

Bridgend Local Development Plan

2006-2021



Bridgend Local Development Plan

Examination

<http://www.bridgend.gov.uk/ldpexamination>

Thursday 29 November 2012 10:00am

Session 7 – Retailing

Inspector's Agenda with Matters and Issues

1. EXISTING OUT OF CENTRE RETAIL DEVELOPMENT

[Figures in brackets identify a Representor and their representation number eg 1254.2 refer to Representor 1254 and representation 2].

- 1.1 Paragraph 10.3.1 of Planning Policy Wales sets out criteria for determining planning applications for uses that are best located in a town centre including applications for redevelopment, for extensions, and for variation of conditions. These include considerations of:
- need;
 - a sequential approach to site selection
 - impact on existing centres
- and a number of other factors.
- 1.2 Paragraph 10.3.11 advises the use of planning conditions to control development at edge-of-centre and out-of-centre retail development.
- 1.3 Policy SP10 in summary sets a retail and commercial hierarchy of centres which does not include out-of-centre sites. It goes on to provide that new out-of-centre development should be developed as a result of an identified need and sequential test and should not be of a scale that would harm the vitality, viability and attractiveness of the centres. Policy REG10 seeks that out-of-centre retail development will be concentrated at existing locations, which are listed, and which include Sainsbury's Cefn Hirgoed. The Policy is supported by paragraphs 5.2.23 to 5.2.27. Policy REG11 allocates 4 new sites for out-of-centre retail development.
- 1.4 Sainsbury's Supermarkets Ltd considers that paragraph 5.2.24 does not afford allocated out-of-centre retail sites any future flexibility. This includes their own site at Cefn Hirgoed which they describe as 'an established retail hub'. Sainsbury's therefore seek that paragraph 5.2.24 should be amended as follows: "*Policy REG10 acknowledges the presence of existing retail developments outside of town, district and local centres. ~~It should be stressed that extensions~~ **Extensions** to these sites (including the introduction of mezzanine floors within units **where they comprise development**), increases to the allocated floorspace in new sites or relaxations/changes to the types of goods sold, **will be supported provided it can be demonstrated** ~~require retail assessments of need, sequential test and impact~~ **they would not adversely impact on the vitality and viability of existing centres, as stipulated by national policy**" (1254.2).*

- 1.5 The Council responds that the wording of LDP paragraph 5.2.24 is fit for purpose and reflects the consistent approach which it has taken to date on seeking to manage out-of-centre retail development. The wording as proposed seeks to support out-of-centre retail developments which do not have an impact on the viability and vitality of retail centres and thereby seeks to dilute the Council's position by not requiring demonstration of need and sequential test. In supporting the regeneration-led strategy, the Council will use these tools to consider if a retail development is required and, if it is, then is it best placed in an existing centre to support regeneration activity. This seeks to maximise the positive impact which an in-centre development can have, rather than seeking to permit development which does not have an adverse impact.

Qn1a. Why does the Representor consider that the paragraph is unsound as written?

The Council will await the response from Sainsbury's Supermarkets.

Qn1b. Would the requested deletion of references to need, the sequential test and impact be at variance with national policy and is any such variation justified?

Paragraph 5.2.24 of the LDP refers to the Council's position regarding the extension of existing out-of-centre retail sites. Whilst it does repeat national policy, which is not encouraged elsewhere, it is useful to reiterate the Council's position in these particular scenarios.

Qn1c. Are Policies SP10, REG10 and REG11 clear and consistent as to the role of out-of-centre retailing and how it relates to the retail hierarchy?

Policy SP10 represents the starting point for the consideration of retail applications and seeks to focus them on the retailing and commercial centres of the County Borough. Out-of-centre developments are referenced in SP10 although the Council considers that it may be useful to make a minor change to the plan for clarification purposes to cross-reference policies REG10 and REG11 (and REG5) as having sites which should be considered first in the application of national retail policy.

Additionally, and in relation to this point, the Council has identified the fact that the wording of Policy REG10 states that Tesco, Brewery Lane (Policy REG10(4) refers) and Tesco, Llynfi Lane, Maesteg (Policy REG10(5) refers) are out-of-centre sites, when the UDP (Policies R10(4) and R8(7) respectively) identify them as edge-of-centre, which is a matter of factual description. It would therefore suggest that Policy REG10 could be amended to read:

Policy REG10
Existing Retail Development Outside of Retailing and Commercial Centres

Retail Development outside of retailing and commercial centres will be concentrated at the following existing locations:

Policy	Address	Existing Use	Location
REG10(1)	Bridgend Retail Park	Bulky Comparison and Convenience	Out-Of-Centre
REG10(2)	Waterton Retail Park	Bulky Comparison	Out-Of-Centre
REG10(3)	Sainsbury, Cefn Hirgoed	Convenience	Out-Of-Centre
REG10(4)	Tesco, Brewery Lane	Convenience	Edge-Of-Centre
REG10(5)	Tesco, Llynfi Lane, Maesteg	Convenience	Edge-Of-Centre
REG10(6)	Bridgend Designer Outlet Village	Controlled by s106	Out-Of-Centre

A similar situation presents itself with regards to the Brewery Field site in Policy REG11. It is therefore suggested that the Policy could be amended to read as follows:

Policy REG11

New Bulky Goods Retail Development Outside of Retailing and Commercial Centres

New retail development outside of retailing and commercial centres, not exceeding a combined total of 15,400 sq m of bulky comparison goods development will be directed to the following locations:

Policy	Address	Location
REG11(1)*	Ewenny Road, Maesteg	Out-Of-Centre
REG11(2)*	North East Brackla Regeneration Area	Out-Of-Centre
REG11(3)*	Parc Afon Ewenni	Out-Of-Centre
REG11(4)	Brewery Field, Bridgend	Edge-Of-Centre

Those sites marked with an asterix* are sites included within mixed-use schemes as defined in Policy PLA3.

The Inspector may consider such factual amendments to the description of the policies better reflects national policy and the application of the sequential test.

2. WATERFRONT REGENERATION AREA, PORTHCAWL

- 2.1 Sainsbury's Supermarkets Ltd considers that the omission of a maximum level of convenience and comparison goods floorspace from Policy REG9(6) at Porthcawl Waterfront Regeneration Area does not provide clarity or coherence to the policy and allocation, and requests that such a level is included in the plan (1254.1).
- 2.2 The Council responds that the convenience and related comparison goods proposal allocated by Policy REG9(6) forms part of the wider Porthcawl Waterfront Regeneration Area, as allocated by Policy PLA3(8) of the Plan. This is reflective of the 2007 Porthcawl Waterfront Regeneration Area Development Brief. In addition, the site allocated for the retail development within the framework is contained within the defined boundary of Porthcawl Town Centre as contained within Policy SP10 of the Plan and defined on the Proposals Maps. Paragraph 10.3.2 of Planning Policy Wales states that retail developments within town centres do not have to demonstrate need. Given this, and the fact that paragraph 10.2.12 of Planning Policy Wales advises against the setting of rigid

floorspace limits it is not considered appropriate to include a maximum level of retail provision on this site.

Qn2a. Does the LDP provide that the convenience, comparison and bulky goods retail elements of the mixed use allocation will be limited to the area within the defined town centre which covers only part of the allocation site?

Policy SP10 directs retail development to Porthcawl Town Centre. Policy REG9 allocates land within the Porthcawl Regeneration Area for retail uses. Policy REG9 relates to sites within commercial centres. (The Council consider that this policy could be renamed 'Development Sites in Retailing and Commercial Centres' if this makes the intention of the policy clearer). The adopted Porthcawl Waterfront Supplementary Planning Guidance (SD55) similarly identifies the land within the town centre for retailing purposes. No part of the LDP or associated SPG indicates that it is acceptable for retailing development to take place outside of the defined town centre. Any such application would be determined under Policy SP10 and national policy.

Qn2b. What is the estimated capacity for retail floorspace provision?

The 2010 CACI Retail Needs Study (SD124) concludes that, by 2021, in Porthcawl, taking account of the proposed 2,542 sq m foodstore, there would be a need for -631 sq m of convenience goods floorspace; a small over-supply. In terms of comparison goods, assuming 1,858 sq m of provision within the Waterfront Regeneration area and a 'Do Maximum' scenario for Bridgend, there would be a need for -355 sq m of comparison goods. In terms of bulky comparison goods, there would be a need of 9,808 sq m.

Qn2c. Is there any policy allocation for bulky goods floorspace at Porthcawl?

There is no specific allocation for bulky goods floorspace in Porthcawl. However the Plan, at paragraph 5.2.30 suggests that approximately 1,000 sq m of floorspace could be accommodated within the regeneration area (and hence part of the REG9(6) site (ie within the town centre boundary). The Council have not allocated an out-of-centre site in Porthcawl for bulky goods, because of a combination of limited site availability together with limited occupier demand which could frustrate development. CACI states on page 25 of their report (SD124) that catchment areas for bulky goods retail parks are much wider than town centres. The Council therefore relies on the existing provision in Bridgend (Policy REG10) and the potential for new Bulky Goods development on the policy REG11 sites to meet the demand from the Porthcawl area.

Qn2d. Paragraph 10.2.12 of Planning Policy Wales provides that in allocating sites for retail development local planning authorities 'should not prescribe rigid floorspace limits ... that would unreasonably inhibit the retail industry from responding to changing demand and opportunity'. How do the parties interpret those provisions?

The Council considers that the LDP should set the broad parameters for new retail development and, in a rapidly changing and evolving sector, not seek to unduly constrain future retail development which would otherwise be acceptable under

national planning policy. The figures contained within the LDP represent a starting point for discussion and the Council considers that it has taken a common-sense approach, particularly in relation to bulky goods retailing, and offers a flexible approach in order to bring retail (and other) development forward which will assist in meeting the wider regeneration strategy of the Plan.

3. LAND AT WERN DDU, ABERKENFIG

- 3.1 IGH Properties objects to Policy REG10 on the basis that it 'seeks to concentrate out-of-centre retail development to existing locations'.

Qn5a. Is Policy REG10 in accord with, or in conflict with, national policy on the location of retail development?

PPW is not explicit in stating that existing out-of-centre retail locations should be considered before new sites in the sequential test. However, the Council considers that, as the majority of the existing, mature out-of-centre retail sites are within the urban area, are well served by public transport and have appropriate pedestrian links in place to facilitate sustainable access, that it is sensible to seek consideration of these areas first in terms of their expansion and ability to accommodate further development.

- 3.2 The representor considers that their site at Wern Ddu, Aberkenfig should be included for non-food retail development which would link with existing retail centres nearby (1255.18). There is an assertion that the Valleys Gateway SRGA with 1,194 new dwellings will provide in itself sufficient growth to generate its own retail need. The proposed development would not be 'vulnerable' in flood risk terms. The representor also objects to the green wedge designation between Aberkenfig and Sarn (1255.17) as coalescence between the settlements has already taken place. They consider that their land should be included with the settlement boundary of Aberkenfig (1255.16).
- 3.3 The Council response refers to this as Alternative Site AS041. The Council points out that a large proportion of the site is located within a C2 flood zone. Development could affect a Site of Importance for Nature Conservation. Its green wedge status is based on a recent review and is intended to prevent the coalescence of Aberkenfig and Sarn. Adequate provision is made elsewhere to meet the retail needs assessed in the Retail Needs Report 2010.

Qn5a. How is the need for the development justified having regard to the overall conclusions of the CACI Retail Needs Report and the proposed allocation of retail development elsewhere in the Plan to meet identified needs, particularly as the Representor does not consider that the LDP will deliver the required population growth to generate the expenditure forecasts in the Report?

The Council will await the response from IGH Properties on this issue.

Qn5b How much retail floorspace could the site accommodate?

The Council will await the response from IGH Properties for a definitive answer on this issue. The site itself measures approximately 11ha; assuming that the retail

development would cover 50% of this, it could accommodate approximately 55,000 sq m of retail floorspace.

Qn5c. How much non-food floorspace would be needed to serve the 1,194 dwellings proposed in the Valleys Gateway SRGA?

The Council will await the response from IGH Properties on this issue.

Qn5d. Other than the railway station and the suggestion of a possible courtesy bus between Aberkenfig District Centre and the Outlet Centre (1km east) how accessible is the site by means other than the car?

The Council will await the response from IGH Properties on this issue.

4. BREWERY FIELD, BRIDGEND

- 4.1 LDP paragraph 5.2.29 indicates that the 2010 Retail Needs Study concluded that the quantitative retail need for bulky goods floorspace by 2021 totals 16,400sqm to include 9,808sqm in Porthcawl, 5,428sqm in Maesteg and 1,098sq, in Bridgend. This quantity is reflected in Policy REG11 which allocates sites for New Bulky Goods Out of Centre Retail Development not exceeding a combined total of 15,400 sq m. However of the four sites allocated by Policy REG11, 3 are in Bridgend and 1 is in Maesteg. Paragraph 5.2.30 concludes that the Porthcawl regeneration area has the potential to accommodate the remaining 1,000sqm of the identified need for floorspace although this does not appear to benefit from any policy allocation. LDP Paragraph 5.2.33 comments that the County Borough is already well provided for by bulky goods provision in Bridgend and that areas outside Bridgend may not be attractive to retailers.
- 4.2 Brewery Field Bridgend is adjacent to Bridgend Town Centre. It is currently used as a sports ground but is one of the four sites allocated by REG11 for retail development. It was identified for such development in the adopted Bridgend Town Centre Masterplan and is the only site exclusively allocated for this purpose as the other three REG11 sites are proposed for mixed use. Paragraph 5.2.34 provides that on all four REG11 sites: 'If evidence submitted [when considering planning applications] ... suggest that the inclusion of the required bulky comparison goods floorspace makes a scheme unviable or unrealistic due to a lack of retailer interest, the Council will re-examine its specific requirements for the site.'
- 4.3 Bridgend Town Council would prefer that the Brewery Field site is developed as sheltered housing in the form of extra care units (35.3). This is supported by written representations from Merthyr Mawr Community Council (46.8).
- 4.4 The Council response in SD09 refers to this as Alternative Site AS005. They say that the masterplan identifies the site as being retained in its existing use in the short term with longer term potential for bulky goods to complement the town centre core. There is considered to be a lack of evidence that the Town Council's alternative proposals are realistic and deliverable within the plan period.

Qn6a. Is the REG11 floorspace figure for gross or net retail space?

The figure quoted in REG11 is a net figure.

Qn6b. How much bulky goods floorspace could this site potentially accommodate?

The site is similar in size to the Bridgend Retail Park which contains c.7,600 sq m net of bulky goods retail floorspace compared to an overall requirement for bulky goods of 15,400 sq m.

Qn6c. Is the floorspace to be distributed on a 'first come, first served basis? Or how would floorspace otherwise be allocated between the sites?

Qn6d. Is the allocation dependent on the replacement of the sports facility elsewhere?

The floorspace of each individual development will be negotiated on a site by site basis. The Council did consider the specification of individual amounts of floorspace to each site. However; due to the uncertain nature of the bulky goods retail market, it decided to adopt a flexible approach to these developments and, as 3 out of the 4 sites in Policy REG11 are on mixed use PLA3 sites, that consideration of these issues would take place during detailed negotiations on the sites in order to bring these forward as a key element of the regeneration-led strategy.

In terms of the Brewery Field, development of this site is subject to the replacement of the facility elsewhere, the favoured and most obvious location being on the proposed Island Farm development. As this site is edge-of-centre, and offers good access by public transport and car, the Council consider that its allocation for Bulky Comparison Goods will, in the longer term, safeguard the site against other uses which could more appropriately be located elsewhere.

Qn6e. Has the Town Council's proposed alternative residential development been subject to sustainability appraisal?

Yes it has.

Qn6f. What is the landowner's position?

The Council has the freehold ownership of this site with a lease to Brewery Field Ltd. The landowners position on this site is outlined on pages 28 – 30 of the Bridgend Town Centre Masterplan (SD50) which has been adopted as Supplementary Planning Guidance.

5. SOUTH WALES POLICE HEADQUARTERS, BRIDGEND

- 5.1 Waterstone Estates Ltd considers that the CACI retail needs report is flawed and that there is additional retail need in the Bridgend area. Reasons are given to support their view that convenience goods capacity has been underestimated by up to 7,417 sqm at 2021. They therefore consider that the South Wales Police Headquarters site should be allocated for retail development (1258.1). The

representor also considers that Paragraph 5.2.21 should be revised to reflect the correct capacity position and a need confirmed in Policy REG5 for a further foodstore of a size comparable to existing stores (approximately 4,000 sq m net convenience goods floorspace and 9,000sq m gross). This will also leave capacity to support improvement to other convenience provision in Bridgend across the plan period (1258.3). The Representor does not consider that there is any sequentially preferable site with what they say is the minimum requirement of 3.5ha of land.

- 5.2 Waterstone Estates Ltd therefore considers that the South Wales Police Headquarters site should also be removed from COM1 where it is proposed for the development of 130 dwellings (1258.2). Consequential amendments are sought to the Proposals Map 27 (1258.4).
- 5.3 The Council refers to its response to Alternative Site AS053. The Council is confident that both the original 2007 and 2010 update retail needs reports undertaken by CACI Ltd (which form the evidence on which retail allocations are based) follow a well-established and robust procedure for assessing future retail need. Policy REG5 does allocate land for new local-convenience food shopping opportunities on a variety of its mixed-use regeneration sites. Policy REG9 allocates sites within and adjacent to town and district centres for retail and commercial developments. These will help to meet the day-to-day needs of residents of the area, enabling them to undertake a proportion of their shopping needs in a sustainable way. The Council maintains its position that, taking into account those sites allocated in Policy REG5 and REG10, and the application of the national retail planning policy tests, that there is no requirement to allocate this site for future retail development.

Qn6a. What is the Council's response to the Representor's specific criticisms of the Retail Report in relation to the need convenience provision in Bridgend?

Qn6b. Does the proposal accord with the sequential test?

Qn6c. Would the proposal have an adverse effect on the vitality and viability of any centre in the listed retail hierarchy?

Qn6d. Could what the Representor says is the identified need be met by several smaller store convenience stores in sequentially preferable locations?

[The Council will issue a separate statement on these questions which now relate to session 8.](#)

6. LAND AT HEOL MOSTYN, PYLE

- 6.1 In relation to Policy SP10, K & W Developments (Wales) Ltd considers that their site at Heol Mostyn, Pyle, should be included within the adjacent District Centre of Pyle. They consider that the centre's boundary is drawn too tightly around existing built development and takes no account of the contribution that the subject site can make to supporting and promoting the vitality and viability of that centre. In particular the site may contribute to accommodating new retail investment and providing the potential for improved highway access (827.1).

- 6.2 K & W Developments (Wales) Ltd also object to the inclusion of their site within Village Farm Industrial Estate employment allocation - REG1(37). There is no market for speculative employment development in Pyle. Where demand does exist for employment space, there is a ready supply of Grade A and B accommodation within Pyle and other estates in the locality to meet current and foreseeable need that do not carry the cost that developing this site would carry (827.2)
- 6.3 The Council refers to its response to Alternative Site 054 in SD09 and to Background Paper 7: Retail Review. The Council considers that the site needs to be protected for employment use to serve not only Pyle/Kenfig/Cornelly but also Porthcawl where there is a large shortfall in available employment land.

Qn3a. How could the site contribute to improved highway access?

The Council will await the response from K & W Developments on this issue.

Qn3b. What was the site last used for and how long has it been vacant?

The Council will await the response from K & W Developments on this issue.

Qn3c. Has the site been marketed for employment use?

The Council will await the response from K & W Developments on this issue.

The Council's economic development unit are not aware of any active marketing which has taken place on this site.

Qn3d. Is the site deliverable as an employment site having regard to the Representor's comments about the lack of a market for speculative employment development and the availability of other accommodation?

The Council's records indicate that there has been a steady take up of employment land on Village Farm Industrial Estate. In 1997, 9.06ha of land was vacant. This had fallen to 5.15ha in 2009.

The lack of a market for speculative employment development and the availability of other accommodation are short-term issues. The LDP needs to plan for the long term and, given the relatively small supply of readily-available land for employment purposes in this part of the County Borough (particularly given the shortage in Porthcawl) the remaining land on the Village Farm Industrial Estate is crucial in offering a range and choice of sites for potential investment in the future.

Furthermore, the site represents a logical one for employment, forming part of the estate itself and having a main frontage access on the estate road.

Qn3e. Would retail employment meet the LDP employment objectives?

Whilst retail development on the site would provide local employment opportunities, the Council would not like to set a precedent for this argument in regard to this site. Paragraph 10.3.3 of PPW states that additional employment benefits are not considered qualitative need factors in retail policy terms.

The site itself stands apart from the other elements of Pyle District Centre and so the Council does not consider that its development for retailing purposes would complement the area, extending the existing commercial centre boundary to such an extent as to harm the vitality and viability of the existing centre.

7. PYLE GARDEN CENTRE, PYLE

- 7.1 C Patten considers that Pyle Garden Centre should be included within Pyle District Centre. The representor states that the site has been in A1 retail use for over 35 years and is an important element in the vitality, viability and attractiveness of the Pyle District shopping area (1259.1).
- 7.2 The Council refers to its response to Alternative Site 038 in SD09 which in turn refers to Background Paper 7: Retail Review (SD41). The latter paper acknowledges that the north western corner of the Industrial Estate (which would include part of the subject site) has become dominated by retailing units providing services which can be used in connection with the industrial estate (i.e. bakeries) and services for the residents of Pyle and the wider community. The recommendation which follows proposes: 'Extensions to Pyle retailing centre in the LDP'. However the defined boundary defined elsewhere in the document then excludes all of the Industrial Estate. The garden centre is instead included in the REG1(37) employment site allocation where REG2 resists the loss of industrial land or buildings.

Qn4a. Why was the District Centre not extended as apparently recommended in the Background Paper?

The Pyle District Centre boundary has been extended from the UDP position and now extends to an area in the north western part of Village Farm industrial estate which was previously allocated for employment use. This was to reflect the growing-retail nature of this enclave of the estate, immediately adjacent to the UDP commercial centre boundary. See attached plan at Appendix A.

Qn4b. Does the entire Garden Centre included in the representation currently benefit from unrestricted retail A1 use?

Having examined the Planning History of the site, the Council considers that the initial garden centre permission in the 1970's was for a 'Garden and Leisure Pursuits Centre'. In 1985 (applications 85/138 and 85/372 refer) this was extended to include DIY / bulk building materials and for the sale of caravans, gardening materials and boats. Notwithstanding this, the Council's position to date on this issue is that any demolition of the existing structures would extinguish existing use rights and would therefore have no bearing on future planning applications.

Qn4c. Is any of the subject site in industrial use?

None of the site is currently in industrial use. However, the eastern part of the site does contain land identified as being vacant on the Council's employment land survey which could be accessed separately off the industrial estate road to the east (See Appendix A). It is the intention of the Council that any redevelopment of this area of land could bring forward employment development on part of this site.

Qn4d. What employment does the Garden Centre currently provide?

The Council will await the response from K & W Developments on this issue.

Qn4e. What development could inclusion in the District Centre permit that would otherwise be prevented?

The Council has received previous approaches from land owners of the site to redevelop the Garden Centre for convenience goods retailing as the existing use of the site for a Garden Centre was considered unviable in the long term. However, the lease / management of the site has recently changed and the Garden Centre has now had a high profile re-launch under a new name.

Previously, when considering alternative uses for the site, if it discontinued in its current form, the Council has accepted that there *may* be a qualitative (rather than quantitative) need for small scale (ie approximately 1,000 sq m net) additional convenience goods floorspace in this part of the County Borough and has encouraged previous enquirers (relating to this site) to undertake retail assessments to determine this. This information has not been forthcoming; and in the absence of such information the Council has not included it within the District Centre.

It is the Council's contention that a scheme of this nature could assist in enabling the development of the vacant employment to the east of the site previously referred to, thus contributing to the wider aims of the plan. However, this would need to be undertaken in a comprehensive manner (with Development Briefs and/or legal agreements attached) which previous enquirers have been reluctant to embrace.

Qn4f. Does Policy REG2 have any relevance to the existing garden centre if it is not an industrial land use?

Policy REG2 would not directly affect the garden centre element of the site as it is not in an existing employment (B1, B2 and B8) use. However, it would apply to the vacant employment land element at the rear of the site. The whole area continues to remain in an allocated employment site which is protected for industrial and business development by Policy REG1, which, in the absence of any meaningful scheme coming forward as part of a development brief (see above) and the fact that the future of the garden centre is now more secure, represents the most appropriate option.

8. SARN PARK SERVICES

- 8.1 Sarn Park Services adjoin M4 Junction 36 and are within the Valleys Gateway Strategic Regeneration Growth Area. Background Paper 10 describes this as an ideal location for an office business park.
- 8.2 Policy REG1(22) allocates 3.80ha land adjacent to Sarn Park Services for industrial and business development within use classes B1 (which class includes offices) and B8 (storage and distribution). Welcome Break considers that the uses permitted on the site should be widened to allow for greater flexibility and therefore enable the delivery of the employment allocation. The uses proposed include a range and choice of A3 uses, a crèche, a health club/gym, retail and a hotel and conference facilities. The representor seeks that paragraph 2.3.80 is expanded to include the following text: *'An opportunity also exists to deliver additional retail and commercial development on the site to compliment the necessary Motorway Service Area (MSA) facility and the proposed business park (REG9(x)). This may include facilities such as a hotel, conferencing facilities, A3 uses, leisure facility and retail use, in addition to the integration of the existing pedestrian connection across the M4 motorway to connect to adjacent facilities. These uses will be accessible to the communities of the Valley's Gateway and the Ogmore, Garw and Llynfi Valleys'* (797.1).
- 8.3 Welcome Break considers that Sarn Park Services MSA itself should be included within the adjacent employment allocation REG1(22) and include an element of retail under Policy REG9 Retail and Commercial Development Sites (797.2).
- 8.4 In document SD09 the Council response refers to this as Alternative Site AS024. The Council considers that the LDP policies are already sufficiently flexible to accommodate some other uses that are deemed acceptable on employment sites (eg A3 food and drink, health club/gym, crèche and possibly a hotel) and no policy change is appropriate. The prime development site is not suitable for bulky goods retail which is provided for elsewhere by the Plan and any retailing should not adversely impact on the vitality and viability of the wider retail services in the County Borough. The Council accepts the need for improved facilities on the site but considers that this should be negotiated in the context of an operational brownfield site in the countryside and subject to a masterplan development brief to include the adjacent employment site.

Qn9a. What form of retailing does the representor seek given that Policy REG9 applies to the regeneration of sites in existing town and district centres and out of centre bulky goods are included in REG11?

[The Council will await the response from Welcome Break on this issue.](#)

Qn9b. What is the Representor's response to the Council's suggestion?

[The Council will await the response from Welcome Break on this issue.](#)

Qn9c. If this is a prime development site and ideal for office development and ancillary development, why does the allocation include B8 storage and distribution?

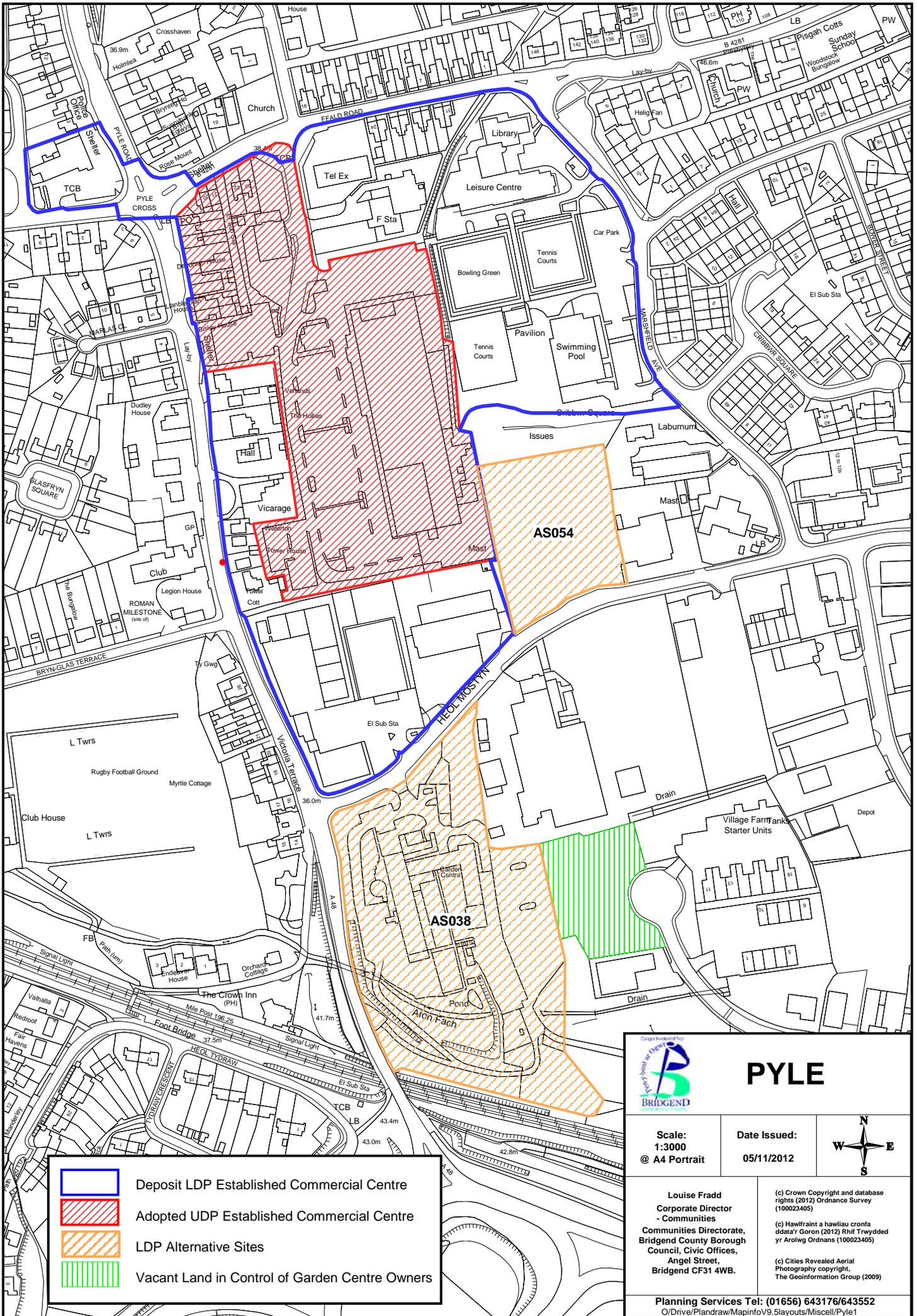
[In adopting a flexible approach to this site, the Council, in acknowledging its position immediately adjacent to the M4 motorway, also consider that it could also](#)

be attractive for B8 distribution facilities. These could be complimentary to the existing use of part of the site which is used as a HGV stop facility.

Qn9d. How accessible is the site by means other than the car?

The site is, by its very nature and location, as a motorway service centre is currently accessible by the private car. However, it also lies approximately ½ mile (850m) from Sarn railway station and a half hourly bus service currently passes the site. Additionally, the site is served by a pedestrian footbridge which provides links to the Designer Outlet Centre site to the south of the motorway which, itself, is served by public transport, including many bus services which serve the valley communities to the north and long-distance, inter city coach services which run along the M4. It is also located in very close proximity to the Valleys Gateway community of Sarn.

Appendix A



	Deposit LDP Established Commercial Centre
	Adopted UDP Established Commercial Centre
	LDP Alternative Sites
	Vacant Land in Control of Garden Centre Owners



PYLE

Scale:
1:3000
@ A4 Portrait

Date Issued:
05/11/2012



Louise Fradd
Corporate Director
- Communities
Communities Directorate,
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Angel Street,
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