

ANNEX 2

SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.

The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060) does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been built out – *"by virtue of an existing adopted plan LDP allocation this is currently under review"*. Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C) – post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024). Accordingly, the site no longer adjoins *"the existing LDP settlement boundary ... by virtue of an existing adopted plan LDP allocation ... currently under review"*. Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that *"The LDP site ... will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location"*. The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The *"future needs of residents in the area"* will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that *"Ystradowen is considered a sustainable settlement for further housing development"* – i.e. *"additional land should be allocated in this location"*.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:

ID	430
Site Name	Land at Ystradowen/Tir yn Ystradowen
Proposed Use	Housing
Developer interest	
Brownfield/Greenfield Land	
Locally Protected Sites (SINCS and Local Nature Reserves)	
Wildlife Corridors, Green Networks or Stepping Stones	
Protected or Priority Species	
Historic environment	
Agricultural Land Quality	
Minerals Resources	
Green Wedge Designations	
Special Landscape Area and Glamorgan Heritage Coast Designations	
Contaminated Land	
Existing Physical Site Constraints	
Topography and Site Conditions	
Tree Preservation Orders, Hedgerows and Woodlands	
Amenity and Compatibility with adjacent uses	
Environmental & Physical Constraints Conclusions	
Access to Services and Facilities	
Access to Retail	
Access to Primary Schools	
Access to Health Services	
Access to other Community Facilities	
Access to Green open Spaces/GI	
Sustainable Transport - Public Transport	
Sustainable Transport - Active Travel	
Access/proximity to services and facilities conclusions	
Community Facilities	
Connectivity and Capacity	
Infrastructure availability conclusions	
Highway Accessibility	
Climate Change	
Placemaking - Character and Place	
Health & Wellbeing	
Suitable for further Consideration	

BP18 Candidate Site Assessment at Preferred Strategy Stage

Settlement	Rural
ID	4060
Site Name	Land at Ystradowen/Tir yn Ystradowen
Proposed Use	Medium Density Housing
Developer interest	
Brownfield/Greenfield Land	
Locally Protected Sites (SINCS and Local Nature Reserves)	
Wildlife Corridors, Green Networks or Stepping Stones	
Protected or Priority Species	
Historic environment	
Agricultural Land Quality	
Minerals Resources	
Green Wedge Designations	
Special Landscape Area and Glamorgan Heritage Coast Designations	
Contaminated Land	
Existing Physical Site Constraints	
Topography and Site Conditions	
Tree Preservation Orders, Hedgerows and Woodlands	
Amenity and Compatibility with adjacent uses	
Environmental & Physical Constraints Conclusions	
Access to Services and Facilities	
Access to Retail	
Access to Primary Schools	
Access to Health Services	
Access to other Community Facilities	
Access to Green open Spaces/GI	
Sustainable Transport - Public Transport	
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Access/proximity to services and facilities conclusions	
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Suitable for further Consideration	

BP18A Candidate Site Assessment at Deposit Plan Stage

As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen'). The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'. Infrastructure Availability is outlined as: *"Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales"* (see below):

Service connection Water and Sewerage	Green	Existing or evidence of suitable connections
	Amber	Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales
	Red	Existing or proposed services are a significant constraint to development viability and/or delivery timescales

The explanation for the scoring provided by the Vale sets out that *"Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme."*

Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a *"small-scale affordable housing led development in a minor rural settlement"*, within *"the ward of Cowbridge"*.

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID:

4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

- In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;
- In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;
- The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and
- The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, *"The settlement (Ystradowen) is also served by public transport"*.

Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The *"primary and secondary school provision with the wider range of services and facilities in Cowbridge"* mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at 'Land at Ystradowen' (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

- The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'; and
- Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-to-day needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer's Reports associated with the applications for the site that directly adjoins

the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:



Key			
	Promoted Site ID 430		Housing Mixed

As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement". Furthermore, the Final Report of app ref. 2023/00948/FUL states:

- "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area"; and
- "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

"The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

'Land at Ystradowen (Site ID: 4060)' is also located within "the ward of Cowbridge". As per the above and outlined by the Authority, there is "a need for 230 additional affordable units over the next 15 years". It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for 'Land at Ystradowen (Site ID: 4060)' which stated "it is not considered that additional land should be allocated in this location". It is clear from the above however that "additional land should be allocated in this location" to satisfy this "need for 230 additional affordable units over the next 15 years" – which 'Land at Ystradowen (Site ID: 4060)' can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.

To briefly reiterate there is a clear overreliance on 'rolled forward' sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can *"make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge"* – which 'Land at Ystradowen (Site ID: 4060)' can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area – see below:



Key	
	SLA

Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)

Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an *"unacceptable harm to the important landscape of the area"*. Accordingly, this development and proposed allocation could therefore cause *"unacceptable harm to the important landscape of the area"*.

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any *"unacceptable harm to the important landscape of the area"*.



Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that *"the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."*

A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes *"unacceptable harm to the important landscape of the area"*, this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the *"need for 230 additional affordable units over the next 15 years"* in *"the ward of Cowbridge"* – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

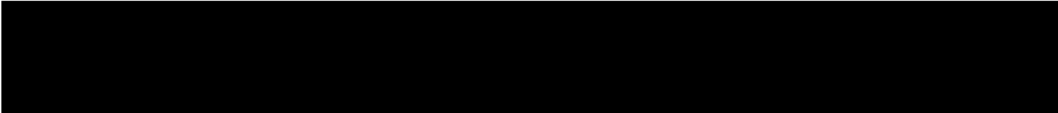
In addition the draft housing trajectory set out that *"there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities"*. There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a *"small scale affordable housing led development"* which is needed to *"respond to local affordable needs and help sustain services and facilities within these rural communities"* is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any *"unacceptable harm to the important landscape of the area"* – the allocation of this site would be more suitable and "safer" – as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where *"there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities"*, are provided for, and the *need for 230 additional affordable units over the next 15 years* in *"the ward of Cowbridge"* would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:

ID	2290
Settlement	Cowbridge
Site Name	Land to the west of Manby Road, Atherlin
Proposed Use	Housing
Developer Interest	
Brownfield/Greenfield Land	
Locally Protected Sites (SINCS and Local Nature Reserves)	
Wildlife Corridors, Green Networks or Stepping Stones	
Protected or Priority Species	
Historic environment	
Agricultural Land Quality	
Minerals Resources	
Green Wedge Designations	
Special Landscape Area and Glanorgan Heritage Coast Designations	
Contaminated Land	
Existing Physical Site Constraints	
Topography and Site Conditions	
Tree Preservation Orders, Hedgerows and Woodlands	
Amenity and Compatibility with adjacent uses	
Environmental & Physical Constraints Conclusions	
Location - Employment and Retail Proposals	
Access to Services and Facilities	
Access to Retail	
Access to Primary Schools	
Access to Health Services	
Access to other Community Facilities	
Access to Green open Spaces/GI	
Sustainable Transport - Public Transport	
Sustainable Transport - Active Travel	
Access/proximity to services and facilities conclusions	
Community Facilities	
Connectivity and Capacity	
Infrastructure availability conclusions	
Other Infrastructure	
Highway Accessibility	
Climate Change	
Placemaking - Character and Place	
Health & Wellbeing	
Suitable for further Consideration	

BP18A Candidate Site Assessment at Deposit Plan Stage



ID	2290					Rural
Settlement	Cowbridge					Ystradowen
Site Name	Land to the west of Maerdy Road, Aberthin					4060 Land at Ystradowen/Tryn Ystradowen
Proposed Use	Housing					Affordable Housing Lod
Developer interest						
Brownfield/Greenfield Land						
Locally Protected Sites (SINCS and Local Nature Reserves)						
Wildlife Corridors, Green Networks or Stepping Stones						
Protected or Priority Species						
Historic environment						
Agricultural Land Quality						
Minerals Resources						
Green Wedge Designations						
Special Landscape Area and Glamorgan Heritage Coast Designations						
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Highway Accessibility						
Climate Change						
Placemaking - Character and Place						
Health & Wellbeing						
Suitable for further Consideration						

BP18A Candidate Site Assessment at Deposit Plan Stage

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

- 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%
- 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appear to have not been assessed – i.e. 7/34 (21%) of the criteria are scored grey. This raises questions regarding the "soundness" of this site, given it appears this site's acceptability and inclusion was pre-determined.

It is clear therefore that if 'Land West of Maendy Road, Aberthin (Site ID: 2299)' has been deemed acceptable for allocation, yet 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than this site, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and be allocated. Not least as the site is *"proposed for a small-scale affordable housing led development in a minor rural settlement ... would accord in principle with the strategy"*, and *"could make an important contribution in meeting a "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge"*.

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to **object** to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

- The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect;
- Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;
- 'Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy *"a need for 230 additional affordable units over the next 15 years"* within *"the ward of Cowbridge"*; and
- 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated;

Ultimately, 'Land at Ystradowen (Site ID: 4060)' is *"proposed for a small-scale affordable housing led development in a minor rural settlement"*, and as such *"would accord in principle with the strategy"*. It would therefore *"make an*

important contribution in meeting “the “need for 230 additional affordable units over the next 15 years” in “the ward of Cowbridge”.

We would therefore **object** the Council’s assessment that the site is not considered suitable for development.