

Objections to Inclusion of Candidate Site

ID 370 Bryn Melin

In the Preferred Strategy for the VOG RLDP (Stage 2 Site Register)

Ref : brynmelindec23rev5

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Thaw Valley Group

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Management Summary

The site located south of the St Athan road, and described as, *ID370 Bryn-Melin* has been carried forward in to the *Vale of Glamorgan Draft preferred Strategy for the replacement Local Development plan 2021 to 2036* now currently out for consultation, primarily we believe, as it is already part of the *Vale of Glamorgan Local Development Plan 2011-2026*

1. Planning history – The site identified as ID370 Bryn-Melin, no longer resembles the site approved and included in the 2016 LDP. ID370 Bryn-Melin, in this RLDP application, is virtually identical to the land area submitted for planning permission to the Vale of Glamorgan (VoG) three times previously and on each occasion planning permission was refused. It is inconsistent and goes against the VOG site selection standards for it to be included now and furthermore it is a serious omission on behalf of the council to overlook or override this rule.
2. The 2016 LDP planning allocation -The planning application was flawed as the site never met the housing density required for Vale approval. The VoG council also applied constraints such that:
 - a. Realignment of the St Athan was required road to meet safety requirements
 - b. both sites were to be developed together, and no development of the first site was to prevent the second site being developed
 - c. It is inconsistent and contravention to VOG Planning rules for this single field site to be included now and furthermore it is a serious omission on behalf of the council to overlook or override the stringent requirements of the previous allocation.
3. Further allocation at this stage should not be considered as the VoG council planning department, have in their possession documentation from Independent Experts proving this single site cannot be brought up to the standards required due to:
 - a. Road Safety access issues,
 - b. Unsafe pedestrian access
 - c. Adverse landscape impact
 - d. Lack of compliance to Welsh government policies
4. All of the additional proposed sites, 5 in number, within the Cowbridge area were refused at Phase 1, or Phase 2. However, enough of the reasons for excluding those sites also exist to exclude ID370 Bryn-Melin. It should also be noted that the field to the north of the St Athan road which no longer forms part of ID370 Bryn Melin was submitted as part of 2 proposals for inclusion in the Phase 2 and was rejected both times. The selection criteria have not been applied consistently and with sufficient detail to the modified site – relying on the fact that there was a flawed understanding of the initial inclusion in the 2011 to 2026 LDP.
5. Based upon the numerous appeals for the development of the site which have been dismissed, it appears something of an oddity that it was ever allocated for development. However, the allocation was subject to a number of stringent requirements, as stated above, which must not be ignored or deviated from by the developers. It is wrong for any Developer and even worse for the Council to overlook or override these essential requirements in the review of the LDP. The whole is required as an absolute pre-requisite for any inclusion of this site in the Preferred Strategy, Replacement LDP and development, for reasons set out in the Vale of Glamorgan Local Development Plan 2011 – 2026:

6. As more information became available in respect this site, the allocation issue is underlined even more with major concerns about: landscape impact; neighbour impact; highway safety concerns; access limitations; archaeological issues and place-making difficulties all of which run counter to not only the LDP but Welsh Government advice in Planning Policy Wales, Future Wales: The National Plan 2040, associated Technical Advice Notes (TANs) and the Well-Being of Future Generations (Wales) Act 2015.

Objections Summary.

1. The site ID 370 (Bryn Melin) does not meet the criteria for candidate site selection either for stage 1 or stage 2 using *Vale of Glamorgan Replacement Local Development Plan 2021 – 2036 Candidate Site Assessment Methodology June 2022*.
2. The site is not the same as originally proposed in the LDP. The original site proposed significant infrastructure changes including realignment of the St Athan Rd
3. The proposed site has been refused planning permission three times in the past for the same reasons that exist today, notably access, visibility, loss of amenities.
4. The proposed site plans do not meet the housing density threshold of 30 houses per hectare.
5. The proposed site has unsafe access for both cars and pedestrians according to an independent safety audit.
6. The site has a significant visual impact being in a SLA and has some significant features and a scenic footpath running through the middle .It is visible from a wide area around the site.
7. Stage 2 sustainability assessment shows the site has at least three red constraints including, landscape, historic importance and agricultural land. None of these constraints can be easily mitigated.
8. The other sites in the Cowbridge area have been excluded for reasons that equally apply to the Bryn Melin site and therefore this site should also have been excluded

The site ID 370 (Bryn Melin) does not meet the criteria for candidate site selection and the reasons for this will be shown below using the *Vale of Glamorgan Replacement Local Development Plan 2021 – 2036 Candidate Site Assessment Methodology June 2022*

1. Stage 1 Assessment.

As part of the LDP review the Council will require existing LDP site allocations without extant planning permission to be re-appraised through the candidate site assessment process, and the owners of such sites should not presume that they will be automatically carried forward as part of the review

1.1 Site threshold.

It has been assumed in the consultation papers that this site is an existing one which has been assessed and approved previously This is not the case, as can be seen from the two diagrams below

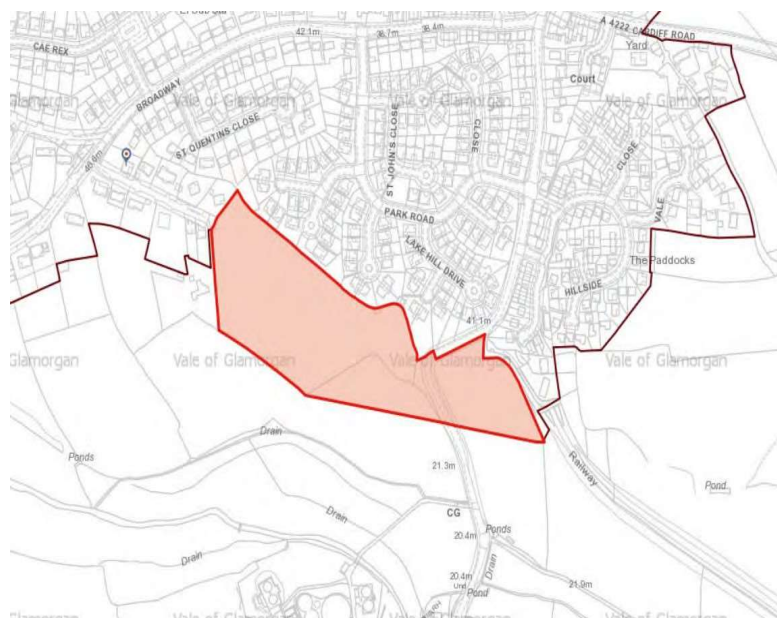


Fig 1 . Original site of 4.3 hectares for 130 houses

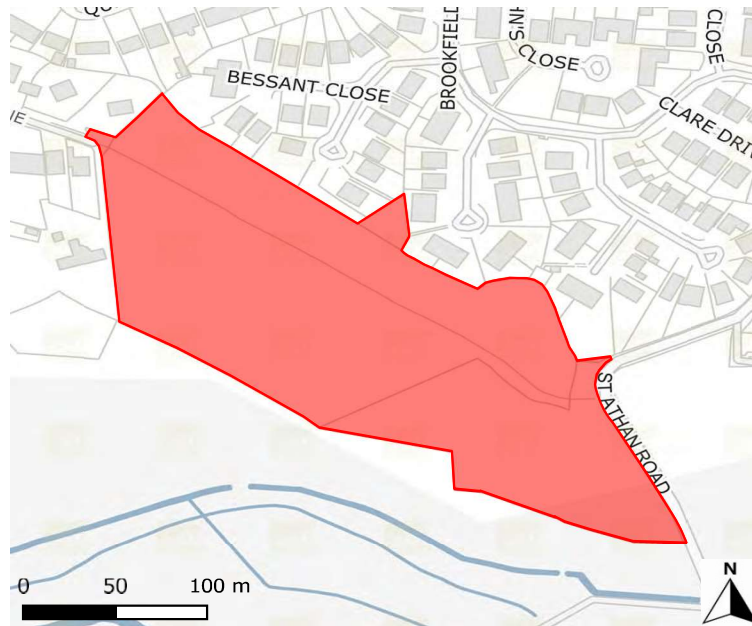


Fig 2 New site Bryn Melin 4.2 hectares for 105 houses

It is clear from the drawings above that the sites are different. The new site is supposed to be 3.8 Ha but additional land has been added to the original proposal whilst some land has been deleted. All of the land to the east of the St Athan Road has been removed and some additional land to the south of the site has been added for an attenuation basin together with a small triangle of land (existing green space on Brookfield Park estate not owned by the promotor/ developer) to the North. The resulting size of the new site is approximately 4.2 Ha. According to the guidelines this should have a density of 30 houses per hectare. i.e 126 house. Only 105 houses have been proposed.

Therefore the site should not pass stage 1 of the selection criteria

It is very unclear why the original site has changed from the original LDP approved site. The developer in submissions to the council claimed that they could not purchase the parcel of land to the east of the road which was fundamental to the candidate site as without it the road could not be realigned. It is not clear how the candidate site passed the viability and feasibility study in the original LDP if the developer / promoter did not own this piece of land. It is also unclear why the council allowed the developer to go ahead with plans for just part of the candidate site. The council insisted in written correspondence to the developer that any plans for the reduced site must not prevent the development of the other part of the site but now the other side of the road which was proposed as a candidate site for the RLDP has been rejected but the Bryn Melin site now minus the land needed to realign the St Athan Rd(as stipulated in the LDP) has been accepted.

1.2 Planning History.

The previous iteration of the site in the current LDP was approved as it didn't have a planning history as it relied on land to the east of the St Athan Rd to make suitable arrangements for Access by realignment of the road stated as follows.

MG2 (19) Land adjoining St. Athan Road, Cowbridge 130

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. Appendices 174 Vale of Glamorgan Local Development Plan 2011 - 2026 : Written Statement Contents The Council's Engineers have advised that a suitable safe access is required that conforms to current design criteria. In addition, future planning applications must be supported by a comprehensive and robust Transport Assessment that evaluates and determines mitigation measures which alleviate any detrimental impact the development will have on the local highway network and associated road junctions. The development will be required to fund and implement highway improvement works in the form of a realignment of St Athan Road

From the candidate assessment guidelines:

- Sites which have previously been refused on the grounds of amenity, highway safety, visual impact etc will be excluded from further consideration. The candidate site process should not be seen as a way for Development proposals to circumvent a previous planning decision which Remains valid.

The Planning Inspector made the following comment in 1973 after the Councils refusal was appealed

Although there is development on two sides of the site part of which appears as skyline development. nevertheless housing on this site would form an appreciable further intrusion into open country spilling downwards into the Thaw Valley, despite the fact that from many points it would be in conjunction with the sewage disposal works.

The council 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/

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.

The Planning Inspector made the following comment in 1980 after the Councils refusal was appealed

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 currently proposed site has been refused planning permission 3 times and we do not see that anything has changed to overturn those decisions.

The site was refused permission amongst other reasons on the basis of access (highway safety) and visual impact.

1.2.1 Highway Safety

Without the required realignment of the St Athan Rd the site access is unsafe. The access is on a downhill slope on a very narrow road which is already dangerous without the access road.

The following photographs show the access from the north and the south.



Photo 1. View of the access road (by chevron sign) from the north



Photo 2. View of the access road from the south

Because of the potential road safety issues of the proposed development an independent stage 1 road safety audit was undertaken by Lime Transport and is shown in Appendix 1.

The Safety Audit concluded that the site accessibility for both pedestrians and cars is unsafe.

Therefore the site should not pass stage 1 of the selection criteria.

1.2.2 Visual Impact.

Appendix from Planning Policy design landscape SPG

part ii policies environment policy env 4 – special landscape areas new development within or closely related to the following special landscape areas will be permitted where it can be demonstrated that it would not adversely effect the landscape character, landscape features or visual amenities of the special landscape area

The area under consideration is in the thaw valley which is designated as an SLA. It is still shown on the drawing 82403/2 (below) in the council's documents on SLA designation.

Extending the town boundary does not remove the land from the valley. The town boundary was only altered to include land in the deposit plan. If the land was not a candidate site then it would still be classified as an SLA and being adjacent to the SLA it is subject to the same restrictions. Within the 2008 SLA supporting document the description of the Lower Thaw Valley highlights its 'dramatic valley form' and says it is a 'relatively uncommon' landscape. This document also points out that the landscape character is already being eroded by suburban development and one of the conclusions regarding the SLA is

Restrict development in widely visible areas and introduce blocks of broadleaf woodland to integrate settlement/Ford related development.

The development site extending southwards over the ridgeline and into the steep sided narrow valley will clearly only exacerbate this situation further. Para 3.2.2 of PPW states that Local Planning Authorities should consider the effect of development upon the conservation of landscape. Development of this site would clearly not achieve this.

The Council's own supporting document states the *features of the Lower Thaw valley are relatively uncommon and are already being eroded by suburban development around Cowbridge.*

These are not replaceable or frequently occurring features and as such it would be unsustainable to develop the site.

The area is particularly attractive when viewed from all areas and in particular approaching from the south. The land includes a rural scenic footpath and is a habitat for many animals. The development will completely ruin the landscape particularly because of the gradient of the site which at some points exceeds 12%.

The site is very visible from a number of areas as identified by a map of the zone of theoretical visibility as shown below

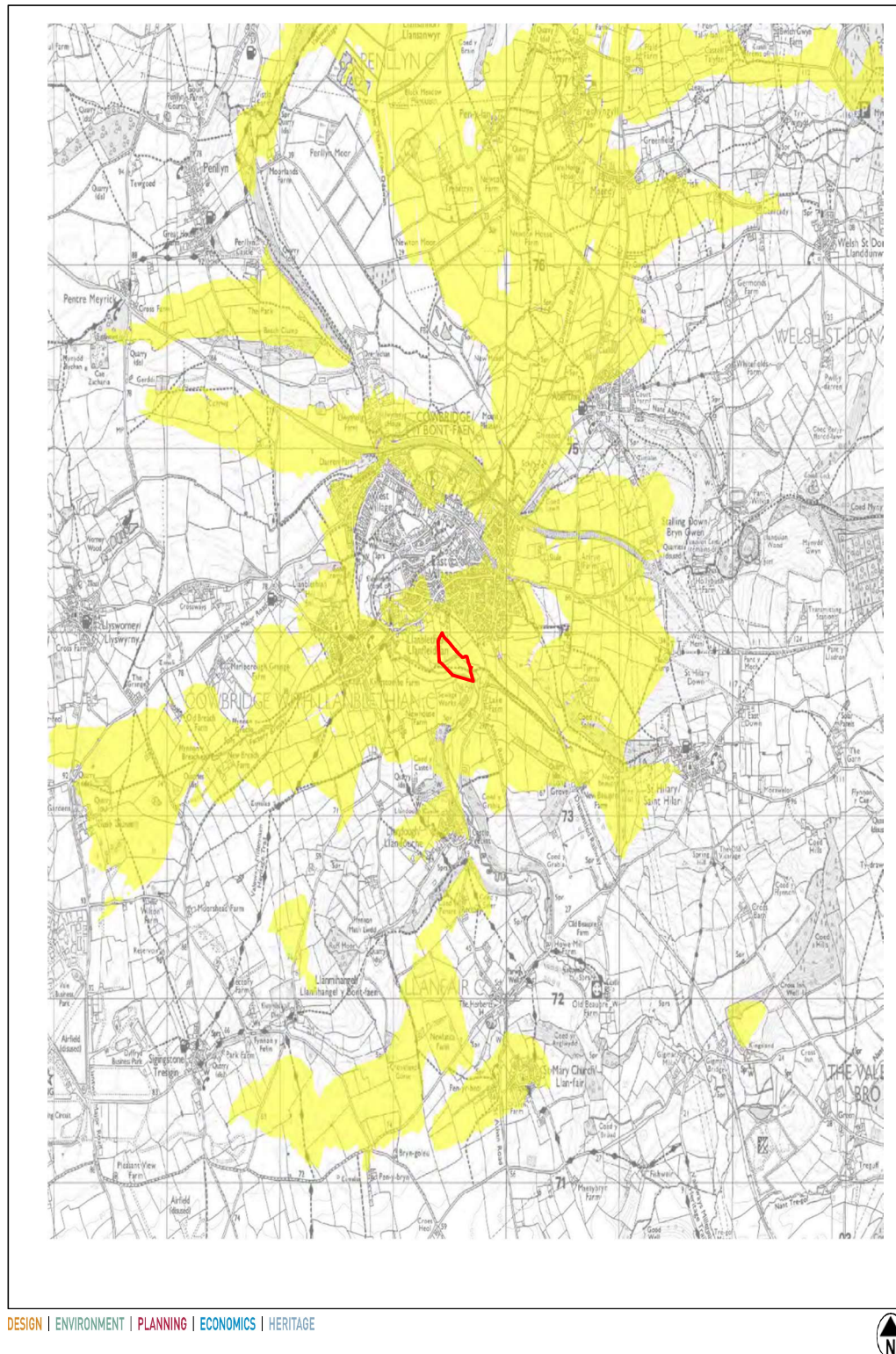


Fig 2 Zone of theoretical Visibility

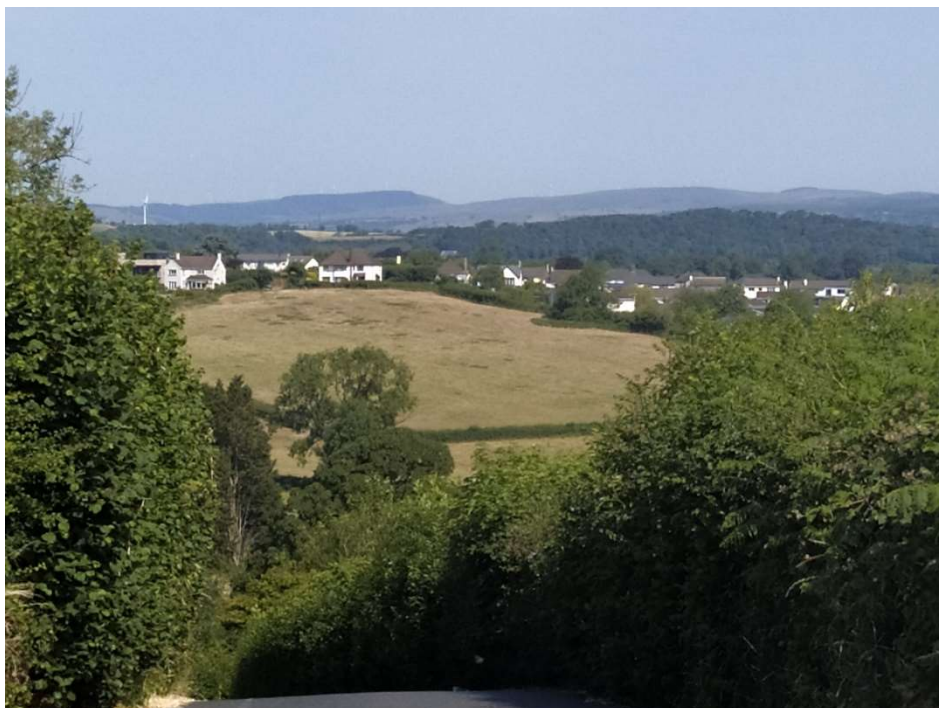


Photo 3. Approach on the St Athan road from the South



Photo 4. View of the Site from Llanblethian from the West



Photo 5. View of the development Site from Windmill lane from the North



Photo 6. View of the development Site(on the scenic public right of way in the middle of the field) from the East

The photos 3 and 4 show how prominent the development will appear. It also shows how the Brookfield Park development is screened and sits down relatively obscured in the landscape.

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*. This development does not meet this policy aim.

Planning Policy for Wales 2021 states:

6.3.4 Where adverse effects on landscape character cannot be avoided, it will be necessary to refuse planning permission

Therefore the site should not pass stage 1 of the selection criteria.

2. Stage 2 Detailed Site Assessment and Sustainability Appraisal.

The following table is taken from the assessment of candidate sites carried out by Aecom on behalf of the Vale of Glamorgan ,Whilst the table doesn’t include a specific reference to the Bryn Melin 370 site , we have presumed it is the site specified land adjoining St Athan Rd. Whilst we are aware that this is a desktop study we have sought to correct some errors in the analysis in table 2

Site ID	Allocation type	Site name	Max no. homes	Economy	Homes	Schools	Health	Leisure	Equality	Transport	Water	SPZ	NVZ	ALC	Minerals	Biodiversity	Historic Env	Landscape	Flood risk	Net Zero
				1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
N/A	Housing	Land adjoining St Athan Road	130	-	++	++	++	-	-	++	-	+	+	++	+	+	--	-	-	?
367	Housing	Land South of Llantwit Major Road	80	-	+	--	+	--	-	+	-	+	+	--	--	--	--	--	-	?
440	Housing	Land North of Church Road	18	-	+	--	--	--	-	-	-	+	+	?	--	?	-	--	+	?
438	Housing	Land to the South of Church Rd	11	-	+	--	--	--	-	-	-	+	+	?	--	?	-	--	+	?
455	Housing	Land North of Primrose Hill	220	+	++	++	++	-	-	++	-	+	+	--	--	?	-	--	+	?
514	Housing	Land East of St.Athan Road.	200	-	++	++	+	-	-	++	-	+	+	--	-	-	-	-	-	?
555	Housing	Land off Vale Court, Cowbridge	80	-	+	++	+	-	-	++	-	+	+	--	--	?	-	--	+	?

Table 1. Sustainability assessment of sites in the Cowbridge Area

				Economy	Homes	Schools	Health	Leisure	Equality	Transport	Water	SPZ	NVZ	ALC	Minerals	Biodiversity	Historic Env	Landscape	Flood risk	Net Zero
Site ID	Allocation type	Site name	Max no. homes	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
N/A	Housing	Land adjoining St Athan Road	105	-	++	++	++	-	-	++	-	+	+	++	+	+	--	-	-	?
367	Housing	Land South of Llantwit Major Road	180	-	+	--	+	--	-	+	-	+	+	--	--	--	--	--	-	?
440	Housing	Land North of Church Road	18	-	+	--	--	--	-	-	-	+	+	?	--	?	-	--	+	?
438	Housing	Land to the South of Church Rd	11	-	+	--	--	--	-	-	-	+	+	?	--	?	-	--	+	?
455	Housing	Land North of Primrose Hill	220	+	++	++	++	-	-	++	-	+	+	--	--	?	-	--	+	?
514	Housing	Land East of St.Athan Road.	200	-	++	++	+	-	-	++	-	+	+	--	-	-	-	-	-	?
555	Housing	Land off Vale Court, Cowbridge	80	-	+	++	+	-	-	++	-	+	+	--	--	?	-	--	+	?

Table 2. Amended Sustainability assessment of sites in the Cowbridge Area

We have changed 11 ALC to red for the Bryn Melin site as it contains at least grade 3a land and is similar to site ID 367.

An ALC survey (VOG agricultural land assessment 2015) stated that the land was grade 2 (western third) and 3 which is considered valuable land. The recent landmap survey below shows the site to be 3a and 3b land/ The land to the north of the site is shown in dark green (3a) and the south of the site(pale green) 3b

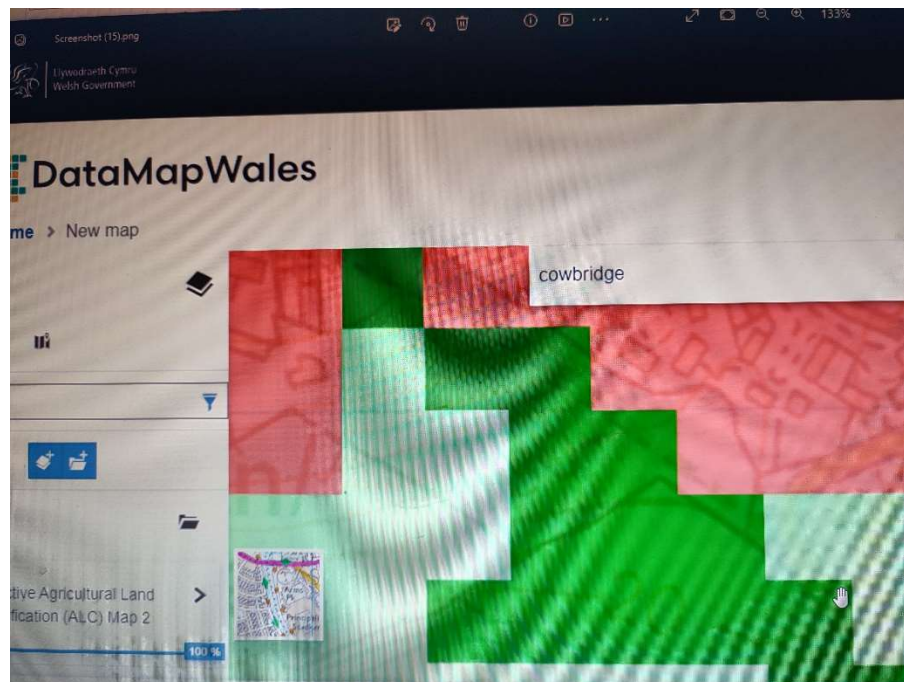


Photo 7. Landmap for Wales showing half of the land is grade 3a

Wales Planning Policy 2021 states:

3.58 Agricultural land of grades 1, 2 and 3a of the Agricultural Land Classification system (ALC)16 is the best and most versatile, and should be conserved as a finite resource for the future.

3.59 When considering the search sequence and in development plan policies and development management decisions, considerable weight should be given to protecting such land from development, because of its special importance.

Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations. If land in grades 1,2 or 3a does need to be developed, and there is a choice between sites of different grades, development should be directed to land of the lowest grade.

We have changed the landscape assessment 15 (for Bryn Melin) to red as this is in a SLA similar to site 367. See section 1.2.2 above

With regard to mineral safeguarding (12) for the land Bryn Melin as well as sites 367 and 455. They are only in a safeguarding area because of where the town boundary has been drawn. The whole of the Cowbridge area lies above sand and limestone. Limestone and sand cannot be exploited in these areas because it requires a 200 m buffer zone which is not possible at any of these locations.

2.1 Candidate Site Conclusions

Sites with insurmountable constraints will be excluded from further consideration and those that perform poorly against the ISA framework will be excluded from further consideration. This phased approach is intended to filter out any non-deliverable or inappropriate sites so that statutory consultees are only commenting on sites that have a reasonable chance of being allocated in the RLDP and ultimately being delivered.

In broad terms, if a site scores red against a criterion it is considered that development is affected by either a major constraint that cannot be overcome through mitigation measures such as flood risk, constraints that question the deliverability of the site or where a site is contrary to national planning such as isolated developments in the open countryside. Sites which are found to result in a red/negative outcome, (including a single red score) could be rejected on this basis depending on the nature of the constraint identified.

The Bryn Melin site has a least 3 red scores. This excludes the other most obvious constraint of access and road and pedestrian safety. We do not believe that these constraints can be mitigated.

The following are the summary conclusions for the Cowbridge sites from the document *BPI84 candidate sites stage 2 assessment register*.

Site ID 367

Conclusion at Preferred Strategy Stage / Casgliad ar gam y strategaeth a ffefrir:

Development would have a negative impact of on the setting of the Schedule Ancient Monument and potential significant loss of protected trees. / Byddai'r datblygiad yn cael effaith negyddol ar leoliad Heneb Gofrestredig ac o bosib yn peri colled coed gwarchodedig sylweddol

Site ID 438

Conclusion at Preferred Strategy Stage / Casgliad ar gam y strategaeth a ffefrir:

The site would represent unacceptable intrusion in to the open countryside. The site is located on the outskirts of Cowbridge and not conveniently situated for walking cycling and public transport accessibility. / Byddai'r safle'n cynrychioli ymyrraeth annerbyniol i gefn gwlad agored. Mae'r safle wedi'i leoli ar gyrion y Bont-faen ac nid yw mewn lleoliad cyfleus i feicio na cherdded nac o ran hygyrchedd trafnidiaeth gyhoeddus.

Site ID 440

Conclusion at Preferred Strategy Stage / Casgliad ar gam y strategaeth a ffefrir:

The site would represent unacceptable intrusion in to the open countryside. The proposal would have an adverse impact on the setting of a nearby ancient schedule monument. / Byddai'r safle'n cynrychioli ymyrraeth annerbyniol i gefn gwlad agored. Byddai'r cynnig yn cael effaith andwyol ar leoliad heneb gofrestredig gerllaw.

Site ID 455

Conclusion at Preferred Strategy Stage / Casgliad ar gam y strategaeth a ffefrir:

The site would represent unacceptable intrusion in to the open countryside. Development is likely to result in a substantial change in character and/or significant adverse effects on landscape character and visual amenity. / Byddai'r safle'n cynrychioli ymyrraeth annerbyniol i gefn gwlad agored. Mae datblygu safle ar y raddfa hon yn debygol o arwain at newid sylweddol o ran cymeriad a/neu gael effaith andwyol sylweddol ar gymeriad ac amwynder gweledol y dirwedd.

Site ID 475

Conclusion at Preferred Strategy Stage / Casgliad ar gam y strategaeth a ffefrir:

No initial Development Viability Model submitted – site viability and deliverability unknown. / Dim Model Hyfywedd Datblygiad cychwynnol wedi'i gyflwynol – hyfywedd safle a chyflawnadwyedd yn anhysbys

Site ID 514

Conclusion at Preferred Strategy Stage / Casgliad ar gam y strategaeth a ffefrir:

The development of this site would be an arbitrary incursion into the countryside in this location. Development will significantly affect stepping stones, green networks, or wildlife corridors. / Datblygu cefn gwlad mewn ffordd fympwyol fyddai datblygu'r lleoliad hwn. Bydd y datblygiad yn effeithio'n sylweddol ar gerrig camu, rhwydweithiau gwyrdd neu goridorau bywyd gwyllt.

Site ID 555

Conclusion at Preferred Strategy Stage / Casgliad ar gam y strategaeth a ffefrir:

The development of this site would be an arbitrary incursion into the

*countryside in this location. / Datblygu cefn gwlad mewn ffordd fympwyol
fyddai datblygu'r lleoliad hwn*

Site ID 370 Bryn Melin

*Conclusion at Preferred Strategy Stage / Casgliad ar gam y strategaeth a
ffefrir:*

*The site is allocated in the adopted LDP and is considered suitable to be
'rolled forward' as an RLDP housing allocation as it is considered to be
deliverable and accords with the Strategy. The site is subject to a planning
application. / Mae'r safle hwn wedi'i ddyrannu yn y CDLl mabwysiedig ac
mae'n cael ei ystyried yn addas i gael ei ddyrannu eto yn y CDLlN oherwydd
ei fod yn cael ei ystyried yn un cyraeddadwy ac yn un sy'n cyd-fynd â'r
strategaeth. Mae'r safle yn destun cais cynllunio*

2.2 Comments on Site 370 Bryn Melin

The site as it stands is not allocated in the adopted LDP for reasons stated in section 1.1.
It does not meet the criteria for candidate sites at stage 1 assessment.
It does not meet the criteria for candidate sites at stage 2 assessment

The comments in the summary conclusions for rejecting site 455 equally apply to this site:
*The site would represent unacceptable intrusion in to the open countryside. Development is likely to
result in a substantial change in character and/or significant adverse effects on landscape character
and visual amenity. /*

The comments for rejecting site 514 equally apply to this site:
*The development of this site would be an arbitrary incursion into the countryside in this location.
Development will significantly affect stepping
stones, green networks, or wildlife corridors.*

The comments for rejecting site 555 equally apply to this site:
The site would represent unacceptable intrusion in to the open countryside.

Therefore the site should be rejected for the same reasons as these other sites.

**Other candidate sites in the Cowbridge area have much better and safer access for both road
and pedestrians and closer links to public transport. They do not impact on a significant
archaeological site. They also have a similar or less impact on the visual landscape.**

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APPENDIX 1

Bryn Melin

Development , St Athan
Road, Cowbridge



Road Safety Audit- Stage 1

NOVEMBER
2022

Table ID Project Details

Report title Bryn Melin Development, St Athan Road,

Cowbridge Date 23 November 2022

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22106d

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1 Introduction

1.1 Background

- 1.1.1 This report has been prepared by Lime Transport and sets out the results of a Stage 1 Road Safety Audit, requested by Thaw Valley Group, of the pedestrian, cycle and vehicle access proposed as part of a residential development of up to 105 dwellings on land to the east of Windmill Lane, Cowbridge. This report also reviews the potential access to land to the south and east of St Athan Road, which is included on the drawings provided.
- 1.1.2 A Road Safety Audit Brief was Issued by Thaw Valley Group, and this has been accepted by the Audit Team (refer to Appendix 1).
- 1.1.3 The Audit Team comprised:
- A Roberts BEng (Hons) MCIHT MSORSA FFB
 - L Clark BSc (Hons) MSc MSORSA
- 1.1.4 No members of the Audit Team were involved in either the preliminary or detailed design of the scheme, and there were no additional members who attended the site visit or undertook a concurrent audit.
- 1.1.5 The audit took place on site on Tuesday 8th November 2022, when the weather was fine but the road surface was damp, and also by examination of the plans and drawings (as listed in Appendix 2).
- 1.1.6 The terms of reference of the audit are as described in GG119, and this Safety Audit examines the safety implications of the proposed scheme. It presents observations and recommendations only where there are identified deficiencies in the safety of the scheme. This Audit report does not verify compliance of the scheme with any other standard or criteria.
- 1.1.7 The problems identified in this Audit Report include the scope identified on the Key Plan attached in Appendix 3. It does not identify problems within the wider highway network.
- 1.1.8 The following additional documents were supplied to the Audit Team:
- Land West of Windmill Lane (Bryn Melin), Cowbridge – Transport Assessment (August 2022)
- 1.1.9 There were no departures from standards reported to the Audit Team.

2 Items raised at this Stage 1 RSA

2.1 Local alignment

Visibility

2.1.1 Summary Forward visibility along St Athan Road towards vehicles waiting to turn right into the proposed access is restricted by the horizontal and vertical alignment, which increases the potential for rear-end shunt type collisions.

Location Proposed access on to St Athan Road

It was noted from the site visit that forward visibility along St Athan Road (for vehicles travelling southbound) towards vehicles waiting to turn right into the proposed access is restricted by the horizontal and vertical alignment of the road as well as existing, mature vegetation and embankment on land to the east/south of St Athan Road which is owned by a third party. Insufficient forward visibility along St Athan Road increases the potential for rear-end shunt type collisions, or for drivers to take avoiding action.

The Transport Assessment produced in support of the proposed development indicates that the proposed access 'would be accompanied by a TRO implementing a 30mph speed limit prior to the junction on either side of St Athan Road'. However, any proposed TRO would need to be subject to public consultation and would also need to satisfy the criteria/guidelines set out in DfT Circular 01/2013. Therefore, there is no guarantee that the existing 30mph speed could be extended along St Athan Road, and therefore any visibility at the junction or on the approach to the junction should be determined based on the 85th percentile speed of vehicles currently using St Athan Road (i.e. 33.6mph southbound and 35.2mph northbound).

Recommendation

It is recommended that the layout/design of the access is amended to ensure the required visibility splays (based on the 85th percentile speed of vehicles along St Athan Road) can be achieved.



2.1.2 Summary Forward visibility along St Athan Road towards vehicles waiting to turn right into the proposed access is restricted by the horizontal and vertical alignment, which increases the potential for rear-end shunt type collisions.

Location Potential access to land to the south and east of St Athan Road

It was noted from the site visit that forward visibility along St Athan Road (for vehicles travelling in either direction) towards vehicles waiting to turn right into the potential access is restricted by the horizontal and vertical alignment of the road as well as existing, mature vegetation and embankment on land to the east/south of St Athan Road which is owned by a third party. Insufficient forward visibility along St Athan Road increases the potential for rear-end shunt type collisions, or for drivers to take avoiding action.

Recommendation

It is recommended that the layout/design of the access is amended to ensure the required visibility splays (based on the 85th percentile speed of vehicles along St Athan Road) can be achieved.



2.1.3 Summary Forward visibility along St Athan Road for vehicles waiting to turn right into the potential access is restricted by the horizontal and vertical alignment of St Athan Road, which increases the potential for head-on collisions, or for approaching drivers to take avoiding action.

Location Potential access to land to the south and east of St Athan Road

It was noted from the site visit that forward visibility along St Athan Road for vehicles turning right into the potential access is restricted by the horizontal and vertical alignment of the road as well as existing, mature vegetation and embankment on land to the north and west of St Athan Road which is in third party ownership. Insufficient forward visibility along St Athan Road increases the potential for vehicles to turn right into the potential access when it is unsafe to do so, and increases the potential for head-on collisions, or for drivers to take avoiding action.

Recommendation

It is recommended that the layout/design of the access is amended to ensure the required visibility splays (based on the 85th percentile speed of vehicles along St Athan Road) can be achieved.



New/existing road interface

2.1.4

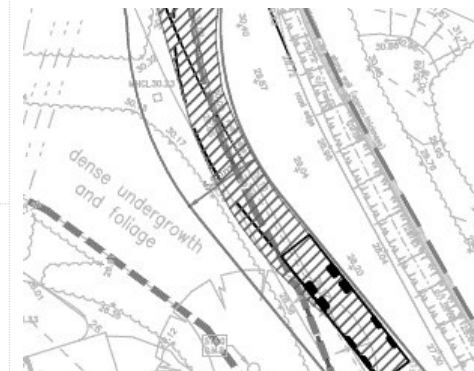
Summary Swept-path analysis of a large (refuse) vehicle shows the body of the vehicle over-sweeping the centreline of St Athan Road, at a point where the realigned carriageway reverts to the existing alignment and encroaches into the opposing lane. This could lead to head on or side-swipe type collisions, or for drivers to take avoiding action.

Location Approximately 30m south of the proposed access on to St Athan Road

It is noted from the plans provided that the body of the vehicle over-sweeping the centreline of St Athan Road, at a point where the realigned carriageway reverts to the existing alignment and encroaches into the opposing lane. This increases the potential for head-on or side-swipe type collisions, or for drivers to take avoiding action, increasing the potential for vehicles to mount the pavement [which is not shown on the swept-path diagram, but included on the site layout plan) and conflict with pedestrians.

Recommendation

It is recommended that the layout of the interface between the new and existing carriageway is re-designed to ensure large vehicles do not encroach into the opposing lane.



Drainage

2.1.5 Summary Lack of surface water drainage along this section of St Athan Road, which could result in a significant amount of surface water run-off, and surface water ponding which, during freezing weather, can turn to ice. This could lead to drivers losing control of their vehicle on the bend or on the approach to the give-way markings, increasing the potential for vehicles to overshoot the give-way markings and enter the carriageway injudiciously.

Location St Athan Road on the approach to the proposed side road junction

It was noted from the site visit that there is no highway drainage along this section of St Athan Road. A lack of surface water drainage could result in a significant amount of surface water run-off entering the side road, and the potential for surface water ponding. During freezing weather, this surface water could turn to ice, and could lead to drivers losing control of their vehicle on the bend, conflicting with other vehicles, or on the approach to the give-way markings, increasing the potential for vehicles to overshoot the give-way markings and enter the carriageway injudiciously.

Recommendation

It is recommended that surface water drainage is reviewed at the detailed design stage, and that appropriate surface water drainage is provided.



Fences and road restraint systems

2.1.6 Summary It is unclear from the plans provided whether the newly installed road restraint system (RSS) is to be retained within the amended access. The lack of a suitable RSS could result in vehicles leaving the carriageway at the bend and entering the front garden of the proposed plot no. 1, and potentially conflicting with vehicles parked in the driveway.

Location Western side of St Athan Road, adjacent to the proposed junction.

It is unclear from the plans provided whether the newly installed road restraint system (RSS), which has been installed to prevent errant vehicles running off into the adjacent field, is to be retained. The lack of a suitable RSS could result in errant vehicles colliding with the recently installed chevron warning signs (sign diag. 515) or leaving the carriageway at the bend and:

- a. Entering the side road, on the wrong side of the carriageway - conflicting with vehicles exiting the site, resulting in a head-on collision;
- b. Mounting the pavement on the northern edge of the side road – conflicting with pedestrians on the footway; or,
- c. Travelling down the embankment and entering the front garden of the proposed dwelling (plot no. 1), and potentially conflicting with vehicles parked in the driveway.

Recommendation

It is recommended that the road restraint system is retained/incorporated within the amended access, or the chevron signs are erected on passively safe sign posts.



2.2 Junctions

Layout

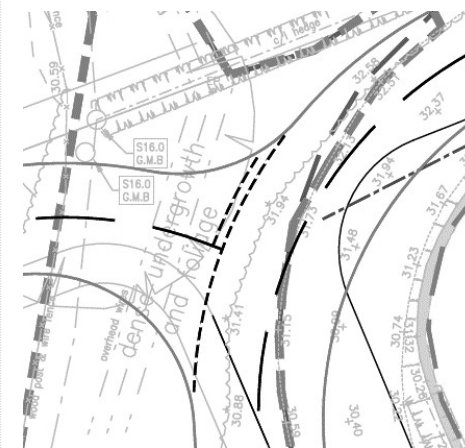
2.2.1 **Summary** It is unclear from the plans provided whether there is sufficient space for a large vehicle, travelling northbound along St Athan Road, to pass another vehicle waiting to turn right into the proposed development. Insufficient width could lead to side-swipe type collisions.

Location Realigned St Athan Road at the proposed junction on to Roman Road

In the absence of any specific details, it is difficult to determine whether there is sufficient width to accommodate a large vehicle (travelling northbound along St Athan Road) passing another vehicle (possibly large vehicle) waiting to turn right into the proposed development from St Athan Road. Insufficient width increases the potential for side-swipe type collisions.

Recommendation

It is recommended that additional swept-path analysis of the range of vehicles using St Athan Road and likely to use the new access is undertaken to determine whether there is sufficient room, and that the junction/access is amended accordingly.



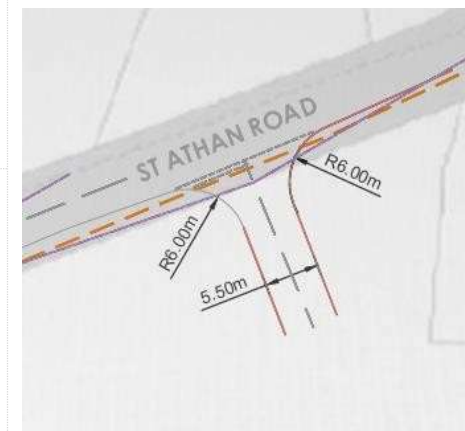
2.2.2 **Summary** The width of St Athan Road at the potential access measures approximately 4.5m wide, which is insufficient for a large vehicle, travelling southbound along St Athan Road, to pass another vehicle waiting to turn right into the proposed development. Insufficient width could lead to side-swipe type collisions.

Location Potential access to land to the south and east of St Athan Road

It was noted from the site visit that St Athan Road, at the potential access, measures approximately 4.5m wide. This is insufficient for a large vehicle, travelling southbound along St Athan Road, to pass another vehicle waiting to turn right into the proposed development. Insufficient width could lead to side-swipe type collisions.

Recommendation

It is recommended that the width of St Athan Road at this location is widened to a minimum of 5.5m, to allow large vehicles to pass other vehicles waiting to turn right into the site.



2.2.3 Summary Swept-path analysis of a large (refuse) vehicle shows the body of the vehicle over-sweeps the centreline of St Athan Road and encroaches into the opposing lane. This could lead to head-on or side-swipe type collisions. Location Proposed access on to St Athan Road	
It is noted from the plans provided that the body of a large (refuse) vehicle over-sweeps the centreline of St Athan Road and encroaches into the opposing lane when turning left out of the proposed development. This increases the potential for head-on or side-swipe type collisions. Recommendation It is recommended that the layout/design of the junction is amended to ensure a large vehicle can egress the site safely without crossing the centreline of St Athan Road	
2.2.4 Summary Swept-path analysis of a large (refuse) vehicle shows the body of the vehicle over-sweeps the centreline of St Athan Road and encroaches into the opposing lane. This could lead to head-on or side-swipe type collisions. Location Proposed junction onto St Athan Road.	
It is noted from the plans provided that the body of a large (refuse) vehicle over-sweeps the centreline of St Athan Road and encroaches into the opposing lane when turning into the site from both directions on St Athan Road. This increases the potential for head-on or side-swipe type collisions. Recommendation It is recommended that the layout/design of the junction is amended to ensure a large vehicle can access the site safely without crossing the centreline of St Athan Road.	

2.3 Walking, cycling and horse-riding

2.3.1 Summary The proposed pedestrian and cycle accesses to the site from both Llanquian Close and Bessant Close are of sub-standard width (approximately 1.2m wide), have high walls/fences on both sides of the path, which reduce the effective width of the footpath, and are unlit. This increases the potential for conflict between pedestrians and cyclists travelling along the paths.

Location Footpath links to both Llanquian Close and Bessant Close

It was noted from the site visit, and from the plans provided that the main pedestrian/cycle accesses to the north of the site will be provided from existing, substandard footpath links to both Llanquian Close and Bessant Close. These footpath links measure approximately 1.2m in width and have high walls/fences on both sides of the footpaths, which further reduce the effective width of the footpath. These footpaths are not, therefore, wide enough for a pedestrian using a wheelchair of those with a double-buggy and could lead to conflict between pedestrians and cyclists. This is further exacerbated by the reduced forward visibility on the path leading to Bessant Close.

Recommendation

It is recommended that a more suitable pedestrian/cycle access to the site is provided, that removes the conflict between pedestrians and cyclists.



2.3.2 Summary Gradient of the proposed pedestrian route to Windmill Lane is too steep (and over too long a distance) for pedestrians with any physical difficulties. It also presents difficulties for pedestrians with a pushchair or those using a wheelchair or ride-on toy. This could result in pedestrian losing control of the pushchair or wheelchair, increasing the potential for the pushchair or wheelchair to topple or for an errant pushchair, wheelchair or ride-on toy to conflict with cars manoeuvring on the proposed shared-surface.

Location Western end of the proposed development on the approach to Windmill Lane

It is noted from the plans provided that the gradient of the pedestrian route to Windmill Lane is too steep (and over too long a distance) for pedestrians with any physical difficulties. It also presents difficulties for pedestrians with a pushchair or those using a wheelchair or ride-on toy. This could result in a pedestrian losing control of a pushchair or wheelchair, increasing the potential for the pushchair or wheelchair to topple or for an errant pushchair, wheelchair or ride-on toy to conflict with cars manoeuvring along the proposed shared-surface or reversing from individual driveways. This increases the potential for pedestrians to be hit manoeuvring vehicles.

Recommendation

It is recommended that an alternative route to local facilities is provided, and that the route is suitable for pedestrians with any physical difficulties and those with a pushchair or those using a wheelchair.



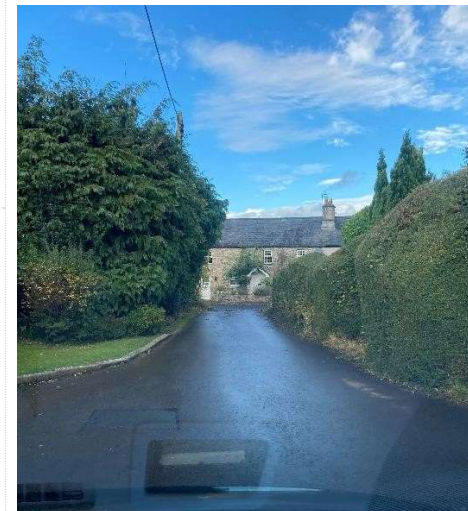
2.3.3 Summary The proposed pedestrian/cycle link to the site from Windmill Lane is of substandard width, particularly on the approach to Broadway, where there is insufficient width for a car to pass a pedestrian, particularly a pedestrian with a pushchair or those using a wheelchair, increasing the potential for pedestrians to be hit by passing vehicles.

Location Windmill Lane, on the approach to Broadway.

It is noted from the plans provided that it is proposed to provide a pedestrian and cycle access to the site from Windmill Lane, which is a shared-surface road serving approximately 12 dwellings. However, it was noted from the site visit that the width of Windmill Lane reduces on the approach to Broadway and there is insufficient width for a car to pass a pedestrian (particularly a pedestrian with a pushchair or those using a wheelchair) or a cyclist. This increases the potential for pedestrians to be hit by passing vehicles. This is exacerbated by the limited visibility from Broadway (w) to Windmill Lane.

Recommendation

It is recommended that a more suitable pedestrian/cycle access to the site is provided, that removes the conflict between pedestrians and cyclists.



Audit Team statement

We certify that this road safety audit has been carried out in accordance with GG 119.

Audit Team leader

Name: Andy Roberts BEng (Hons) MCIHT
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Organisation: Lime Transport
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Penarth, CF64 2AA

Signed: 

Date: 17th November 2022

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Audit Team member

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Planner
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2AA

Signed: 

Date: 17th November 2022

Tel:
e-mail: 029 2070 0924
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Appendix 1

RSA Brief

Table 3.1 Project Summary												
Date:	10 th November 2022											
Document reference:	22106 d1											
Prepared by:	Thaw Valley Group											
On behalf of:												
Authorisation sheet												
Project:	Bryn Melin Development, St Athan Road, Cowbridge											
Report title:	Road Safety Audit Stage 1											
Prepared by:												
Name:	Michael Carney											
Signed:												
Organisation:	Thaw Valley Group											
Date:	10 th November 2022											
I APPROVE THE RSA BRIEF AND INSTRUCT THE RSA TO TAKE PLACE ON BEHALF OF THE OVERSEEING ORGANISATION:												
Name:												
Signed:												
Organisation:												
Date:												
Table 3.2 General Details												
General Details												
Highway scheme name and road name:					Bryn Melin Development, St Athan Road, Cowbridge							
Type of scheme:					Stage 1 Road Safety Audit of the pedestrian, cycle and vehicle access proposed as part of a residential development of 103 dwellings on land to the east of Windmill Lane.							
RSA stage (tick as appropriate)					1	✓	2		3		4	
					Stage 1							
Overseeing organisation details					Design organisation details							
Vale of Glamorgan					Vectos Ground Floor, Helmont House Churchill Way CARDIFF CF10 2HE 029 2072 0860							
Police contact details					Maintaining agent contact details							
NA					NA							
RSA team membership												
Andy Roberts Beng (hons) MCIHT MSoRSA FFB - Lime Transport Lizzie Clark BSc (hons) MSc MSoRSA- Lime Transport												
Terms of Reference												
The terms of reference of this Audit are DMRB Volume 5, Section 2: GG 119												

Table 3.3 Scheme details
Scheme description/objective
General
Stage 1 Road Safety Audit of the pedestrian, cycle and vehicle access proposed as part of a residential development of 103 dwellings on land to the east of Windmill Lane.
Design standards applied to the scheme design
Design Manual for Roads and Bridges, and Manual for Streets
Design speeds
100kph (along St Athan Road)
Speed limits
60mph (along St Athan Road)
Existing traffic flows /queues
ATC survey results summarised in the Transport Assessment
Forecast traffic flows
As part of the Transport Assessment
Pedestrian, cyclist and equestrian desire lines
None identified
Environmental constraints
None identified
Table 3.4 Locality
Description of locality
As part of the Transport Assessment
General description
Stage 1 Road Safety Audit of the pedestrian, cycle and vehicle access proposed as part of a residential development of 103 dwellings on land to the east of Windmill Lane.
Relevant factors which may affect road safety
Concern has been raised regarding the access for pedestrians and cyclists, as well as the suitability of both the proposed access to the site on to St Athan Road and the potential access to land to the south and east of St Athan Road.

Table 3.5 Analysis			
Collision data analysis			
As part of the Transport Assessment			
Departures from standards			
None reported			
Previous road safety audit stage reports, road safety audit response reports and evidence of agreed actions			
n/a			
Strategic decisions			
None identified			
List of included documents and drawings			
Documents			
Drawings			
WIND -15-04-SK27	Site off Windmill Lane, Cowbridge - Sketch scheme		
195148_AT_C01 rev A	Land West of Windmill Lane, Cowbridge - 11.3 m refuse vehicle swept-path analysis servicing		
195148_AT_C02 rev A	Land West of Windmill Lane, Cowbridge - Fire Tender swept-path analysis servicing		
195148_A04 rev C	Land West of Windmill Lane, Cowbridge - Proposed site access - Option 4		
195148_AT_A02 rev C	Land West of Windmill Lane, Cowbridge - 11.3 m refuse vehicle swept-path analysis St Athan Road junction		
Table 3.6 Checklist			
Tick all that are included and provide reasons for those that are not included			
Site location plan	✓	Scale layout plans	✓
Departures and relaxations from standards	n/a	Construction/typical details	n/a
Previous RSA reports	✗	Previous RSA response reports and	n/a
Collision data and collision data analysis	✓	Road traffic collision plot	✓
Traffic signal staging	n/a	Traffic counts	✓
Speed surveys	✓	Pedestrian, cyclist and horse riding desire lines and volumes	✗
Walking, Cycling and Horse Riding assessment and reviews	✗	Items outside the scope of the RSA/Strategic decisions	n/a
Other factors that may affect impact on road safety	✗	Design speeds/speed limits	✓
Design standards used	✓	Adjacent land uses	✗

Appendix 2 Drawings supplied with Audit brief

Ref no.	Title	Author
WIND-15-04-SK27	Site off Windmill Lane, Cowbridge – Sketch Scheme	Think Urban
195148_AT_C01 rev A	Land West of Windmill Lane, Cowbridge – 11.3m refuse vehicle swept-path analysis servicing	Vectos
195148_AT_C02 rev A	Land West of Windmill Lane, Cowbridge – Fire tender swept-path analysis servicing	Vectos
195148_A04 rev C	Land West of Windmill Lane, Cowbridge – Proposed site access – Option 4	Vectos
195148_AT_A02 rev C	Land West of Windmill Lane, Cowbridge – 11.3m refuse vehicle swept-path analysis St Athan Road junction	Vectos

Appendix 3 Key plan

