

ANNEX 2

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

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

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, a similar 'scoring' exercise has been undertaken as part of the 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

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.

The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area. Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.

The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."

Conservation Area

In terms of the assertion that *"The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area*, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways

As for the statement that *"Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48"*, this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification

The Detailed Site Assessment also sets out that *"The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable."* This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land

Further to the above, it is also set out that *"There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing"*, however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that *"even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161"*.

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that *"There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing"* is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

ID	435
Site Name	Land South of A48, Bonvilston/Tir de or A48, Bonvilston/Tir de or A48,
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	

Site Assessment at Preferred Strategy Stage

ID	3857
Site Name	Land South of A48, Bonvilston/Tir de or A48, Bonvilston/Tir de or A48,
Proposed Use	Allocatable 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	

Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.

Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

Developer Interest	Green	There is evidence of developer interest in the site proposal, or the site has extant planning permission.
	Amber	There is no developer interest identified at this stage, however there is evidence to indicate that the site is being actively promoted by the owner(s)
	Red	There is no evidence of developer interest.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage, the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

- Cowbridge Comprehensive School;
- St Nicholas Primary School;
- Cowbridge Health Centre; and
- Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.