet safety standards and proposed access routes do not meet the Active Travel requirements

### **Placemaking Outcome Summary.**

Bryn Melin 370 is categorised as green.

The report states:

*Development of the site has the potential to enhance the character of the area and contribute positively to national sustainability and placemaking principles. A planning statement has been provided in support of the current planning permission which sets out how the proposal would respond its setting and location in relation to placemaking.*

Clearly this development can't possibly enhance the character of the area when the landscape and a public footpath will be destroyed and local habitats and stepping stones will be affected. This site should receive a red assessment.

Primrose Hill 455 is Amber

*Development of site is likely to have a neutral / negligible effect on local character and sense of place (subject to the development providing mitigation measures and/or meeting specific policy requirements).*

Land South of Llantwit Major Road 367 is red.

*Development of site will likely be detrimental to local character and sense of place*

#### 4.2 Emerging Placemaking Principles for Cowbridge

The **Cowbridge Placemaking Plan** emphasises local identity, sustainable growth, and protection/enhancement of town character, public spaces and the town-edge environment.

Allocating large greenfield land contrary to these principles undermines locally articulated placemaking ambitions. There appears to have been **little or no** involvement of the local council in identifying and discussing the local placemaking criteria and assessment of the various Cowbridge sites.

Recent documents from the developer have indicated that the site is not viable if the council and government policy of social housing and housing density is complied with

### 3. Conclusion & Proposed Changes

For the reasons set out above, this representation requests that the Council **remove Site 370 – Bryn Melin from the RLDP housing allocations** and instead:

1. **Reassess the flawed and biased sustainability assessment** using an independent consultant or the local council.
2. **Assess the viability of the scheme based on developers submissions.**
3. **Consider whether there is a requirement for additional housing** within Cowbridge.
4. **Consider whether the development in Cowbridge complies with Welsh government policy** and TAN 18 of identifying developments within mass transport areas
5. **Retain the site within open countryside**, protected under relevant rural policies.
6. **Focus future growth where environmental and green infrastructure enhancement can be delivered**, supporting the Vale's biodiversity network and placemaking aspirations.
7. **Provide clear evidence** that alternative sites are less appropriate before extending Cowbridge's physical footprint.

## Representation Declaration

We request that this representation be formally recorded as part of the Deposit RLDP consultation (January–March 2026) and considered in both Council decision-making and independent Examination. In accordance with the RLDP consultation procedures, we are prepared to expand on these points if requested during future stages of plan preparation.