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INTRODUCTION

The Local Development Plan process is new and Bridgend Town Council (BTC), although it has sought advice as to the hearing procedure and attended the pre hearing (notes of the pre hearing have been provided), it wishes to present the following observations to support its previous submissions which also reflect the concerns of local people. This submission concerns (1) the development of Island Farm particularly the impact on local residents and businesses and (2) the allocation of Green Wedge status. BTC submissions concerning Coity Sidings and the possible allotment status are dealt with elsewhere. The following observations follow the Inspector's 'Agenda with Matters and Issues' format using the Inspector's paragraph numbering and headings.

1 ALLOCATION STATUS

Land Use

- 1.2. The HD Ltd argument that there is a plentiful supply of employment land elsewhere in the County Borough has an equal and opposite corollary in relation to some of the options associated with the term "mixed uses".

Employment

- a) BTC maintain that the 'strategic' use of mixed use development throughout the County Borough will be seriously affected should the Inspector agree with HD Ltd. Their point is just based upon 'employment land' and the assertion that it should "reflect the current planning status (P/08/1114/OUT) of the site". The current status is a conditional planning permission with a Section 106 Agreement yet to be discharged in fundamental ways.
- b) Some of the 'mixed' use elements may be 'commercial', housing' a number of use delivering high quality sustainable places delivering new homes, work places and facilities. The PLA3 Schemes extend to twenty individual areas. BTC consider that the PLA3 strategic approach of the LPA could be made unsound if the 'mixed' use allocation is agreed at Island Farm without compensatory reductions elsewhere in the County Borough.
- c) In addition to the PLA3 context such a 'mixed' use allocation at Island Farm would have impact upon local infrastructure such as the regional nature of the A48, primary and secondary education, environmentally and the recreational need of the local population. BTC in coming to this opinion have to assume that the HD Ltd intention is not to anticipate employment uses but the other land uses associated with 'mixed' use such as housing, commercial use etc as envisaged in REG5 Local Retailing and Commercial Development and COM1 Residential Allocations in the Strategic Regeneration Growth Areas.

Housing

- a) It seems that HD Ltd considers that employment uses are subordinate. BTC can assume that 'housing' uses would be primary not least for

financial investment reasons. The Strategic Policy SP 12 – Housing in relation to housing is;

“Provision will be made for the development of 9,000 new dwellings in Bridgend County Borough up to 2021 which will be distributed in accordance with Strategic Policy SP1, Regeneration-Led Development. The new dwellings will be delivered in the following

5 year periods:

2006-2011 1,940 dwellings

2011-2016 2,681 dwellings

2016-2021 4,379 dwellings

An appropriate mix of dwelling size, type and tenure including approximately 1,310 units of affordable housing will be delivered through the planning system to meet the needs of the County Borough.”

- b) The plentiful supply argument that HD Ltd puts forward for employment land also applies to housing land and the inspector’s attention is drawn to Policy COM1 Residential Allocations in the Strategic Regeneration Growth Areas and the following paragraph;

6.1.8 The scale of new proposals have been based on an appraisal of the locations to determine their suitability to accommodate growth having regard to existing social and physical capacity, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary additional social or physical infrastructure.

- c) Additionally the assumed capacity of the Island Farm site in terms of housing based upon;

Policy COM4 Residential Density On sites exceeding 0.15 hectares in size new residential developments will be built at a density of at least 35 dwellings per hectare. A lower density level may be accepted as a requirement of design, physical or infrastructure constraints or where it can be demonstrated there is a particular lack of choice of housing types within a local community.

COM4 suggests that the volume of houses would be in the region of 910 on the whole site or 385 on the 11 ha of employment land.

- 1.3. In relation to the Inspector’s question Qn1d BTC is aware that the land the subject of control by BCBC was the subject of a Land Reclamation scheme by the Welsh Development Agency (WDA) which contained a proviso (possible a charge upon the land) that upon development of the site for the intended purposes that a significant sum of capital from the proceeds would have to be returned to them. It is understood that the sum was approximately £3.6M.

- a) Although the WDA has been removed by the Welsh Government (WG) BTC assume that the WG will want to recover the amount in the interest of public funding and its own fiduciary responsibilities

- b) The Inspector's attention is also drawn to the comments of the Sustainability and Environment Evidence Division in relation to P/08/1114/OUT below.

"In accordance with the remit as described at Annex C2 of Planning Policy (Wales), Technical Advice Note (Wales) 6, SEED OBJECTS to the development of 26 hectares of best and most versatile agricultural land contained within the planning application boundary (i.e. the land lying outside UDP policy E6(1)), on the basis that the loss of this agricultural land has not been justified by the procedure required by Planning Policy Wales paragraph 2.8.1."

BTC requests for the arguments outlined above that the Inspector considers that should the HD Ltd request to de-allocate Island Farm from SP9 to PLA3 be approved it would deflect the strategic approach of BCBC and destabilise the soundness of the LDP.

2 ROAD ACCESS

- 2.1 Bridgend Town Council (BTC) refer the Inspector to not only is the P/08/1114/OUT proposal development-led in the context of the new road from PLA8(5) but that Bridgend County Borough Council (BCBC) through the Regional Transport Plan (RTP) March 2012 has an additional implication providing associated effects on the A48 which is referred to in Table 1 below.

Table 1: RTP A48

Schemes		Cost
Road Schemes: (to be implemented within the 5 year programme)		
A48 Broadlands Roundabout Improvements	Feasibility study complete, est. cost £750,000	£750,000
A48 Ewenny Roundabout Improvements	Feasibility study complete, est. cost £1,000,000	£1,000,000
A48/A473 Waterton to Laleston dualling	Ewenny to Redhill, study complete, est. cost £7,000,000 Awaiting study from Waterton to Ewenny.	£7,000,000
		£8,750,000

The South East Wales Transport Alliance (SEWTA) categorisation

At paragraph 5.8.2 SEWTA describes the A48 / A473 Waterton to Laleston dualling as a key problem in the regional road network, including A48 Broadlands Roundabout Improvements • A48 Ewenny Roundabout Improvements.

- 2.2 BTC is aware through its consideration of the consultation regarding P/08/1114/OUT that the Heads of Terms for the Section 106 Agreement contained the following;

3. HIGHWAY WORKS The required highway works referred to in 1. above are detailed below:-

"(b) INTERNAL SPINE ROAD AND ASSOCIATED JUNCTIONS, LINKING A48 TO B4265 The owner shall complete to Base Course standard Phase 1(b) of the development as shown on the drawings C7811/202 rev R1 and

C7811/203 rev R2 or any successor drawings prior to the beneficial occupation/use of any other phase of the development. The owner shall offer the road for adoption by the council on completion of the final wearing course.”

BTC therefore disagrees with the response of the Council at paragraph 2.2 of the Agenda because the mitigation could be considered because the road alignment was part of the P/08/1114/OUT application and report to the Development Control Committee.

Spine Road

The LDP at paragraph 3.3.37 states;

***3.3.37** Land at Island Farm, Bridgend is identified as a Strategic Employment Site (SP9(2) refers), which is based on a number of requirements, one of them being that it is highly accessible from the M4 corridor. To provide this effective access, and thereby conform to the requirements of the highway network, the development of the site will require a new junction to be constructed on the A48 at a location which will affect, and have to include junction facilities for, Merthyr Mawr Road (North and South of the A48). Therefore, careful consideration must be given to this development to ensure that it introduces mitigation to overcome any adverse effect on the efficiency of the surrounding highway network.* ^[BTC underlining]

BTC suggest the wording underlined in paragraph 3.3.37 is amended to include the mitigation of residential and environment amenity of the local residents.

Additionally BTC is also aware that a local business located at the Science Park has significant business concerns,

Photronics (UK) Ltd (Robert Lloyd) 1 Technology Drive. Submitted the following OBJECTION in relation to P/08/1114/OUT

I am strongly opposed to this development which I feel would compromise the business operations of Photronics at its Science Park location.

We manufacture photo masks and are a key supplier to all the main semiconductor companies in Europe. Photo masks are quartz plates that contain microscopic images of electronic circuits that are used as master images in the manufacture of semiconductor wafers. The capital cost of the equipment used to manufacture photo masks is in excess of £60M and this equipment is particularly sensitive to ground vibrations.

Routing heavy traffic in close proximity to our building is a serious cause for concern. Installing anti-vibration equipment would be extremely disruptive and expensive and impractical to do after the event. All our multi-million pound equipment is at their final manufacturing location and we run a 24/7 operation. This aspect of the Science Park development could impact our product quality and yields with all subsequent knock-on effects.

Further issues of concern are building security due to the open plan nature of the Science Park, which would again be compromised with this development for obvious reasons.

A final concern is that we have daily couriers collecting our photo masks to take to airports to make extremely time critical deliveries. Our customers frequently place orders with a next day delivery where every hour can be vital to delivering on time. If

the site roads are congested due to activities at the proposed sporting development then that could incur late deliveries and loss of business to Photonics.

3 SITE OF IMPORTANCE FOR NATURE CONSERVATION (SINC)

No Comment

4 GREEN WEDGE

BTC support the Island Farm Campaign for Action (IFCA) regarding its submissions regarding Green Wedge allocation with the following observations. The issue of the extent of the 'settlement boundary' is referred to by the Inspector at paragraphs 1.2 Allocation Status, Qn1f, 4.1, 4.2, Qn4c and Qn4d.

Settlement Boundary

- a) The additional concern that BTC have is the HD Ltd desire to see the extension of SP9 up to the New Inn Road. The settlement boundary considered in the LDP Policy PLA1 - Settlement Hierarchy and Urban Management and BTC considers that following LDP paragraph is crucial; 3.1.18 All settlements in the settlement hierarchy have defined settlement boundaries. These have been reviewed and amended where appropriate to accurately define the urban area from the countryside. This provides certainty and direction in terms of where appropriate development will be permitted; encouraging the re-use of land and buildings and protecting the countryside from inappropriate development that may have an adverse effect on its rural character. It also assists in the prevention of the coalescence of settlements and avoidance of urban sprawl which enables communities to operate efficiently. ^[BTC underlining]
- b) In addition;**
- 4.1.7** *The countryside, for the purposes of the LDP, is defined as land lying outside of the designated settlement boundaries (defined by Policy PLA1). A number of site specific proposals in the LDP are located outside of these boundaries. Although these allocations are located in the countryside, there would be a general presumption in favour of their development for the specific purposes of their designation, subject to satisfying other policies in the plan.*
- 4.1.13** *The Council acknowledges that the rigorous application of settlement boundaries as limits to urban built development, as defined in Policy PLA1, will achieve most of the aims listed above. However, the Council considers that, due to the proximity of some neighbouring settlements and/or development pressure, some areas of countryside are more vulnerable than others in terms of coalescence with one another. Therefore, in the LDP the overriding purpose of the Green Wedge allocations is for their primary function, namely to prevent the coalescence of settlements.*
- c) BTC is very concerned and opposed to the extension of the settlement boundary requested by HD Ltd (which includes other land in their

ownership referred to in (Representor 1248 pages 1 – 5 extending to Llanerch Residential Home, Craig-y-Parcau and Ty Afon former boys home and outbuildings) in that valuable countryside used and valued by the citizen of Bridgend is unnecessarily compromised.

Background Paper 4 Green Wedge Designation

Below are a number of points which BTC use to highlight support for a green wedge as outlined by IFCA in AS063 and for its own submission AS068.

d) The above paper in its introduction uses a key phrases;

1.1.2 The countryside plays an important role in the County Borough and therefore requires protection in the interest of safeguarding it for its agricultural function, preserving its rural & scenic landscape, providing opportunities for recreation and tourism, and promoting biodiversity. ^[BTC underlining]

1.1.3 In addition, areas of open countryside provide a 'buffer' between settlements which allows them to function independently from one another, whilst preserving and enhancing their individual character and distinctiveness.

e) Planning Policy Wales

2.1.4 Planning Policy Wales (PPW) also reflects the need for sustainability and the importance of 'respecting local diversity and protecting the character and cultural identity of communities'.

2.1.5 Paragraph 4.7.2 of PPW states that green wedges can:

- Provide opportunities for access to the open countryside;
- Provide opportunities for outdoor sport and outdoor recreation;
- Maintain landscape/wildlife interests
- Retain land for agriculture, forestry, and related purposes, and;
- Improve derelict land ^[BTC underlining]

2.1.6 However, their purpose is to:

- Prevent the coalescence of settlements
- Manage urban form through controlled expansion of urban areas;
- Assist in safeguarding the countryside from encroachment;
- Protect the setting of an urban area;
- Assist in urban regeneration by encouraging the recycling of derelict and other urban land. ^[BTC underlining]

BTC understands the desire to achieve a 'methodical' approach to the assessment and need for a green wedge policy, however, the approach although it must have regard to various criteria such as distances misses locations which are well known to local citizens and Town & Community Councils.

The IFCA AS063 is a classic example which goes back to 2005 pre-approved UDP when the BCBC planners had earmarked the Island Farm area south of the now designated SP9 as a green wedge only for it to be removed at the very last minutes through a political decision.

In paragraph d) above BTC refers to key phrases another is found at; *Section 3 Analysis and results – "Stage 1 Review - Distances between Settlements*

3.1.1 *The first stage of the assessment involved the examination of the distances between neighbouring settlements based on the assumption that the shorter the distance, the more vulnerable the boundaries are to development pressure.* ^[BTC underlining]

3.1.2 *This was undertaken through a GIS mapping exercise, measuring the shortest distance between all neighbouring urban fringes and illustrated on a traffic light theme with the colour of the arrow reflecting the distance between the settlements. Diagram 1 and Table 3 below reflect the findings.* ^[BTC underlining]

BTC maintains that Section 3 does not go far enough and is self-inhibiting and as such ignores direct and implicit threats/pressures which are well known to them (on file) and local people.

In Settlement Boundary Paragraph 4 a) and c) above the threats/pressures are clearly expressed, coupled with the future A48 improvements especially at Broadlands Roundabout allow BTC to believe that the combination of these points are substantial enough to warrant the inclusion of both AS063 and AS068 in the LDP. BTC also believe that their inclusion would not undermine the soundness of the LDP.

BTC strongly opposes the proposal of HD Ltd in relation to AS005 and reallocation to PLA3 and supports the Council current LDP allocation SP9.

BTC strongly opposes HD Ltd request to expand the Settlement Boundary PLA1 up to New Inn Road and supports the Island Farm Campaign for Action and local residents requesting the allocation of a Green Wedge on land between SP9 and New Inn Road.

BTC supports the local residents regarding their concern for their residential and environmental amenity in relation to the alignment of any spine road through SP9 from the A48 to Ewenny Road and BTC especially supports the view that the Council takes the concerns into account in finalising the LDP through appropriate amendments as above.