

# 7. Employment

## 7.1 POLICY E1 Availability of Readily Developable Land

### **Objection**

*Conditionally Withdrawn*

DO/51229/1855      *National Assembly for Wales*

### Issue

7.1.1      This is whether or not the relationship between the table in Employment Appendix EMP1 showing vacant land and allocated sites is sufficiently clear.

### Conclusions

7.1.2      The Council proposes an amendment to para 5.4.2 in the PIMS to indicate that Appendix EMP1 will be updated and published annually to show the availability of land on allocated sites. I consider that the PIMS amendment would provide the necessary clarification, and note that the objection has been conditionally withdrawn.

### Recommendation

7.1.3      I recommend that the text in para 5.4.2 be modified as shown in the PIMS.

## 7.2 POLICY E2.2 Key Employment Allocations Bridgend Industrial Estate

### **Objection**

DO/51230/1891      John Raymond Transport

### Issue

7.2.1      This is whether or not the objection site should be allocated as part of a key employment allocation, or should be identified as suitable for a broader range of employment generating uses.

### Conclusions

7.2.2      The objector argues that the changing structure of the local economy requires a more flexible approach to planning for employment, so that uses other than B1, B2, or B8 would be permitted on this site. It is suggested that alternative uses such as leisure, public house or hotel could be appropriate.

7.2.3      PPWales section 7.2 recognises the need for a land bank for industrial use, and advises that sites designated for industrial development should not be used for other single purposes such as retail, leisure or housing which could be located elsewhere. The new national

policy document commends the selection of key employment sites in line with sustainability principles to provide a focus for investment. I consider that Bridgend Industrial Estate, described by the Council as a 'flagship' estate with a variety of large and small businesses, having good access to the strategic road network and the built up area of Bridgend, represents a sustainable location for employment uses. In my view, sites should be kept for B1, B2 and B8 uses.

7.2.4 A number of ancillary service uses for people employed on the estate are already available there. The Plan seeks to protect and regenerate existing town centres and, in my view, allocating this site for A3 or leisure uses could conflict with that objective. I conclude that this site should remain as part of the key employment allocation.

**Recommendation**

7.2.5 I recommend that no modification be made.

**7.3 POLICY E2.3  
Key Employment Allocations  
Brocastle**

**Objection**  
DO/51074/1213 Mr N McLean

**Issue**

7.3.1 This is whether or not all the land at Brocastle should be allocated as a key employment site.

**Conclusions**

7.3.2 The objector argues that the site has been allocated for employment use in the UDP because of an outline planning permission granted in 1998 for industrial uses and the construction of a new road. According to the objector, the application was promoted for an automobile components' company to locate in Bridgend. This was said to be necessary to secure the long-term future of Ford in the area. The components' company has not moved to the area and the Ford plant remains in business, implying that the special circumstances surrounding the grant of planning permission no longer prevail. Though the objector considers there to be a sufficiency of industrial land allocated on other sites in Bridgend CB and in neighbouring local authority areas, he accepts that it may be unrealistic to expect that Policy E2(3) could be deleted from the UDP. He therefore proposes that the development brief for the site should strictly limit development at the eastern and southern end of the site, and reduce the developable area to no more than 30has.

7.3.3 The Council responds that the disposition of land uses on the objection site will be determined through the development brief, the content of which would be too detailed for the UDP. I agree that the detailed layout on the site should be a matter for a development brief, but the size of the allocated site is a legitimate matter for scrutiny at this stage. The planning history described by the objector is not disputed by the Council, and no evidence is put forward to indicate that a single inward investment project requiring a 'key' employment site of more than 50 has is in the wings.

7.3.4 Information on the demand and supply of industrial land in Bridgend and South Wales is included in a study of 13 potential major employment sites carried out by Wyn Thomas Gordon Lewis Ltd and others in 2001 (CD155). This suggests that in April 2001, there were some 277 sites available including 12 sites of more than 40 has (100 acres) in South Wales. The number of enquiries for employment land was 422 including only 6 for sites of more than 40 has. This indicates to me that there is an ample supply of very large industrial sites in the region, and very few potential takers.

7.3.5 This view of the market is reinforced by the UDP itself which, at para 5.5.4, describes a trend in the 1990s towards smaller and fewer investment projects. Industrial land figures for Bridgend indicate that industrial land take-up averaged some 11 has a year for the period 1985-2001, but only 4.5 has 1994-2001. The last land take of 50 has occurred in 1978 (Ford Company Waterton), since when there have been two other substantial developments, 20 has at Wern Tawr in 1978 and 26.5 has at Pencoed (Sony) in 1991.

7.3.6 The UDP distinguishes the key sites in Policy E2 by their large size, in excess of 50has. As a matter of fact, Appendix EMP1 shows that only Brocastle and Sarn Park have as much as 50 has remaining to develop. The reasoned justification in para 5.5.4 could usefully be amended to describe key employment sites more accurately.

7.3.7 I accept the need to maintain a large and varied portfolio of employment sites, to be able to respond positively to inward investment opportunities and to take a long term view of the market. However, PPWales para 7.2.1 calls for realism in planning for employment land and a review of all non-housing allocations when preparing UDPs. It does not imply that the existence of an outline planning permission should prohibit a re-appraisal, especially as not all planning permissions are implemented.

7.3.8 The Ogwr Borough Local Plan identified a smaller employment site east of the A48, occupying the northern portion of the current site, of 18 has. On the basis of recent and past take-up of industrial land in Bridgend and the region, a site of 18 has would be perceived by potential single users as large. The M4 Corridor Study for the Standing Conference on Regional Policy in South Wales, 1995, (CD84) defined strategic sites capable of accommodating large scale, single user developments as 14 has plus. On this basis, and bearing in mind that only one commercial/industrial development of 50has plus has taken place in Bridgend CB in some 25 years, I have serious doubts about the need to identify such a large site at Brocastle.

7.3.9 Development on the E2(3) site would extend Bridgend and Waterton to the south-east. It would result in urbanisation of a tongue of greenfield land which is highly visible beside the A48, and is currently part of the countryside. Unless there were substantial economic benefits, there would be conflict with the land use strategy and Policy EV1.

7.3.10 The Wyn Thomas Gordon Lewis study of industrial sites confirmed the objector's opinion that the site has poor public transport accessibility. It also awarded a modest score of 2 out of 5 for access to markets/direct access to the M4. Though a single large user might generate sufficient demand for improved bus services and a contribution to highway improvements, I consider that the site has deficiencies in terms of accessibility. In particular, it is peripheral to the main settlements and the northern part of the County Borough where new job opportunities are urgently needed.

7.3.11 PPWales advises that key employment sites should be selected in line with sustainable development principles, with preference for the use of previously developed land, proximity to existing urban developments, and good accessibility to the public transport and primary road network. The Sustainability Appraisal for the UDP commented on Policy E2 that

the provision made in it is at odds with all the aspirations for greater sustainability through land use and transportation planning, except insofar as there is a need to extend employment opportunities and diversify the economy.

7.3.12 It occurs to me that an allocation of some 30 has, as proposed by the objector, would be more than sufficient to accommodate another Rockwool or Sony. I recommend later in this Chapter that Sarn Park should be taken out of the employment allocations. I have considered whether the allocation at Brocastle should also be removed or reduced, as suggested by the objector. However, in the interests of maintaining a balanced portfolio of employment sites, and retaining the ability to respond positively if a very large investor comes along, I shall recommend that the site is allocated in its entirety. I conclude that the allocation should be made, but on the basis that it is used strictly in accordance with Policy E2 and reserved only as a key employment site 'for large scale investment'.

**Recommendation**

7.3.13 I recommend that the site in PolicyE2(3) at Brocastle should be allocated for key employment purposes.

7.3.14 I recommend that paras 5.5.4 and 5.5.5 of the text be modified to describe more accurately the characteristics of key employment sites.

**7.4 POLICY E2.5  
Key Employment Allocations  
Sarn Park**

**Objections**

- DO/50880/945 Bridgend Biodiversity Partnership
- DO/51050/1171 Campaign for the Protection of Rural Wales
- DO/50864/902 Coity Village Association
- DO/51185/1417 Coity Walia Commoners Association
- DO/50876/928 Conservators of the Coity Walia Commons
- DO/51209/1655 Countryside Council for Wales
- PCO/51209/2227 Countryside Council for Wales
- DO/50911/983 Ms S Davies
- DO/50899/971 Mr & Mrs Farmer
- DO/51199/1500 Mr H Griffiths
- DO/51199/1501 Mr H Griffiths
- DO/51199/1502 Mr H Griffiths
- DO/51199/1503 Mr H Griffiths
- DO/51058/1187 Mr C Hopkins
- DO/50878/931 M R Keating
- DO/51059/1190 Ms A Lalic
- DO/51074/1212 Mr N McLean
- DO/51051/1174 Ms S Rowe

**Issues**

7.4.1 These are:

- Whether or not the need for economic growth justifies Sarn Park to be allocated as a key employment site in the UDP;
- Whether or not, bearing in mind the site's planning history and the objectives of the UDP, the allocation for employment use should be made;
- Whether or not any harm to common land, the landscape and nature conservation would be justified by the potential economic benefits from development.

## Conclusions

### The first issue

7.4.2 The Bridgend Biodiversity Partnership questions whether there is an established need for any development on this site in the light of other allocations for E2 and R9 land. Mr McLean argues that sufficient land has been allocated in Bridgend for employment purposes for some time, and there is no justification for adding to it.

7.4.3 I understand the need for a land portfolio which offers choice and flexibility to inward investors and local enterprise. However, even if allowance is made to delete the site at Wern Fawr in accordance with the PIMS and to make some other smaller amendments, there would be some 300has of available land for new industrial and commercial uses in the County Borough. This is nearly double what would be required to reduce employment to zero, according to Table EMP1 in Chapter 5 of the UDP. On the basis of the Council's figures for industrial land take up for the period 1985-2001, which give an annual average of 11.4 has, the UDP's allocation even without Sarn Park would remain generous.

7.4.4 The Council claims support for the substantial employment land allocation from a comparative study of industrial sites carried out by Wyn Thomas/Gordon Lewis and others (CD155). This gives Sarn Park a high score for economic indicators, because the site is large, could potentially accommodate plenty of jobs, would not take good agricultural land and would provide good access to markets (via the M4). However, it scores very badly on 'deliverability' which includes legal and ownership factors, infrastructure, drainage and utility services. The consultants also indicate that they have had access to only limited information on the site, and have not seen a pre-feasibility study by the WDA which would be a pre-requisite for a decision on whether or not sites should be actively promoted.

7.4.5 Mr McLean refers to a study by GVA Grimley published in 2002 which predicts, at national level, continuing contraction in the manufacturing sector over the next five years and an over supply of employment land. The Council's evidence to the Inquiry included an assessment by King Sturge of employment trends and prospects for Bridgend. This also indicates that Bridgend, with a high dependency on a limited range of manufacturing employers, may be vulnerable to job losses and face difficulty in attracting major new investment in traditional manufacturing.

7.4.6 In these circumstances, I consider that it may be difficult to develop satisfactorily a very large site at Sarn Park for industrial employment purposes. I have described in section 7.3 above my misgivings about the market among single users for a very large site in excess of 50 has. The Council places much emphasis on the accessibility of this site to the M4, though the experience of other employment sites allocated in previous plans at neighbouring junctions is of only mixed success over many years. The Council argues that the employment allocation could bring money for highway development which would resolve some of the existing junction problems. However, any developer contributions to highway improvement could only be

expected to relate fairly to the needs of the development. Moreover, the Council envisages that retail development would be required to 'enable' the employment allocation to be taken up at this site. All this, in my view, casts doubt on the attractiveness of the site for major employment use, notwithstanding the current interest of Grantchester Plc in the site.

7.4.7 Objectors also question the 'deliverability' of the scheme, bearing in mind the lengthy planning history which has not resulted in development. Based on the Wyn Thomas/Gordon Lewis assessment and its detailed knowledge of the constraints, the Council argues that the site could begin to provide jobs from 2006 onwards. On this basis, the site could be developed within the period of the UDP.

7.4.8 The Council argues that Sarn Park differs from the other Policy E2 sites in that it is well placed to serve the valley communities to the north, where there is a measure of deprivation and disadvantage. The King Sturge report indicates that the changing business space market favours service sector and IT related projects rather than traditional manufacturing projects. The Council and Grantchester Development Properties Ltd submitted an agreed statement to the Inquiry for an amendment to the text in para 5.5.5 of the UDP to include 'prestige office development' at Sarn Park. This may improve the chances of some development occurring, but would require different skills from a manufacturing or distribution enterprise.

7.4.9 Para 7.4.3 of PPWales implies that certain types of business may provide opportunities for disadvantaged social groups, but this requires an analysis of social circumstances. The Council advised at the Inquiry that it is working closely with a specialist agency to avoid skills' mismatch problems. However, no specific evidence was given to indicate how unemployed people in the deprived communities of the County Borough would relate to and benefit from a 'prestige office development'. The Council proposes changes to para 5.5.5 in the PIMS, to indicate that the precise disposition of land uses at Sarn Park would be decided by way of a development brief. However, I agree with the CCW that the intended uses on this prominent key employment site should be specified in the UDP and not relegated to a development brief.

7.4.10 I conclude that the economic growth arguments in favour of Sarn Park being allocated as a key employment site in the UDP are superficial, based on the site's large size and position near to the motorway. Closer analysis shows that, with a changing national economy and local circumstances, there is no identifiable need and there can be no certainty that this site would be developed for key employment purposes in the lifetime of the UDP.

## **The second issue**

7.4.11 The Council argues that the succession of planning permissions granted on this site over the past 30 years establish a principle of development and are a material factor. However, these permissions have revolved around provision of a leisure park with golf course and retailing facilities. I consider that they provide no justification for a key employment development on more than 50 has of land.

7.4.12 The UDP is founded on sustainable principles and the preferred land use strategy. This envisages limited dispersal of new development in the main urban areas, and wherever possible on redundant or under-utilised urban land and optimising the use of committed development sites. The Council's Sustainability Appraisal, as reported in section 7.3 above, was critical of Policy E2. The objection site is detached from the main settlements as defined in the UDP and, if developed, would result in a significant loss of greenfield land.

Development would be contrary to well established national and local policies to protect the countryside.

7.4.13 The recent PPWales states that key employment sites should be selected in line with sustainable development principles, with preference for the use of previously developed land. Mrs Davies, Ms Lalic and Mr and Mrs Farmer argue that existing trading estates at Litchard, Brackla and Brynmenyn have vacancies and should be upgraded before this undeveloped land is taken for business purposes. Para 5.1.4 of the UDP concedes that in projecting employment land needs, no allowance has been made for intensification on existing sites or the expansion of indigenous companies, that all new jobs are assumed to be provided on new sites. In the climate of economic change described in the King Sturge report (increased demand for small sites), it seems to me that these options should be investigated thoroughly before making this greenfield allocation at Sarn Park for employment purposes.

7.4.14 Mr McLean describes the site's poor location in relation to the railway and the difficulties with traffic congestion at Junction 36 on the M4. Though the Council envisages major improvements to highways to accommodate new development at the site, this site is poorly located for existing public transport services and is outside the main settlements in Bridgend CB. Its development would be unlikely to reduce the need for travel by motorised means. I conclude that the site's planning history does not provide justification to allocate this land for key employment uses, and that the allocation is in conflict with principles of sustainable development.

### **The third issue**

7.4.15 The CCW and Bridgend Biodiversity Partnership, as well as local groups and individuals, argue that the site has significant value for nature conservation. The proposed development would take up a substantial area of Cefn Hirgoed, an area of common land and improved grassland, comprising a mosaic of wet heath, with bog, marshy grassland and wet flushes. It is said to support a wide variety of specialised plants and animals. The Council does not dispute that much of the site has nature conservation interest, and is a designated SINC.

7.4.16 However, the Council argues that the ecological considerations do not outweigh the economic need for this employment site. Mitigation measures have been investigated by a specialist consultancy based on ecological surveys and evaluation. They propose the re-creation of the habitats found on the allocation site on areas of replacement common land. They argue that there is an abundance of potential replacement land in the vicinity, and that with good management, there could be a net gain for nature conservation. Mr Griffiths considers that it would be an 'environmental and engineering impossibility' to recreate this site, and questions whether the necessary care over implementation and management could be secured. He and other objectors argue that those with interests in any replacement land have not had the opportunity to express their views on the overall scheme. I consider that it would be feasible to follow the proposed mitigation measures, but given the large size of the site and its complexity as a habitat for wildlife, as well as the need for sustained high quality management, there would be an element of risk to wildlife and habitats.

7.4.17 The CCW indicates that the Council should be aware of the implications of this policy under the Countryside and Rights of Way Act. Though no common rights are exercised on the land, I am informed that rights of access are still exercisable. Mr Hopkins advises that the common is used by local people for walking and horse-riding. The Council contends that access rights would be protected when detailed proposals are drawn up for the site, by way of a development brief. This, however, would not meet the objection of the CPRW and local people who consider that the landscape is valuable, offering extensive views of open land. The

Proposals Map of the UDP shows that the site is surrounded on three sides by the special landscape area, The Strategic Coalfield Plateau and its Associated Valley Sides. In my opinion, even if the rights of way were preserved within a new development layout, this would not safeguard the amenity value of those rights of access over an area of pleasant and open countryside. I would also expect development of the land for key employment plus retail purposes to have a significantly more harmful effect on the environment and amenity than a leisure park, golf course and retailing scheme as was permitted in the past.

7.4.18 The Council argues that the employment generation capabilities of this site outweigh the need to safeguard the site. I conclude that the site is an area of open countryside with acknowledged significance for nature conservation and amenity value to the local population. Though planning permission exists for a leisure park, golf course and retail uses, this has been renewed routinely for many years and there is scant evidence that it will be implemented. In my view, the case for an employment allocation on this site is poor and does not justify setting aside policies to protect the environment and local amenity. I shall recommend that the site is deleted from the list of key employment sites.

7.4.19 In view of my general conclusion, the proposed changes to para 5.5.5 agreed between the Council and Grantchester Plc, and the changes to the boundary of Sarn Park would not be needed.

**Recommendation**

7.4.20 I recommend that Policy E2(5) Sarn Park should be deleted from the Plan.

7.4.21 I recommend that changes to para 5.5.5 put forward in the PIMS should not be made.

7.4.22 I recommend that changes to para 5.5.5 and the Proposals Map (site boundaries) agreed between Grantchester and the Council should not be made.

7.4.23 I recommend that the reasoned justification in paras 5.5.3 to 5.5.6 of the UDP should be modified in the light of the deletion.

**7.5 POLICY E2  
Key Employment Allocations : Site Omission  
Brackla Tunnels, Brackla Industrial Estate**

**Objection**  
*Conditionally Withdrawn*  
*DO/50927/1007 Lloyd Associates Ltd*

**Issue**

7.5.1 This is whether or not land incorporating old underground tunnels, should be incorporated into the industrial estate under Policy E2(1).

**Conclusions**

7.5.2 The objection has been conditionally withdrawn on the basis that changes made in the PIMS to the boundaries of the industrial estate on Map Ref: A1 are made. I consider that

this extension to the industrial area would achieve a better separation of industrial activities and the proposed area of open space.

**Recommendation**

7.5.3 I recommend that the modifications proposed in the PIMS to the Brackla Industrial Estate boundary shown on Map Ref: A1 should be made.

**7.6 POLICY E2  
Key Employment Allocations : Site Omission  
Land off Heol Ffaldau, Brackla**

**Objection**  
*Conditionally Withdrawn*  
DO/50928/1011 LEL Properties Ltd

**Issue**

7.6.1 This is whether or not land off Heol Ffaldau should be included in the Brackla Industrial Estate rather than as amenity open space.

**Conclusions**

7.6.2 The objection has been conditionally withdrawn on the basis that changes made in the PIMS to the boundaries of the industrial estate on Map Ref: A1 are made. I consider that this extension to the industrial area would achieve a better separation of industrial activities and proposed open space.

**Recommendation**

7.6.3 I recommend that the modifications proposed in the PIMS to the Brackla Industrial Estate boundary shown on Map Ref: A1 should be made.

**7.7 POLICY E3.1  
Industrial and Commercial Allocations  
Abergarw Industrial Estate**

**Objection**  
DO/50999/1105 Droxford Limited

**Issue**

7.7.1 This is whether or not the site should be allocated for employment purposes, or allocated instead for housing.

## Conclusions

7.7.2 I conclude in my section 6.9 that this site should not be allocated for housing purposes. I agree with the Council that this site is an important component in the supply of industrial land, as it offers some immediately developable land, and complements the nearby Brynmenyn Industrial Estate. The site's planning history indicates that there have been expressions of interest for employment use. Whether or not the Bryncethin Bypass is built, I consider that the site has adequate highway access, and the advantage of proximity to the M4. I conclude that the site should be allocated for employment purposes.

## Recommendation

7.7.3 I recommend that no modification be made.

## 7.8 POLICY E3.14 Industrial and Commercial Allocations Land at Tondu

### Objection

DO/50880/938 Bridgend Biodiversity Partnership  
DO/50017/13 Rhys-Davies Services Ltd  
*Conditionally Withdrawn*  
DO/50017/12 *Rhys-Davies Services Ltd*

## Issues

7.8.1 These are:

- Whether or not the allocation would be seriously harmful to nature conservation;
- Whether or not comprehensive redevelopment with major infrastructure investment is necessary to realise the development potential of this site, and whether or not the employment allocation should be separated from the housing allocation, H1(51), without the preparation of a development brief and planning obligations.

## Conclusions

7.8.2 On the first issue, the Bridgend Biodiversity Partnership indicates that the allocation covers a strip of land belonging to the Glamorgan Wildlife Trust at Parc Slip Nature Park. The objection site is said to contain orchids and be one of only two sites in the County Borough for the scarce blue-tailed damselfly. The Council agrees that part of Parc Slip Nature Park lies within the regeneration area, which is a designated SINC, and would accept an amendment to the site boundary to exclude it. I consider that this would be desirable, to safeguard nature conservation interests.

7.8.3 Policies in the Environment chapter of the UDP require developers to take full account of any nature conservation resource, and retain natural features or habitats. Protected species and their habitats are to be safeguarded when development is proposed, but non-statutory nature conservation interests should not unduly restrict acceptable development. I consider that this allocation for employment uses is an important one, and conclude that it should not be deleted on the grounds that it might be harmful to nature conservation.

7.8.4 On the second issue, Rhys-Davies Services Ltd conditionally withdrew objection DO 50017/12, though no changes were made to the policy and supporting text in the PIMS.

7.8.5 Para 5.5.8 of the UDP advises that land at Tondu will require comprehensive redevelopment and major infrastructure investment. The Council indicates that a S106 planning obligation was agreed, to reserve the line of Maesteg Road, when planning permission was granted for housing development on a portion of the regeneration area. I am informed that an outline planning permission was submitted in 1997 for the comprehensive development of the regeneration area, including decontamination and reprofiling of much of the southern part of the site. These factors indicate to me that the concept of comprehensive redevelopment in this locality is not a new one, and that the need for investment in site preparation and new infrastructure has already gained some acceptance.

7.8.6 PPWales encourages mixed use developments in town centres and other appropriate places. They are promoted on sustainability grounds, reducing the need to travel (para 2.5.5), and in the context of designating land for employment needs (para 7.2.6). I agree with the Council that both the housing allocation and the employment allocation at Tondu Road are important elements in their respective land banks. The site is well located in relation to centres of population, the railway and bus services, so that it is suitable for both employment and residential uses. I disagree with the objector that there would be no functional linkage between future housing and employment uses, though I recognise that people do not necessarily choose to live next to their place of work.

7.8.7 In view of the complexity of the Maesteg Road, Tondu regeneration site with its Scheduled Ancient Monument, possible contamination and highway problems, I consider that a development brief would be desirable to integrate the elements of a mixed use scheme. The objector argues that parts of the site could be brought forward early in the Plan period without major investment in infrastructure. I see no reason why a phasing programme could not be incorporated into the development brief so that some elements might be developed ahead of others.

7.8.8 The Wyn Thomas Gordon Lewis Study of industrial sites in the County Borough concluded that development of the Tondu site would be socially beneficial, but was unlikely to be achieved quickly. However, it ranked the site as a medium term prospect, likely to be developed in 5-10 years. The consultants also commented that cross-subsidy with housing development would improve the financial viability of the employment site. This is contrary to the objector's argument that the requirement for comprehensive development of the regeneration site will adversely affect the viability of future schemes and prejudice the implementation of employment proposals during the Plan period.

7.8.9 The objector argues that the Council is failing to take account of land ownership considerations in promoting comprehensive development. I acknowledge that such considerations may inhibit the speedy redevelopment of this land. However, PPWales section 2.7 is relevant here, and requires a collaborative and proactive approach by stakeholders. It does not suggest that Councils should abandon the aim to secure redevelopment if collaboration is hard to achieve, but concludes that the use of compulsory purchase powers may have to be contemplated. Collaboration is likely to lead to the use of planning obligations. I agree with the objector that planning obligations should be achieved only through negotiations between landowners and the Council, and in accordance with WO C13/97. However, I consider that land ownership constraints are not sufficient reason to abandon this regeneration scheme.

7.8.10 I conclude that comprehensive redevelopment is desirable to realise the development potential of the regeneration site, and that the employment allocation should not be separated from the housing allocation, H1(51). I see no reason to delete the reference to Tondou from para 5.5.8 of the UDP.

**Recommendation**

7.8.11 I recommend that no modification be made to the policy or its reasoned justification.

**7.9 POLICY E3.20  
Industrial and Commercial Allocations**

**Objection**  
DO/51145/1317 Mr R Evans

**Issue**

7.9.1 This is whether or not Village Farm Industrial Estate boundaries are appropriately defined.

**Conclusions**

7.9.2 The objector argues that the Village Farm industrial estate has been enlarged to include a residential property and industrial land 'without apparent Council approval'. The industrial estate was allocated in the Ogwr Borough Local Plan, and the Council advises that it has revised the boundary in the deposit UDP so that it reflects more accurately the prevailing land uses. The Council confirms that a dwelling on the northern part of Plot 8 was permitted in 1996 on condition that it was occupied by the owner of the adjoining business. In these circumstances, I consider it reasonable for this dwelling to be included in the industrial estate.

7.9.3 The Council also explains that land west of Picton Press Ltd is under-used urban land, which has had planning permission in the past for retail uses. I see no reason why this should not be made available for industrial or commercial uses. I conclude that the boundaries of Village Farm Industrial Estate are appropriately defined.

**Recommendation**

7.9.4 I recommend that no modification be made.

**7.10 POLICY E3.21  
Industrial and Commercial Allocations  
Wern Tarw**

**Objections**  
Please refer to Appendix 1

## Issues

7.10.1 These are:

- Whether or not the allocation for employment use is compatible with other environmental policies in the UDP;
- Whether or not development of the site would be harmful to nature conservation, the quality of the environment and visual amenity;
- Whether or not the site is brownfield land.

## Conclusions

7.10.2 On the first issue, the Wern Tarw site is located in the countryside, beyond the confines of any settlement. New development here would be in conflict with aspects of the preferred land use strategy of the UDP and policies to protect the countryside, notably Policy EV1. However, planning permission was granted in 1978 for industrial purposes on the site, which is occupied by Rockwool Ltd (mineral insulation products). A further planning permission for an extension to existing processes was granted in 1997. The site is therefore committed for employment use and I consider that the future prospects of the business should not be compromised by the deletion of this allocation. I conclude that, though the allocation conflicts with policies to protect the countryside, this is outweighed by the site's importance to maintaining the local economy over the period of the UDP.

7.10.3 Turning to the second issue, the north-western part of the site which is currently undeveloped includes a SINC as identified in the Bridgend Local Biodiversity Action Plan. However, national planning policy indicates that non-statutory designations including SINC's should not unduly restrict acceptable development. The Council advises that all the site is in the ownership and control of Rockwool, and the only means of access to the undeveloped portion is from the existing plant off Wern Fawr Road. In practice, I consider it unlikely that the site will be developed separately from Rockwool, and this should limit the loss of open land, and other environmental harm. I conclude that there would be scope to contain the harm to nature conservation, the quality of the environment and visual amenity which could result from industrial development of the site.

7.10.4 On the final issue, employment site E3(21) Wern Tarw is described as a brownfield site in the UDP. However, objectors argue that part of this site and the neighbouring land at Wern Fawr is common land and greenfield. I consider that it would be misleading to describe this as a brownfield site, if the land which remains to be developed for employment uses has not been built on before, unless that land lies wholly within the curtilage of existing buildings and structures. I recommend that the Council should re-examine the categorisation of this substantial site in the light of the definition of brownfield sites in PPWales, and amend Policy E3, its footnote and text in para 5.5.8, if necessary.

## Recommendation

7.10.5 I recommend that Policy E3(21) should not be modified.

7.10.6 I recommend that the status of the site as brownfield land should be re-examined with consequent amendments to the footnote to Policy E3 and/or text of para 5.5.8, if necessary.

**Objections**

Please refer to Appendix 1

**Issues**

7.11.1 This is whether or not the allocation for employment use should be made.

**Conclusions**

7.11.2 The Council allocated the site at Wern Fawr in the Ogwr Borough Local Plan to increase the range of employment sites in close proximity to the strategic road network, and offer a site for major industrial development. However, PPWales advises that new development for enterprise and employment uses should be located and implemented in accordance with sustainability principles. I consider that this site in the countryside, at some distance from the main settlements, would be inconsistent with new national planning policy, and with policies in the deposit UDP which seek to protect the countryside.

7.11.3 Nearly 40% of the objection site is common land and parts of the site are of interest to nature conservation. The CCW and others argue that the loss of common land would be harmful and could have a knock-on effect on landscape and nature conservation in the wider area, as replacement land may have to be sought. The Coychurch Community Council highlights concerns about the possible harmful environmental impact from industrial uses on the nearby village of Heol y Cyw and on the surrounding countryside. The Council proposes in the PIMS to delete the Wern Fawr employment allocation from the UDP. I consider that this would be consistent with sustainable development and beneficial for the local environment.

7.11.4 Dunraven Estates and the Coal Authority object to the proposal in the PIMS to omit the site at Wern Fawr. They argue that the proposed modification to the UDP was merely a response to local objectors whose representations were not valid. However, I consider that the opposition of local people to the location of industry and commerce in a countryside location is reasonable and in accord with national planning policy.

7.11.5 The counter-objectors contend that conflict with Policy E27 relating to pollution and visual amenity would be a matter for development control. However, the existing industry at Wern Tarw is described as noisy by local people, and is said by the Council to have its emissions monitored. Policy E3 identifies sites for general industry and commerce, and there is a prospect that potentially polluting or unattractive industries might seek to locate at Wern Fawr if the land were allocated. I consider that the juxtaposition of land uses and the avoidance of harm to amenity are valid matters for consideration when preparing the UDP. The site is set in an area of pleasant countryside where, away from the existing factory, it would not be unreasonable to expect a clean and quiet environment.

7.11.6 The counter-objectors point out that the Wern Fawr allocation in the deposit UDP amounted to some 15% of the gross employment land allocation in the County Borough, and was the largest available site. The Wyn Thomas Gordon Lewis report on industrial sites (CD155) concluded that the site should be considered for investment in the medium to long term. However, in my view the UDP has identified an ample supply of employment land, with sufficient surplus to provide choice and variety for potential investors over the Plan period. In

sections 7.3 and 7.4, I comment further on the allocation and likely take up of industrial land. The Council demonstrates that, at December 2001, without the Wern Fawr site, there was some 324 has of available employment land to serve an anticipated take up averaging 10 has a year over the Plan period. The last reported land take in the County Borough as large as 50 has was the Ford Company at Waterton in 1978.

7.11.7 Dunraven Estates and the Coal Authority argue that the site is easily accessible from the Bridgend Valleys without the need to access the strategic highway network. However, I agree with the Council that the site is a long way from the Maesteg communities and is reached by a narrow and winding rural road from Bryncethin. I have taken account of the fact that land was allocated for employment use at Wern Fawr in the Ogwr Borough Local Plan and that funds have been spent on infrastructure to service the Rockwool area. However, I consider that the omission of this site would not be harmful to future economic development, and I conclude that the site should not be allocated for employment use.

**Recommendation**

7.11.8 I recommend that the UDP should be modified as proposed in the PIMS by the deletion of E3(22) Wern Fawr.

**7.12 POLICY E3.23  
Industrial and Commercial Allocations  
Former Bairdwear Factory, Pyle**

**Objection**  
DO/50985/1080 Cynffig Community Council

**Issue**

7.12.1 This is whether or not a new superstore should be located on the former Bairdwear Factory site.

**Conclusions**

7.12.2 Policy E3(23) allocates this site for employment uses under Use Classes B1 and B2 (business and general industrial). National planning policy and the UDP's Policy R1 seek to concentrate new retail development in established commercial centres. Policy E7 of the UDP seeks to protect identified employment sites from alternative uses including retail development. I consider that the objector's proposal would be in conflict with these soundly based policies, and see no reason why this allocated employment site should be used for a new superstore.

**Recommendation**

7.12.3 I recommend that no modification be made.

## 7.13

### POLICY E3

#### Industrial and Commercial Allocations : Site Omission Land at Island Farm, Bridgend

##### **Objection**

DO/51210/1682

Mr L Joseph

##### **Issue**

7.13.1 This is whether or not, as part of a mixed use development, land at Island Farm should be allocated for employment uses (B1 in Policy E3).

##### **Conclusions**

7.13.2 I have reported in Chapter 6, section 6.5, on the housing element of a proposed mixed use scheme based on a national facility for sporting excellence, which is put forward for land at Island Farm. The objector argues that the scheme would be of significant benefit to the local/regional economy, and that it could incorporate a 10ha employment area for B1 use as an extension to the Mid Glamorgan Science Park. For the reasons given in my Chapter 6, I do not recommend that the mixed use allocation should be made.

7.13.3 The schematic layout plan prepared for the objector indicates that the employment element would partly occupy land shown in the deposit UDP as special employment land in Policy E6, and partly land which is in the countryside. The objector wishes to see the land listed under Policy E3, but I see no reason for a different employment allocation from that contained in the UDP, of reduced size and which would encroach on the countryside.

##### **Recommendation**

7.13.4 I recommend that no change should be made.

## 7.14

### POLICY E3

#### Industrial and Commercial Allocations North of Abergarw Industrial Estate, Bryncethin

##### **Objection**

DO/50934/1019

Dr J R Anthony

##### **Issue**

7.14.1 This is whether or not the Abergarw Industrial Estate should be extended to the north-east, in the interests of promoting economic development.

##### **Conclusions**

7.14.2 The objector argues that the industrial allocation shown as E3(1) in the UDP should include additional land which was included in a planning permission in 1997. Permissions were granted for a new warehouse and screening, with landscaped mounding, on the current objection site (P/97/383FUL, P/97/605FUL and P/97/606FUL).

7.14.3 The Council advises that the construction of a warehouse on the E3(1) site was granted permission subject to a S106 obligation, which was not completed. The application has therefore been treated as withdrawn, and the objection site is part of a field used for grazing. In the Council's view, the proposal from a single user for such a large warehouse building on the site was unusual, and is unlikely to be repeated. I consider that the site, without the additional land to the north-east, would be satisfactory for a small or medium business user. In the absence of a large warehouse building, there would be no requirement for the landscaped mound on the objection site. The need to dispose of top soil before developing the site would not provide justification for creating such a mound, in my opinion.

7.14.4 The objection site is located in attractive countryside beside the River Ogmore. The UDP allocates an abundance of employment land for the Plan period, and I consider that there is no general need for additional provision. There is other industrial land in this part of the County Borough to which a user requiring a large site might be directed in future. I conclude that an extension to this industrial site is not necessary and would be harmful to the countryside.

## Recommendation

7.14.5 I recommend that no modification be made.

## 7.15 POLICY E3 Industrial and Commercial Allocations : Site Omission Land off Pont George Road, Pyle

### Objection

DO/51214/1724      Davies Bros (Waste) Ltd

## Issue

7.15.1 This is whether or not the site should be allocated for employment use.

## Conclusions

7.15.2 The objectors argue that this site, on the fringe of Kenfig Hill and Pyle, is suitable for employment use and could widen the range and choice of sites locally. However, the Council has identified a substantial employment land bank in excess of 300has, which should more than adequately cater for expected future demand in Bridgend County Borough. I consider that there is a sufficient supply of industrial land in this part of the County Borough, much of it suitable for small businesses.

7.15.3 Though the objectors describe the site as urban fringe and of marginal agricultural value, I agree with the Council that the railway line forms a discernible northern boundary to the urban area in this locality. The site is therefore located in the countryside, where new development should be strictly controlled. I have taken account of the argument that the proposal to develop this site would help the farming economy. However, no further details are given so that this does not outweigh my conclusion that the site should not be allocated for employment use.

## Recommendation

7.15.4 I conclude that no modification should be made.

### 7.16 POLICY E3 Industrial and Commercial Allocations : Site Omission East of Rockwool, Wern Tarw

#### Objection

DO/50951/1036 Mr D Djukic

## Issue

7.16.1 This is whether or not this site should be allocated for employment land.

## Conclusions

7.16.2 The objector argues that the land is suitable for employment use and would provide a natural extension to the adjoining Rockwool site allocated under Policy E3(21). The land is described as very poor quality grazing, which suffers from fly tipping and vandalism. However, the site is located in the countryside and is detached from any of the main settlements of the County Borough. Though the Rockwool business occupies a similar location, that was granted planning permission many years ago, before current policies which promote sustainable development in order to make the most efficient use of urban land, safeguard the countryside and minimise the need for motorised travel were in place.

7.16.3 I consider that development of this objection site for employment purposes would be in serious conflict with the principles of sustainable development which underlie national planning policies and those in the deposit UDP. In addition, the UDP identifies a more than adequate supply of land for future employment uses. I therefore conclude that the site should not be allocated for employment land.

## Recommendation

7.16.4 I recommend that no modification be made.

### 7.17 POLICY E4.4 Small Business Allocations Maesteg RFC Ground

#### Objection

*Conditionally Withdrawn*  
DO/51159/1359 *Morbaine Ltd*

## Issue

7.17.1 This is whether or not the allocation under E4(4) should be deleted, and the site included in a key retail redevelopment site.

## Conclusions

7.17.2 The Council proposes in the PIMS to delete allocation E4(4), The Cornstores, Maesteg, from the list of small business allocations and the objection has been withdrawn on condition that this change is made. I have recommended in Chapter 9, that land adjacent to Maesteg RFC Ground should be allocated as a key retail redevelopment site. In this context, and bearing in mind that the UDP identifies a substantial and varied portfolio of industrial sites, I conclude that the E4(4) allocation should be deleted.

## Recommendation

7.17.3 I recommend that Policy E4 should be modified as shown in the PIMS.

7.17.4 I recommend that the Proposals Map (PIMS Map D2) and Appendix EMP1 of the UDP should be modified accordingly.

## 7.18 POLICY E6 Protection of Special Employment Allocations

### Objections

DO/51052/1177	Mrs B E Bevan
DO/51052/1178	Mrs B E Bevan
DO/50330/354	Mr M S Conlon
DO/50330/355	Mr M S Conlon
DO/51053/1179	Mrs J Halse
DO/51053/1180	Mrs J Halse

## Issue

7.18.1 This is whether or not a broader range of land uses should be permitted on the identified Policy E6 sites.

## Conclusions

7.18.2 The objectors argue that, although the deposit UDP identifies five special employment sites, and states that these 'are reserved specifically for high technology business and manufacturing, research and development and prestige office development, and for no other purpose', these conditions are already being relaxed. They point to housing development permitted on the Triangle site, Pencoed, and a proposed rugby centre of excellence under consideration for Island Farm. In the interests of fairness, the objectors contend that housing and leisure developments should be permitted on the other sites.

7.18.3 The Council replies that the continuing success of Bridgend depends upon its ability to promote economic development and attract inward investment. A recent study of industrial sites in the County Borough by Wyn Thomas/Gordon Lewis et al, commissioned jointly with the WDA (CD155), found that most of the sites designated under Policy E6 had potential for development within the Plan period. PPWales recognises the need for local authorities to keep an industrial land bank, and advises that sites designated for industrial development should not be used for other single purposes such as retail, leisure or housing development.

7.18.4 I consider that the Council should maintain a sizeable employment land bank, so that it can respond to a range of requests for land from external sources and from local businesses. I have already concluded (my Chapter 4) that there is sufficient housing land allocated in the UDP, and national planning policy favours the siting of major retail and leisure development in existing town centres. I see no need therefore to permit these types of development on the allocated special employment sites. Though many of these sites have been available for employment use for several years without being developed, I accept that this protracted timescale is a feature of the employment land market.

7.18.5 The employment land bank has to be responsive to changes in the structure of the economy. Evidence to the Bridgend UDP Inquiry indicates that a shift away from inward investment projects in traditional manufacturing towards more IT and office development is likely. A call centre has been attracted to the E6(2) site. I consider that other E6 sites, close to the Sony development and Bridgend Science Park, should be well placed to cater for similar new investment opportunities.

7.18.6 I agree with the objectors that the recent planning permission for housing and employment development at The Triangle site, Pencoed, is inconsistent with Policy E6 which is specific about the permitted uses and adds 'and no other purpose'. However, I consider that it should not justify the inclusion of housing and other uses on other Policy E6 sites.

7.18.7 I also agree with objectors that the reasoned justification for this policy is unclear, especially where it states : 'and will be protected from piecemeal development of uses which could locate elsewhere'. I am also unsure what is meant by 'prestigious developments' and 'high quality end-users' in para 5.6.2, and consider the phrases to be unhelpful and vague. National planning policy seeks to promote the efficient use of urban land and good design everywhere, so that I question whether this policy should be explicitly for 'those businesses who demand high quality, low density, landscaped environments.'

7.18.8 In para 5.6.4, it is suggested that some sites could be suitable for a single user, and attention is drawn throughout the text to accessibility to the M4 motorway. In my view, all this blurs the distinction between the sites identified in Policy E2 and those in E6. I consider that the reasoned justification should be re-written, so that it describes this policy more clearly and explains how, if at all, these sites differ from those allocated in the key employment site policy.

7.18.9 I am also concerned that there is a potential conflict between Policy E6, which allows 'prestige' office development in these locations which are all peripheral to the main settlements, and Policy E10 which indicates that office developments should locate in town centres or satisfy the sequential test. 'Prestige' is not defined in the UDP, which is therefore not providing certainty to prospective developers. In my opinion, the town centre of Bridgend will not be revitalised as long as footloose office development is able to occupy edge of town, greenfield sites. However, if office development is functionally linked to buildings for high technology business and manufacturing, research and development, then it would be reasonable for it to be located alongside. I conclude that the Policy E6 sites should be allocated wholly for employment land uses, and that their role in the employment land bank should be explained more clearly.

7.18.10 In the PIMS, the Council proposes an amendment to Policy E6 and the text in para 5.6.4 so that they refer to 'Pencoed Technology Park' instead of 'Sony Technology Park'. I consider that this should be changed to signal the site's general availability.

## Recommendation

7.18.11 I recommend that Policy E6 be modified by a change to the end of the first sentence as follows: ‘...for high technology business and manufacturing, research and development and related office development, and for no other purpose.’

7.18.12 I recommend that the references to Policy E6(4) in the policy and the supporting text be modified as shown in the PIMS.

7.18.13 I recommend that the reasoned justification be amended along the lines outlined in para 7.18.7 & 7.18.8 above.

## 7.19 POLICY E6.1 Protection of Special Employment Allocations Bridgend Science Park/Island Farm

### Objections

DO/51050/1170

Campaign for the Protection of Rural Wales

DO/51210/1683

Mr L Joseph

## Issues

7.19.1 These are:

- Whether or not the land should be allocated for industrial development;
- Whether or not the land allocated for special employment use should be included in a comprehensive development scheme and the Policy E6 allocation deleted.

## Conclusions

7.19.2 On the first issue, though this site has been available but largely undeveloped for employment use for many years, I consider that it is an important part of the County Borough’s employment land portfolio. A recent report by King Sturge on economic trends and prospects in Bridgend describes the ongoing structural changes in the economy and the movement away from major manufacturing towards IT and service industries. In my view, the Island Farm site next to Bridgend Science Park is sufficiently well related to the strategic road network and the main settlement of Bridgend, to offer an attractive site for high technology or research based businesses.

7.19.3 Though the land south of the A48 is pleasant and open countryside, it is outside the Merthyr Mawr landscape conservation area. I acknowledge that the site is peripheral to the urban area of Bridgend, and could require improved access especially by public transport for it to succeed. However, I conclude that the special employment allocation should not be deleted at this site.

7.19.4 On the second issue, Mr Joseph proposes a mixed use development based on a national academy of sporting excellence, on a site which would include the E6(1) land and land to the south. I conclude in Chapters 3 and 6 that neither the housing element nor the mixed use scheme should be taken forward in the UDP. As part of the overall scheme, the objectors propose B1 uses and listing under Policy E3 on 10has of land in the east. This would extend

south of the UDP Policy E6 site and replace it. However, I see no reason for the current allocation to be abandoned in favour of a more general, smaller land allocation under Policy E3.

**Recommendation**

7.19.5 I recommend that no modification be made.

**7.20 POLICY E6.5  
Protection of Special Employment Allocations  
Ty Draw Farm, Pyle**

**Objections**

DO/50963/1050 Mr F L Smith

**Issue**

7.20.1 This is whether or not the site should be allocated for special employment purposes.

**Conclusions**

7.20.2 The objector argues that the site should be used for housing and not for special employment purposes. The site has been marketed for employment purposes since 1982, with limited interest from developers. At the Kenfig Hill/Pyle Local Plan Inquiry in 1986, the Inspector concluded that the site would be equally suitable for housing or employment use, but he recommended that it should be allocated for special employment use. The draft deposit version of the UDP showed the site as a housing allocation.

7.20.3 The Council argues that, if this site is withdrawn from the employment land bank, there will be a dearth of developable sites on the west side of the County Borough, which will be in conflict with sustainability. It also argues that employment use would contribute to the economic and social regeneration of a deprived part of the County Borough. However, I agree with the objector that the Village Farm estate, which has some available land, provides opportunities locally for industrial and commercial enterprise. In addition, there are a number of other special employment sites available to investors in the County Borough.

7.20.4 I have considered a similar objection to this one brought by the WDA and I report my conclusions in Chapter 6, section 6.32. I conclude that the site should not be allocated for special employment uses.

**Recommendation**

7.20.5 I recommend that the site should be deleted from Policy E6.

7.20.6 I recommend that the Proposals Map be changed in accordance with my recommendation in Chapter 6, section 6.32.

**Objections**

DO/51188/1433	B & Q
DO/51227/1791	Harmer Partnership
DO/51203/1555	House Builders Federation
DO/50017/14	Rhys-Davies Services Ltd

**Issue**

7.21.1 This is whether or not the policy should (a) offer greater flexibility for other uses on employment sites, including housing, retail and leisure, and (b) allow for the release of identified employment land where it is no longer needed to provide a range and choice of such sites.

**Conclusions**

7.21.2 Government advice is against the amassing of employment land banks which cannot realistically be taken up in the lifetime of the UDP. The Council advises that it has assessed its employment land availability in preparing the UDP, and draws attention to a number of changes made since the Ogwr Borough Local Plan was adopted, to reduce the employment land supply. In addition, I have recommended that sites at Sarn Park and Ty Draw Farm should be taken out of the portfolio. With the Council's proposed amendment in the PIMS to delete the site at Wern Fawr, all these changes would reduce the employment land bank from some 370has shown in the deposit UDP to about 260has.

7.21.3 When allowance is made for the fact that the lead-in time for industrial and commercial development may be protracted, and that the market for employment land requires a variety of sizes and types of site to be available, I consider that the remaining allocations would not be excessive. I consider that it is reasonable to protect the employment land bank because of the character of employment land markets, and because of the considerable pressure on developable land for new housing and retail uses. In my opinion, the continuing availability of the remaining land bank will be essential to the future economic development and prosperity of the County Borough.

7.21.4 PPWales para 7.2.7 favours industrial development separately from retail, leisure or housing. Policy E7, in my opinion, makes adequate provision for ancillary and *sui generis* developments on industrial estates. B & Q Plc argues that the criteria in the policy should be extended, partly to achieve the replacement of industrial uses which are harmful to character and amenities. However, the Council points out that only designated employment sites are covered by the policy, and the replacement of inappropriately located or unneighbourly uses outside the defined employment sites is not prevented. I see no need for the new criteria put forward by the objector.

7.21.5 I have concluded in Chapter 4 that there is no need to identify additional housing sites in the UDP. However, I have recommended that two areas allocated for employment use at Ty Draw Farm, Pyle and Wyndham Close, Brackla, would be more suitable for housing purposes. Significant retail and leisure developments should be located in town centres, and the sequential approach followed if no such suitable sites are available. I consider that policies to promote existing centres in the UDP could be undermined if a more flexible approach were taken to employment sites, as the objectors are seeking. I conclude that the policy should not be changed.

## Recommendation

7.21.6 I recommend that no modification be made.

## 7.22 POLICY E8 Unallocated Employment Sites

### Objection

DO/51229/1859 National Assembly for Wales

## Issue

7.22.1 This is whether or not the policy should be included, especially in the light of the Departure Procedures which deal with unforeseen circumstances and needs arising after the Plan has been adopted.

## Conclusions

7.22.2 The NAW argues that substituting land which may be physically unsuitable for development or capable of development only beyond the Plan period, or releasing land to meet unforeseen needs, are not substantive bases for policy criteria. I consider that the policy introduces vagueness about the decision-making process, and should be unnecessary as the Council has allocated an abundance of employment land and has re-assessed the suitability of the sites.

7.22.3 National planning policy does not exempt industry and commerce from conformity with UDPs or sustainable development principles. However, I appreciate that the Council does not wish to lose opportunities for the expansion of its economic base. It seems to me that businesses encountering the problems described in this policy and reading the UDP should understand that the Council is committed to the promotion of economic growth and prosperity. The Departure Procedures are designed to deal with the circumstances envisaged in this policy. I consider it unlikely that the absence of this policy would be harmful to the local economy, and conclude that the policy should be deleted.

## Recommendation

7.22.4 I recommend that this policy be deleted.

## 7.23 POLICY E9 Brownfield Sites in Urban Areas

### Objection

DO/51209/1658 Countryside Council for Wales

## Issue

7.23.1 This is whether or not there is a need for a general policy setting out criteria, including amenity, against which the value of brownfield land might be assessed.

## Conclusions

7.23.2 The objector does not indicate whether it seek extensions to the criteria in this policy, or a replacement policy which would cover all development proposals (not just those for employment purposes) on brownfield land. The preferred land use strategy of the UDP attaches much importance to the re-use of previously developed land in urban areas and, in my opinion, re-use for employment purposes should be encouraged. The supporting text in paras 5.8.4 to 5.8.6 explains how this policy could promote sustainable development and enhance visual amenity. I agree with the Council that it would be unnecessarily repetitive to extend the criteria in this policy. Aspects of impact on amenity are adequately dealt with in policies in the UDP's Environment chapter. I conclude that the policy should not be changed or enhanced as the objector proposes.

## Recommendation

7.23.3 I recommend that no modification be made.

## 7.24 POLICY E10 Office Development

### Objection

DO/51144/1325 Grantchester Plc

## Issue

7.24.1 This is whether or not the key employment sites, notably Sarn Park, should be identified as suitable for office development.

## Conclusions

7.24.2 Grantchester Plc accepts the benefit of locating offices within town centres where suitable sites and premises exist. However, it is argued that a more flexible approach should be adopted if opportunities for inward investment are to be maximised, and attention is drawn to the fact that 'prestige office development' would be permitted by Policy E6 on the special employment sites.

7.24.3 I have already recommended in section 7.18 above that a strict approach to office development on the special employment sites should be adopted. I consider that support for Bridgend town centre and the other district centres is critical for the future sustainable development of the County Borough, and every effort should be made to direct new investment for appropriate uses, including office development, there. The recent planning permission on the former Courage Brewery site demonstrates that there is demand for town centre/edge of centre sites. The policy for established centres and the underlying preferred land use strategy for the UDP are likely to falter, in my opinion, if allocations for speculative office development outside the main settlements are made.

7.24.4 The objectors seek a change to para 5.8.8 of the UDP to indicate that 'major prestige office development whose particular locational requirements and scale of operation are unlikely to be met in Bridgend town centre' would be permitted at Sarn Park. Grantchester Plc are prospective developers for a mixed use development at Sarn Park, shown as a key

employment site in the deposit UDP. However, I consider it to be particularly important for large office development schemes to comply with Policy E10, if it is to serve any purpose. I am unable to support the proposed changes to the reasoned justification for Policy E10 in para 5.8.8, which were agreed between Grantchester and the Council in the course of the Inquiry. I conclude that the key employment sites, notably Sarn Park, should not be identified as suitable for office development.

### Recommendation

- 7.24.5 I recommend that no modification to the policy be made.
- 7.24.6 I recommend that the proposed changes to para 5.8.8 put forward in a statement agreed between Grantchester Development Properties Ltd and the Council should not be made.

## 7.25 POLICY E12 Home Working

**Objection**  
DO/51227/1792 Harmer Partnership

### Issue

- 7.25.1 This is whether or not the policy and its reasoned justification should make clear that planning permission is often not required for operating a small business from home.

### Conclusions

7.25.2 In view of the likely increase in people working from home, the Council wishes to adopt a precautionary stance, so that harmful developments do not result. However, permission is not normally required where the use of part of a dwelling for business purposes does not change the overall character of the property's use as a dwelling. I accept that it may be a matter of fact and degree as to whether business operations at a dwelling have so grown or intensified that they are no longer ancillary and a material change of use has occurred. However, I consider that the UDP, particularly the supporting text, could give clearer guidance to the interested reader as to when planning permission is and is not required. In my view, using the word 'unacceptable' in criterion 3 would not resolve the matter satisfactorily.

7.25.3 I also consider that the policy should address only those circumstances where the business activities would require planning permission, and it should spell out the criteria which would make an application acceptable or unacceptable. The first criterion should require only no harm to the residential character and appearance of the property. I conclude that the text should be amended to clarify that home working often does not require planning permission, and that the policy should concentrate on the tests to be applied when planning permission is needed.

### Recommendation

- 7.25.4 I recommend that criterion 1 of the policy should be re-written as follows: 'There would be no adverse impact on the character and appearance of the dwelling;'.

7.25.5 I recommend that para 5.8.15 be modified to clarify that home working frequently does not necessitate planning permission, and to explain briefly the circumstances when an application should be made.

## 7.26 POLICY E13 Polluting Industries

### Objection

DO/51227/1793 Harmer Partnership

### Issues

7.26.1 These are:

- Whether or not the policy should adopt a positive stance;
- Whether or not the reference to Environmental Impact Assessment is appropriate.

### Conclusions

7.26.2 On the first issue, I have had regard to the Council's General Proof 1 on Policy Formulation, Function and Phraseology (CD147). This indicates that it is good practice to frame policies positively where there is a choice, but never to do this to a restrictive policy. Section 10 of General Proof 1 is critical of qualifying words such as 'unacceptably', although 'unacceptable' is used in this policy.

7.26.3 PPWales section 13.11 advises that Plans should include policies on the location of potentially polluting developments and should set out the criteria by which applications for such development will be determined, but not exclude provision for such projects. I have looked at the wording of the policy with these points in mind, and I consider that it could usefully be re-written in a positive fashion without losing its impact. I have taken account of the objector's proposed amendment, but have sought to stay closer to the original UDP wording, bearing in mind the role of other regulatory agencies than the planning system.

7.26.4 On the second issue, Environmental Impact Assessment (EIA) is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 1999. These provide that an EIA be carried out for all Schedule 1 development, and for Schedule 2 development which is likely to have significant environmental effects because of factors such as its nature, size or location. WO C11/99 (CD11) provides further guidance on those circumstances in which an EIA would be required. The Council indicates that it will err on the side of caution when exercising its discretion and deciding whether or not an EIA is required, but will 'invariably' ask for one. I consider that the bald statement currently made in para 5.9.2 could convey the impression that the Council, notwithstanding its stated intention to consider each case on its merits, might not always assess whether or not the 'significant environmental test' is met. I accept that the Council should take a cautious approach, but consider that the use of EIA should be explained more fully to show that a rational and fair approach will be followed.

## Recommendation

7.26.5 I recommend that the policy should be modified, so that it reads: 'Industrial developments which might cause pollution or pose a risk to health and safety will only be permitted if it can be demonstrated that industrial operations, and any emissions, can be monitored and controlled to meet environmental quality standards and objectives.'

7.26.6 I recommend that the last sentence in para 5.9.2 be expanded to explain more fully the circumstances in which the Council will ask for an EIA.

## 7.27 POLICY E14 Hazardous Industries

### Objections

DO/51227/1794

Harmer Partnership

DO/51049/1168

Health and Safety Executive

## Issue

7.27.1 This is whether or not the policy should allow for proposals for hazardous industries to be considered and permitted where safeguards can be put in place.

## Conclusions

7.27.2 The Council argues that the County Borough is highly urbanised with allocated employment sites well related to established residential areas. Para 5.9.6 of the UDP, as proposed for modification in the PIMS, indicates that there are no industries subject to the Control of Major Accident Hazards (COMAH) Regulations in the County Borough, which implies that this restrictive policy would pose no significant harm to the development of the local economy.

7.27.3 However, section 13.11 of PPWales offers support to the objection by the Harmer Partnership that proposals should at least be considered, and permitted if safeguards can be provided. The preferred land use strategy is to concentrate new development in the main settlements and avoid encroachment into the countryside. In my view, this would enable the Council to adopt a restrictive approach, consistent with the precautionary principle to refuse proposals likely to lead to serious environmental damage. I shall recommend a revision to the policy to make clear that relevant proposals would be properly assessed but safeguards preserved.

7.27.4 The Health and Safety Executive advises that the CIMAH Regulations have been superseded by the COMAH Regulations and that changes to the text in paras 5.9.5 and 5.9.6 are required to reflect them. I consider that the amendments put forward in the PIMS satisfactorily address this matter.

## Recommendation

7.27.5 I recommend that the policy should be modified as follows: 'Proposals for industrial development to import, store, manufacture, incinerate, dispose of or distribute hazardous substances will be closely scrutinised. Those which pose a threat to people, property

or the environment will not be permitted unless mitigation measures to remove or overcome the threats can be put in place and thereafter maintained.'

7.27.6 I recommend that the text in paras 5.9.5 and 5.9.6 be amended as shown in the PIMS.

## 7.28 POLICY E15 Notifiable Installations

### **Objection**

DO/51049/1169 Health and Safety Executive

### Issue

7.28.1 This is whether or not the Proposals Map should show the locations of notifiable installations and their associated consultation areas.

### Conclusions

7.28.2 The Health and Safety Executive argues that this proposed amendment could avoid speculative or ill-informed proposals, or contribute to mitigation of the consequences following a major accident. However, development in the vicinity of notifiable installations is controlled by health and safety legislation separate from the planning system. The Proposals Map already contains an abundance of information and should not, in my view, be overburdened with these new features. I agree with the Council that the best approach to disseminate the relevant information is through vigilant development control and prompt consultation with the objector. I shall not recommend a change to the Proposals Map.

### Recommendation

7.28.3 I recommend that no modification be made.

