
Island Farm, Bridgend

**Candidate Site Assessment Stage 2
Supporting Statement**

Replacement Bridgend Local Development Plan 2018 to 2033

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Contents

1.	Introduction	1
2.	Site Overview	3
3.	Proposed Development	8
4.	Environmental Considerations	13
5.	Technical Considerations	16
6.	Sustainability and Wellbeing	19
7.	Deliverability and Viability	21
8.	Conclusions	22
	Appendix 1 - Proposed Masterplan Document	23
	Appendix 2 - Renewable Energy Strategy	24
	Appendix 3 - Utilities Strategy	25
	Appendix 4 - Ecology Appraisal	26
	Appendix 5 – Landscape Matters Note	27
	Appendix 6 – ALC Supplementary Note	28
	Appendix 7 – Summary of Site Investigations	29
	Appendix 8 - Transport Strategic Appraisal	30
	Appendix 9 - Drainage Strategy	31
	Appendix 10 – Health Impact Assessment	32

1. Introduction

- 1.1. This Statement has been prepared by Savills on behalf of HD Ltd in response to Bridgend County Borough Council's (BCBC) letter dated 17th December 2019 and a further letter received from BCBC on 13th May with regard to the Candidate Site Assessment Stage 2 as part of the preparation of the Replacement Local Development Plan (LDP). It also follows useful and positive engagement between BCBC and HD Limited (and its Project Team) in relation to the LDP process.
- 1.2. With the Stage 1 Call for Sites having taken place in November 2018, the December 2019 BCBC letter related to those sites that are to progress to Stage 2 of the Candidate Site Assessment process and requested the submission of additional technical documentation focussed on specific characteristics of sites to demonstrate their suitability for allocation and that they can be successfully delivered.
- 1.3. The further letter, dated 13th May 2020, made a request for additional information and the clarification of matters that were provided by HD Ltd in response to the December 2019 letter. As such, this version of Stage 2 Supporting Statement is an update to an earlier version submitted in April 2020 and relates only to land at Island Farm. A separate report is provided with regard to land at Craig-y-Parcau.
- 1.4. It is noted that Welsh Government Guidance in its Development Plans Manual Edition 3 (March 2020) makes it clear that the LPA must use the candidate site process to gather suitable evidence to robustly demonstrate the deliverability and financial viability of sites. This report collates this evidence to demonstrate that, land at Island Farm is deliverable and financially viable in order to be considered in the deposit LDP.
- 1.5. HD Ltd support the approach taken in the Preferred Strategy (October 2019) of identifying Island Farm as a potential strategic mixed-use development for Bridgend. HD Ltd's land forms a logical extension to the settlement of Bridgend, is without constraints that would preclude development (and that cannot be either mitigated for or addressed through scheme design), and its characteristics lend themselves to a high quality green infrastructure led mixed-use development proposal.
- 1.6. Accordingly, HD Ltd is committed to providing the information necessary to demonstrate the technical suitability of the Site and that it is deliverable. This Statement, and associated appendices, aims to do this and is therefore structured as follows:
 - **Section 2** describes the Site and summarises its planning history;
 - **Section 3** outlines the development proposals, and presents the masterplan;
 - **Section 4** addresses environmental matters, considering ecology, landscape, agricultural land, and ground conditions;

- **Section 5** addresses technical matters, considering highways, drainage, and air quality;
 - **Section 6** overviews the Site and the proposed development's sustainability credentials;
 - **Section 7** deals with deliverability and viability matters; and
 - **Section 8** provides a summary and conclusion.
- 1.7. The extent and scope of this submission, and the technical and environmental evidence that is enclosed within it, has been informed by correspondence from BCBC and discussions with Officers to reflect the site's opportunities and constraints and to reflect the 'Key Issues to be Resolved' listed in Appendix 2 of the Preferred Strategy. A pragmatic approach has been taken to the level of information provided at this stage in order to be able to clearly demonstrate site deliverability and suitability. Further investigations and clarity may be provided at a later date, as and when the masterplanning process progresses.
- 1.8. It is reiterated however that, reflecting its extensive planning history, the Project Team has an excellent knowledge of the Island Farm site, and its constraints, not least as considerable technical documentation was submitted as part of the 2008 outline application (including EIA) and subsequent reserved matters. This reports summarises the findings of a suite of technical and environmental studies to demonstrate that there are no significant constraints which would prohibit the proposed allocation of the Site being delivered in the Replacement LDP's plan period.

2. Site Overview

Introduction

- 2.1. This section of the Statement describes the Site and considers its surroundings, before summarising its planning history.
- 2.2. The below map extract shows the location of the site as well as to key relevant services and facilities within the settlement of Bridgend:

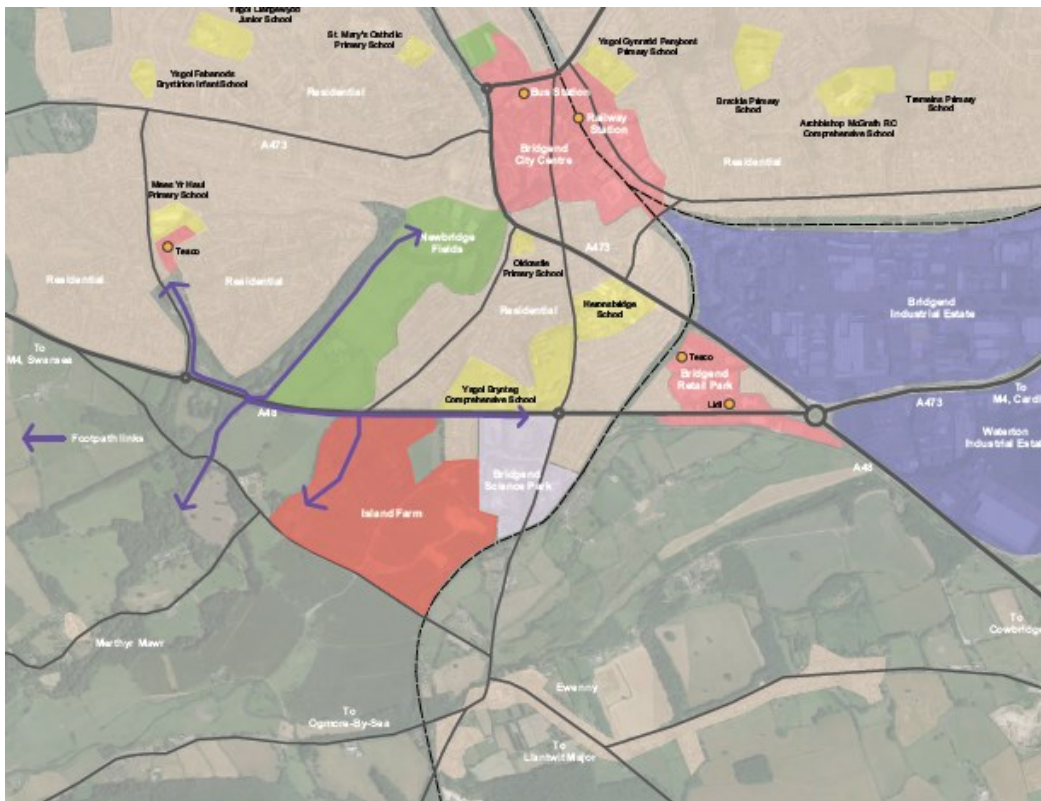


Figure 2.1: Site Context Plan

- 2.3. Island Farm is bordered to the northeast by the Bridgend Science Park, to the east by a nursing home, and to the southeast by the Bridgend to Llantwit railway line (the former Vale of Glamorgan Railway). The northern boundary of the site is formed by the A48 and the settlement of Bridgend beyond to the north as well as a cul-de-sac of houses at Island Farm Road and Island Farm Close. The site is bordered to the south by New Inn Road and to the west by Merthyr Mawr Road, beyond which lies predominantly agricultural land uses. This is shown in the aerial photograph below:



Figure 2.2: Island Farm Aerial Photograph

- 2.4. The Island Farm site has a total area of some 49.1ha and is under two ownerships; BCBC who own 13.3ha and HD Ltd who own the remaining 35.8ha.
- 2.5. The BCBC land is sited within the northern sector of the site immediately to the south of the A48 and formed part of the former Crossways Country Club and Second World War prisoner of war camp. A single storey building, the only surviving building from the camp (Hut 9) has been listed (Grade II) and is located in the northeast part of the site. The remainder of the BCBC owned land predominantly comprises scrub, rough grassland and treed habitat land. As explained below, all BCBC-owned land is designated as a Site of Interest for Nature Conservation, and, other than the proposed access from the A48, is not proposed for any built development.
- 2.6. The land within HD Ltd's ownership is located broadly to the south of the BCBC land and is used for agricultural purposes by a single tenant farmer and comprises a series of inter-connected in medium sized arable fields bounded by mature hedges, with the exception of the southwestern field which has been subject to extensive ecological enhancement measures (under the extant planning permission). A set of overhead power cables bi-sect the site running from east to west.
- 2.7. The site is generally free from constraints that could preclude development. Whilst land under the ownership of BCBC is designated as a SINIC, HD Ltd's land (where the built development is proposed) is not subject to any statutory or non-statutory ecology designations. Likewise, the site is not subject to any local or

national landscape designations and, whilst Hut 9 is Grade II listed, there are no listed building on the part of the site where built development is proposed, nor is this land within a conservation area.

2.8. The site is entirely within Flood Zone A and therefore considered at low or no risk of flooding.

Planning History

2.9. Island Farm has an extensive planning history relating to various sport-led mixed use developments. The most recent, and most relevant application relates to the development of the Island Farm site to deliver a sports village (ref. P/08/114/OUT) comprising of the following elements:

- 21,000 sqm extension to the Science Park;
- 15,000 seat stadium;
- 5,000 seat stadium (Rugby Union);
- 2,000 seat stadium (Football);
- Indoor tennis centre (including 10 outdoor courts); and
- Indoor 4G Training facility and sports centre

2.10. The approved masterplan submitted showing how these uses could be delivered on the site is replicated below:



Figure 2.3: Sports Village Masterplan

- 2.11. Outline planning permission was granted for the sports village in March 2012 and subsequent reserved matters have been agreed for the tennis centre (P/14/354/RES), ecology and landscape mitigation (P/14/823/RES), and strategic infrastructure (P/14/824/RES).
- 2.12. Whilst no longer extant, this permission has, in part, been lawfully implemented though there is currently no intention by HD Ltd to deliver any of the elements of the sports village development, as approved, with the exception of a revised tennis centre. The parts of the site subject to the enabling works are clear from the aerial view image at figure 2.2 above.
- 2.13. A tennis centre is proposed on the eastern part of the site and therefore, the new masterplan for the site continues to show this proposed use as part of the wider mixed-use scheme. HD Ltd intend to submit a new planning full planning application for a revised tennis centre development in autumn 2020, which follows its collaboration with the Lawn Tennis Association and Tennis Wales, to provide a new, community tennis centre on the Site.
- 2.14. The Site's positive planning history clearly establishes that the principle of development of the site has long been accepted and considered appropriate by BCBC, and other stakeholders. Some form of development of the site has been envisaged at Island Farm for many years, but for various reasons, has not come forward as anticipated. The proposal to allocate the Site in the Replacement LDP offers a new planning chapter for the Site and its development, for a new mix of uses which is considered deliverable and viable. Any technical and environmental constraints posed by the Site have been acceptably overcome, and mitigated against, as part of the previous development proposals – and as set out in subsequent sections of this Statement, can and have been considered and mitigated against as part of the latest masterplanning process.

Suitability of the Site for Development

- 2.15. The Site is clearly suitable for development, and is compliant with the LDP Preferred Strategy, because:
- Its planning history has established the principle of development of the majority of the Site (i.e. Island Farm) for a long period of time, albeit for a different range of uses;
 - It is sustainably located on the southern fringe of Bridgend, a settlement that is positioned at the top of the settlement hierarchy, reflecting the levels of services and facilities that are available within it;
 - The site is located adjacent to Bridgend Science Park, and in close proximity to Bridgend Industrial Estate and the town centre, which offers employment opportunities;
 - It is free from constraints that could preclude development, and is not subject to any statutory designations. Where there are local designations effecting the site (such as the SINC), no built

development, other than required road access, is proposed. Where there are constraints, these can either be mitigated for or taken into consideration in the masterplanning process;

- Suitable vehicular access can be obtained from the A48 to the east of Merthyr Mawr Road; and
- Further, the site is highly accessible by a range of means of public transport, and by foot/bicycle. It has good access to Bridgend railway station.

3. Proposed Development

Placemaking

- 3.1. At the core of Planning Policy Wales (Edition 10) (December 2018) is the principle of placemaking. A key national priority is to deliver high quality, sustainable places, through a placemaking approach which should be at the forefront of plan making. Placemaking is considered a key element to deliver on the aspirations of the PPW and drive plan-making and development management decisions given that it is seen as a way of delivering on the wellbeing goals and creating high quality sustainable places. Placemaking should consider and respond to a site's unique characteristics to create an attractive, sociable, accessible, active, secure, welcoming, healthy and friendly place.
- 3.2. In the preparation of plans, and the allocation of land for development, a placemaking approach will identify key design parameters and cumulative infrastructure requirements of development across the wider area to inform policy and site specific allocations. On a site specific level, development plans are expected to contain concept / schematic frameworks, design principles and infrastructure requirements for key sites. A masterplanning approach is one of the placemaking tools advocated by the Welsh Government in the Development Plan Manual 3 (Consultation draft, 2019) and is an approach proposed for this Site.

Indicative Masterplan – A GI-led Mixed Use Development

- 3.3. To this end, a Proposed Masterplan Document prepared by Roberts Limbrick (and enclosed at **Appendix 1**) provides an indicative masterplan and addresses the nine masterplanning matters requested by BCBC Officers in its letter dated 19 December 2019. The masterplan (updated June 2020) has been prepared following dialogue with BCBC and based on guidance provided by BCBC's Highways and Education departments. It has been updated to take on board feedback received from BCBC following the April 2020 submission.
- 3.4. The aim of the indicative masterplan is to respond to the principles of placemaking to deliver a high quality, sustainable, and unique place. The Site is characterised by strong landscape boundaries and is framed by Merthyr Mawr to the south and the proposition is to respond to this context by delivering an landscape led master planning approach. As such, central to the masterplanning process to date has been the aim of creating a new mixed use development which is focused around the site's natural assets, including existing and proposed green and blue infrastructure. The development has placemaking as its focus and that is a product of the site itself: a bespoke and specific place with a robust structure that is a product of the Site and its issues and opportunities.
- 3.5. The masterplan for the site is replicated below:



Figure 3.1: Island Farm Masterplan

3.6. The masterplan shows that the Island Farm site can accommodate:

- A 4.07ha parcel (as advised by the brief provided by BCBC’s Education Department) of land to facilitate the relocation of the Heronsbridge Special Educational Needs School. This could benefit from its own access from Technology Drive through Bridgend Science Park but the masterplan includes pedestrian links to other parts of the development;
- A 1.42ha parcel of land to deliver a 1 form entry primary school to serve the development;
- A mixture of different types and tenures of housing. At a density of 40 dph (which is considered to be appropriate for a sustainably located edge of settlement site such as this) and with a net developable area of 18.33ha, a total of 733 homes;
- An indoor and outdoor tennis centre;
- A modest commercial / community “hub” to service the residential properties which is located to link in with the two schools and the indoor and outdoor tennis centre;
- Site access from A48 via a tree-lined road as well as separate walking/cycling route. Within the development there will be a range of primary, secondary, and tertiary streets. The primary road will provide a circular route within site;

- Retention of the land designated as a SINC and the South Western field as a nature conservation area (inclusive of extensive ecological mitigation works already implemented on the site); and
- A range of green and blue infrastructure measures which will look to take advantage of existing sink holes on site and the retention of an area of ecological significance. This includes the provision of public open space and place facilities. In total over 24 ha is proposed for blue and green infrastructure, ecological enhancement and public open space. The detailed masterplan, to be developed to inform an outline planning application, will seek to meet required FIT standards to ensure that sufficient public open space is provided as part of the development. It should be noted that Newbridge Fields is located to the north of the site which will also provide green spaces for residents of the proposed development.

Infrastructure Requirements & Delivery

- 3.7. There are, inevitably, infrastructure requirements associated with the above quantum of development, and mitigation that needs to be satisfied in order for development to fulfil the requirements of placemaking and sustainable communities. The following sections consider the various mitigation and infrastructure requirements that are proposed to be delivered as part of the proposed development at the Site.

Education & Community Facilities

- 3.8. Reflecting the truly mixed use nature of the proposals, a range of community facilities are incorporated into the development proposal. Critically, land for two schools is incorporated into the masterplan.
- 3.9. A 1FE primary school is proposed to be located to the south west of the spine road into the development and will provide school places to those students that this development generates. The preferred mechanism of the delivery of the primary school and its timing is to be confirmed, either directly by the developer, or by the Council, using Section 106 contributions.
- 3.10. The site also proposes a larger parcel of land to the west of the tennis centre for a Special Educational Needs schools to allow the possible relocation of existing operations at facilities at Heronsbridge School. The safeguarding of this land follows dialogue with BCBC that it intends to relocate the existing Heronsbridge School to a new location, and Island Farm is considered exceptional opportunity. Whilst the masterplan shows the potential location of this facility, and safeguards land for it, BCBC will be responsible for its delivery (and thus funding and timing).
- 3.11. Whilst likely to come forward prior to wider proposals at Island Farm, HD Ltd is proposing to submit a full application for a tennis centre on the site which will provide further community facilities and synergy with the two schools that will be on the site.
- 3.12. Given the scale and nature of the development proposed (which as well as supporting a residential population will also offer facilities that attract people from outside of the development, including employees

at Bridgend Technology Park) a modest element of commercial and community floorspace is proposed. Whilst the exact form that this will take is yet to be finalised and will be dependent upon demand and a marketing process, this is considered likely to be a small convenience store (for basket shopping) and perhaps a café or coffee shop.

GI and Ecological Mitigation

- 3.13. Central to the masterplanning vision has been creating a development that is green and blue infrastructure led as well as responding to the Site's ecological opportunities for enhancement and protection.
- 3.14. For Island Farm this is realised by the retention of the SINC immediately south of the A48 (an access road is proposed in this area though this will incorporate measures for ecological linkages), ecological enhancements to the southwest field as part of the implementation of the previous permission, the retention of the existing hedgerows that separate fields, the re-purposing of existing sink holes as landscape features of visual interest, and the introduction of attenuation basis with SuDS functions.
- 3.15. The previous planning permission on site also required the implementation of a 'green bridge' over the spine road. The need for this type of mitigation, and possible alternatives, will need to be explored as part of the detailed design of the development based on further and updated ecology surveys.

Highways Infrastructure

- 3.16. The site is bound to the north by the A48, a single lane trunk road that runs along the southern fringe of the settlement of Bridgend, running westwards to Pyle and towards Port Talbot, and eastwards to Cowbridge and towards Cardiff.
- 3.17. It is proposed that vehicular access will be obtained from the A48 to the east of Merthyr Mawr Road. A separated footpath is proposed from the A48. Given that it has not been possible to undertake traffic counts at the time of writing, these accesses have not been designed and modelled but it is envisaged that it will be smaller than that permitted as part of the sports village proposals. The undertaking of the full TA will also confirm the requirement for further off-site highways and accessibility improvements.
- 3.18. The development also provides the opportunity to deliver offsite highway improvements to the A48 and Ewenny Road that will provide active travel benefits, including alterations to speed limits and alterations to speed limits.
- 3.19. It has been assumed, at this stage, that Electric Vehicle Charging points are provided for all residential dwellings on the site.

Renewable Energy Strategy

- 3.20. A Renewable Energy Strategy has prepared by Troup, Bywaters + Anders (enclosed at **Appendix 2**) which explores how various renewable energy features could be incorporated into the development and considers their effectiveness. In this respect, the Strategy goes on to make the following four recommendations:
- All buildings should be built to PassivHaus standard or the edition of Part L in force at the time if that requires higher standards
 - Install a district heating network (DHN) to serve all buildings (including schools) on the Island Farm site. The DHN will use heat pumps as main heat generator topped up by electric or gas boilers to achieve a flow temperature of 60oC. DHW provision should be pre-heat of domestic hot water storage cylinder from DHN with top up from immersion
 - Roof-mounted PV should be maximised on all buildings, either for direct consumption by the building or to feed private LV networks which distribute the renewable electricity around each site
 - If the concept of private LV networks is taken forward, the feasibility of installation of small scale wind turbines should be investigated further. They could complement the electricity output of the PV and increase the share of low carbon and low cost electricity on site
- 3.21. The energy strategy for the site will evolve with the detailed design of the development. However, there is an aspiration to deliver a low carbon development that embraces new and innovative means of producing and using its own renewable energy and ensuring that new buildings are energy efficient.

Utilities

- 3.22. Included at **Appendix 3** is a Utilities Strategy Report also prepared by Troup, Bywaters + Anders. The Report considers the electricity, water, and gas for each element of the development proposed on the site and presents a series of high level options for consideration.

Other Section 106 Requirements

- 3.23. The proposal has been prepared to be policy compliant in terms of planning obligations (as per BCBC policy at the time of writing). As such, the adopted LDP requires that 20% of homes are affordable and the masterplan and High Level Viability assessment has been prepared on this basis. Likewise, the High Level Viability assessment includes a contribution for community facilities as well as education in accordance with adopted guidance.

4. Environmental Considerations

Introduction

- 4.1. This section of the Statement will address various environmental considerations, taking account of matters relating to ecology, landscape, agricultural land, and ground conditions.

Biodiversity

- 4.2. Ethos Environmental Planning has undertaken an ecological appraisal of the Site, which is enclosed within **Appendix 4** of this Statement. This included a site walkover and makes recommendations for future detailed surveys which will be required to be undertaken to inform detailed design of the development. The Appraisal refers however to the extensive surveying of the Site previously in association with the Sports Village development. It should be noted that, as part of the enabling works for the Sports Village, a significant amount of ecological mitigation was carried out on site, and thus, unusually, the position on this Site is one that consideration mitigation has already been implemented on site. This includes extensive landscaping works in the south-west field, hedgerow relocation, the creation of an artificial bat roost and the creation of two ponds.
- 4.3. Part of the Island Farm site (i.e. the land under BCBC ownership) is designated as a SINC. This area is to be retained as a SINC as part of the development proposal. It is required that the spine road from the A48 dissects the SINC and there are appropriate mitigation measures that can and will be implemented to reduce and mitigate any adverse effects that this required infrastructure has on the integrity of the SINC. As noted above, the South West field, owned and already improved by HD Ltd (at its own expense), is also to be retained as part of the development as a nature conservation area (and possible extension to the SINC). There are opportunities to use this area in association with the new schools to be provided on the site, and open up its access to the public via sensitively designed nature paths.
- 4.4. As demonstrated by the Site's planning history and the recent ecological appraisal, there are no in principle constraints to development of the Site as a result of its ecological condition. A number of measures already are, and can continue to, provide robust and effective mitigation to any impacts on biodiversity. The Project Team expects to engage with the BCBC Ecologist and NRW as the detailed design for the proposed development progresses.

Landscape Matters

- 4.5. Included at **Appendix 5** is a Landscape matters Note prepared by Savills which considers the various designations that the site is subject to, the outcomes of LANDMAP analysis, and the relevance of the site's planning history. This note also sets out how the masterplan responds to its location as it proposes a GI led response that requires high quality landscaping and architectural design to capitalise on accessibility to Bridgend Town Centre.

Agricultural Land Classification

Background

- 4.6. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It is the only approved system for grading agricultural land quality in England and Wales and is set out in the Welsh Office Agriculture Department 1988 guidelines and criteria for grading the quality of agricultural land (1988).
- 4.7. Agricultural land in England and Wales is graded between 1 and 5, depending on the extent to which physical or chemical characteristics impose long-term limitations on agricultural use.
- 4.8. Best and most versatile (BMV) agricultural land is defined as Grades 1, 2 and 3a Planning Policy Wales (PPW) (Edition 10, December 2018) stating that the plan making and decision making process should give “considerable weight” to protecting BMV. There is a recognition that there may be a need for the redevelopment of some BMV land with Paragraph 3.55 of PPW setting the framework for where this may be acceptable:

*“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.”*

Agricultural Land Classification Map

- 4.9. Whilst detailed survey work has not been undertaken for all land in Wales, Welsh Government prepare and maintain maps which predict the agricultural land quality, the most recent version of which was released in 2020, the first major update since the launching of the interactive maps in 2017. Welsh Government Guidance is clear that this information is for indicative purposes and does not replace the need for a formal survey. The findings of the ALC Map and a summary of ALCs previously undertaken on the site are enclosed in a supplementary supporting note which is provided in **Appendix 6**. This shows that the site is a mix of Grade 2, Grade 3a and non-agricultural land.
- 4.10. The planning history associated with the site has established the principle of the irreversible loss of BMV land on this site. That outline permission, as well as subsequent reserved matters permissions, have been implemented which represent a highly material fallback position.
- 4.11. Notwithstanding the extant planning permission, it remains the case with the new mix of uses proposed on the site, that there is an overriding need for the development and for the Replacement LDP to identify suitable, sustainable and deliverable sites for housing and education uses by virtue of site specific allocations.

- 4.12. Taken together, and given that BCBC's decision to prepare a replacement LDP triggers the need to identify further land for development, it is considered that the above satisfies the test set in Paragraph 3.55 of PPW.

Ground Conditions

- 4.13. Reflecting the site's extensive planning history, a large amount is known about ground conditions of the Site having been informed by various phases of site investigations and survey/ monitoring works. Included at **Appendix 7** is a Summary of Site Investigations prepared by wL².
- 4.14. These documents consider matters relating to ground conditions, permeability / filtration, and contamination which have, where appropriate and if required, been used to inform the masterplanning process and site layout. It concludes that, whilst as is not uncommon at this stage of the development process, further detailed site investigations will be necessary to inform the detailed design (notably the presence and risk of potential additional sink holes), there are no, known, significant constraints to the development of the site resulting from its ground conditions.

5. Technical Considerations

Introduction

- 5.1. This section of the Statement will consider various technical considers, addressing matters relating to highways/transport, drainage, air quality, and noise.

Highways & Accessibility

- 5.2. Included at **Appendix 8** is a Transport Strategic Appraisal and Active Travel Assessment prepared by Corun Associates.
- 5.3. The Appraisal considers the site's accessibility by the private car, public transport, and by foot / cycle, concluding that the site is adjacent to the A48 which provides local and regional road linkages, is well integrated into the local footway and cycleway network, and is well served (and close to) various means of public transport.
- 5.4. It goes onto apply TRICS data to estimate the vehicular trips that the proposed development (and its various constituent parts) would generate, comparing it to the previously consented scheme and assessing its impact on various nearby junctions before concluding that *"there are no obvious highway or transportation reasons why the revised development proposal would not be able to secure planning consent in the near future"*.
- 5.5. The Active Travel Assessment provides an overview of key active travel sites for the Site, identify where there is an existing deficiency in the network, and offer solutions for how these could be enhanced. The document has been prepared in accordance with the Welsh Government Active Travel (Wales) Act 2013 Design Guidance Walking and Cycling Route Audit Tools. It sub-divides the surrounding network into three segments and provides a series of measures for each. Subject to further engagement with BCBC Highways Department, it proposes the following key network improvements:
- Extension of existing Broadlands shared pedestrian/cycle route along north of A48 to Ewenny Signalised Roundabout;
 - Improvement of the existing footway along Ewenny Road Site Access to Ewenny Signalised Roundabout;
 - Adjustments to existing speed limits of the A48 such that they are reduced between the Broadlands Roundabout to Bridgend Town Centre via A48 and B4265 Ewenny Road, and the extension of the 30mph limit between Ewenny Road Site Access to Ewenny Signalised Roundabout; and
 - The conversion of the Picton Court junction to traffic signals.

- 5.6. A full Transport Assessment will follow in October 2020.

Drainage and Flooding

- 5.7. Island Farm is located within Flood Zone A (considered to be at little or no risk of fluvial or coastal/tidal flooding) as detailed in Natural Resources Wales' Development advice Maps and therefore the proposed form of development is considered entirely appropriate on flooding grounds.
- 5.8. Included at **Appendix 9** is a Drainage Strategy prepared by wL². The Drainage Strategy has been prepared such that it relates to both the LDP site and the tennis centre development that is anticipated to come forward independently and in advance of the remainder of the site.
- 5.9. The proposal is for surface water to make use of the site's natural fall by draining via a series of reens and swales to a series of attenuation ponds and tanks along the southern boundary of the site before being pumped up to the adopted sewer at the A48 which drains into the River Ogwr to the west of the site. Foul water will follow the same route, falling naturally to a pumping station at the southeastern corner of the site before being pumped to the Penybont Trunk Sewer at the A48,
- 5.10. The masterplan has been prepared with SuDS principles in mind, looking to make use of attenuation ponds, reens, and swales which will contribute to biodiversity and make attractive features that are part of the masterplan's green and blue infrastructure network.

Noise

- 5.11. Given the nature of the surrounding uses, it is considered that there are no bad-neighbour uses on or close to their boundaries that would preclude development of the site. This is evidenced by the Island Farm Sports Village permission, to which it was concluded as part of the application that the site was suitable for development on noise grounds subject to mitigation and planning conditions.
- 5.12. Likewise, the proposed uses are not considered to be bad-neighbour uses and it is anticipated that noise generated by the development will be lower than that assessed (and found acceptable) for the sports village application. Therefore, it is not considered that noise levels generated by the proposed uses on the site would give rise to any harm to users of the surrounding buildings which cannot be adequately controlled or mitigated by way of planning mechanism associated with any future permissions.
- 5.13. Nevertheless, a full noise survey would be submitted in support of any planning application.

Air Quality

- 5.14. Welsh Government policy guidance requires local authorities to publish an Annual Progress Report by 31st December of each year which monitors results for the previous calendar year, provides a progress report on action plan implementation, and provides updates regarding new policies or developments likely to affect local air quality. Where local and national air quality objectives are not to be achieved, Air Quality

Management Areas (AQMA) must be identified where there is a requirement for the local authority to prepare a Local Air Quality Action Plan detailing measures to improve air quality.

- 5.15. The 2019 Annual Progress Report confirms that air quality in BCBC meets the relevant air quality objectives as prescribed in the Air Quality (Wales) Regulations 2000 and the Air Quality (Amendment) (Wales) Regulations 2002. A single AQMA is designated in BCBC, this being located along Park Street in Bridgend town centre and is designated due to high levels of NO₂. This was designated in January 2019 and is located approximately 1km north of Island Farm. BCBC have monitored the NO₂ and PM₁₀ levels at Ewenny Cross (the roundabout with the A48 and the B4265) since 2011. The 2019 Annual Progress Report did not recommend that an AQMA is designated at Ewenny Cross (although monitoring is to continue) and overall recommended that no further Air Quality Management Areas (AQMA) are designated across BCBC.
- 5.16. An Air Quality Assessment was undertaken and submitted as part of the sports village proposals on the Island Farm site. It was based on vehicular movements that the sports village would generate, namely infrequent but regular peaks (and high levels of coaches and busses) interspersed with non-peak periods where modest levels of vehicular movements would be generated. At Island Farm, during the assessment of proposals for the sports village it was concluded that the use of appropriate mitigation measures could deliver an acceptable solution, albeit that assessment was based on a very different set of proposals which could have a different impact on air quality.
- 5.17. There is considered to be no reason why a similar conclusion could not be reached for the land uses proposed but nevertheless, a full Air Quality Assessment will be undertaken and submitted as part of any future planning application but the site's location and associated planning history suggest that matters relating to air quality would not preclude the development of Island Farm.

6. Sustainability and Wellbeing

- 6.1. Central to the masterplanning process has been the aim to deliver a high quality and sustainable development that responds to the site's characteristics and incorporates a mix and balance of uses that contribute to the development's quality but also respond to demonstrated needs. Where applicable, and appropriate for site specific development, the Welsh Government's Future Well Being Goals and Placemaking Principles have been considered and can be met by the proposed development. Some key sustainability principles that can, and will be, embraced as part of the development are explained below.

Ecological Resilience

- 6.2. The aim of the masterplan is to be green and blue infrastructure led, maintaining the large area of the site that is designated as a SINC whilst also incorporating a range of further environmental measures such as the re-purposing of sink holes as landscape features, the addition of attenuation ponds that can support biodiversity, and the retention and enhancement of existing green features. Significant ecological and landscape mitigation already has, and can further be, delivered as part of the proposed development which would ensure that the ecological value of the Site, and the designated SINC, can be retained and enhanced, as far as possible.

Low-Carbon Development

- 6.3. Further, the development has the potential to incorporate a range of onsite renewable energy generating mechanism (such as PV), surpass building regulations in terms of the quality of the building fabric, and make use of district heating methods. The proposed allocation of the Site will therefore help BCBC to ensure that its plans, and policies, are resilient to climate change and support the transition to a low carbon society based around the principles of Placemaking and the Sustainable Transport Hierarchy. It is considered that this approach will support the well-being goal of ensuring Wales is globally responsible and resilient.

Meeting Housing and Community Needs

- 6.4. From a social perspective, the nature of the development is mixed-use, responding to demonstrated need by incorporating a one form entry primary school as well as facilitating the relocation of existing operations from Heronsbridge School. This will not only serve the development itself but provide a further social function in providing additional capacity outside of the development. It will deliver a range and mix of house types and tenures for Bridgend, and the wider County Borough. Allocation of the site for a mixed-use development is therefore considered to support the aspiration to create a Wales of social cohesive communities.
- 6.5. The High Level Viability Assessment prepared by Savills has been prepared on the basis of, and demonstrated that, the site could be delivered whilst complying with BCBC guidance on planning guidance such that 20% affordable housing is delivered and financial contributions (as well as land) made available for education and community facilities.

Health Impacts

- 6.6. Included at **Appendix 10** is a high level Health Impact Assessment which considers the positive contribution to achieving health output that the development will deliver.

Economic Dividend

- 6.7. The economic dividends of housebuilding are well known in terms of creating direct, indirect, and induced economic benefits through job creation and this development is no different. Further, jobs will be created onsite by the two schools, the tennis centre, and the community/commercial hub,
- 6.8. Residents will obviously contribute to the local tax base and supplement the existing workforce helping BCBC achieve their job creation target.
- 6.9. Taken together, it is considered that the proposals will contribute to the well-being goal of creating a prosperous Wales.

Engagement

- 6.10. At this stage, community engagement is led by the LDP process, but it should be noted that further detailed design work and the promotion of the Site in the planning process will be based on, and underpinned by, early, effective and meaningful community engagement in order to understand and considered a wide range of views in relation to this specific proposals. Thorough engagement as part of emerging proposals will further contribute to the well-being goal related to social cohesion, as the goal related to creating a vibrant culture.

7. Deliverability and Viability

- 7.1. The Replacement LDP should deliver what is intended (i.e. site allocations) through deliverable and viable plans which take into account necessary infrastructure requirements, financial viability and other market factors. As set out in Development Plan Manual 3 (Consultation Draft, 2019), the deliverability and viability of candidate sites should be considered in the round, in a broad and proportionate manner.
- 7.2. The Site is being promoted by the HD Ltd. Island Farm is under the ownership of both HD Ltd and BCBC. As such, other than BCBC itself (whose land is relied upon to achieve the access from the A48 into the Island Farm site), there are no other land owners.
- 7.3. HD Ltd is a local developer with a track record of delivering a series of high quality small-medium commercial and residential developments predominantly within Bridgend. HD Ltd is also the long term owner of Island Farm and was the applicant for the 2008 sports village application as well as associated applications related to reserved matters and planning conditions. HD Ltd has a serious intention to dispose of the Site (other than the Tennis Centre and potentially the commercial / community hub) so that it can be developed for the proposed mixed use scheme.
- 7.4. Savills is confident that the Site would be a very attractive proposition to a number of regional and national housebuilders – and indeed, a number of developers have already indicated to HD Ltd, their interest in the Site. The Site lies in a buoyant market area.
- 7.5. A High Level Viability Assessment prepared by Savills was submitted to BCBC in April 2020. The Assessment was based on the scheme deliverables outlined in Section 3 of this Statement, which includes land for the two schools, and a policy compliant Section 106 and level of affordable housing provision. The assessment relied on high level information and assumptions about infrastructure and abnormal costs. The assessment concluded that the proposed development of the Site is viable, because after considering the broad known costs, the value/return on the development is sufficient to provide both an adequate profit margin for the developer and an uplift in land value sufficient to encourage the landowner and site promoter, HD Ltd, to sell.
- 7.6. There has been further dialogue between Savills and BCBC with regards to adding to the already submitted High Level Viability Assessment and this will follow separately in due course.

8. Conclusions

- 8.1. This Statement has been prepared by Savills on behalf of HD Ltd, the land owner and promotor of Island Farm on the southern fringe of Bridgend (the Site). HD Ltd welcome the inclusion of land at Island Farm as a Strategic Growth option for Bridgend.
- 8.2. In principle, the Site is in a sustainable location and is generally free from significant physical constraints including land ownership, infrastructure, access, ground conditions, landscape, heritage designations, flood risk issues and pollution. It has a positive planning history, as it has previously been recognised as a suitable location for development.
- 8.3. A masterplanning exercise has been undertaken by Roberts Limbrick, on behalf of HD Ltd, to ascertain the capacity of the Site. This shows that the Island Farm site could deliver up to 733 homes, a relocated Heronsbridge Special Educational Needs School, a one form entry primary school, and a tennis centre (which it is anticipated will be delivered separately and in advance of the LDP).
- 8.4. Central to the masterplanning process has been the aspiration to deliver a high quality green and blue infrastructure led mixed-use development which responds to the Site's unique characteristics. A review of the masterplan shows the retention of key ecological features and the addition of strategic planning, greenspace, and attenuation ponds that are not only functional in nature but add to the high quality nature of the proposals.
- 8.5. This report, and the evidence that sits behind it, demonstrates the technical suitability and deliverability of the Site for development, and thus, allocation in the Replacement LDP. The Site is free from significant environmental and technical constraints that could preclude development and development is deliverable and a financially viable proposition.
- 8.6. The overall conclusion from this Statement is that the Site has clear potential for new development and is a deliverable allocation in the Deposit RLDP. There are known constraints which will affect the detailed design of the development of the Site, but these can be inherently designed into the scheme, mitigated against and compensated for. In terms of financial viability, the site clearly has development potential for the proposed use and the site is attractive to the market for development at the proposed location. It has been demonstrated (without prejudice) that based on the high level proposals, the Site can accommodate the broad levels of affordable housing, other policy requirements and infrastructure costs (including a new primary school).

Appendix 1 - Proposed Masterplan Document



Appendix 2 - Renewable Energy Strategy

Appendix 3 - Utilities Strategy

Appendix 4 - Ecology Appraisal

Appendix 5 – Landscape Matters Note

Appendix 6 – ALC Supplementary Note

Appendix 7 – Summary of Site Investigations

Appendix 8 - Transport Strategic Appraisal



Appendix 9 - Drainage Strategy



Appendix 10 – Health Impact Assessment
