

Mrs Nicola Gulley,  
Inspector,  
Planning and Environment Decisions Wales,  
Crown Buildings,  
Cathays Park,  
Cardiff,  
CF10 3NQ

10<sup>th</sup> March 2023

Dear Mrs Gulley,

## Replacement Bridgend Local Development Plan 2018 – 2033 Inspector's Note - Productive and Enterprising Places – Employment and Infrastructure

I refer to your note dated 8<sup>th</sup> March and offer the following responses to the areas requiring further clarification and/or information.

### 1. Policy ENT 1 - should reference to 'the Council' be deleted?

BCBC agree that the reference to "the Council" should be deleted from Policy ENT1 and propose the following amendment:

#### ENT1: Employment Allocations

To support the ~~Council's~~ Employment Land Strategy, 71.7 hectares of available employment land is allocated for employment development at the following locations for the uses specified:

Employment Site	Available Land (ha)	Uses
<b>Strategic Employment Sites</b>		
1) Brocastle, Waterton, Bridgend	20.4	B1, B2, B8
2) Pencoed Technology Park	5.4	B1, B2, B8
<b>Employment Sites: Bridgend Sustainable Growth Area</b>		
3) Brackla Industrial Estate	7.7	B1, B2, B8
4) Bridgend Industrial Estate	9.2	B1, B2, B8
5) Coychurch Yard, Bridgend	0.1	B1, B2, B8

6) Crosby Yard, Bridgend	0.8	B1, B2, B8
7) Parc Afon Ewenni	2.0	B1, B2, B8
8) Waterton Industrial Estate	10.0	B1, B2, B8
<b>Employment Sites: Pyle, Kenfig Hill and N Cornelly Sustainable Growth Area</b>		
9) Land at Gibbons Way, North Cornelly	0.0	B1
10) Village Farm Industrial Estate, Pyle	2.6	B1, B2, B8
11) Ty Draw Farm, Pyle	2.23	B1, B2, B8
<b>Employment Sites: Maesteg and the Llynfi Valley Regeneration Growth Area</b>		
12) Ewenny Road, Maesteg	3.5	B1, B2, B8
<b>Employment Sites: Pencoed Sustainable Growth Area</b>		
13) The Triangle Site, Bocam Park, Pencoed	1.0	B1
<b>Employment Sites: Other Locations</b>		
14) Brynmenyn Industrial Estate	2.0	B1, B2, B8
15) Land adjacent to Sarn Park Services	2.7	B1
16) Land west of Maesteg Road, Tondu	0.3	B1
17) Isfryn Industrial Estate, Blackmill	0.4	B1, B2, B8
18) Abergarw Industrial Estate, Brynmenyn	1.4	B1, B2, B8
<b>Total</b>	<b>71.7 hectares</b>	

## 2. Policy Ent 2 - is the Council proposing to delete the former Christie Tyler site from the policy, and if so, why?

Yes, BCBC propose to delete the former Christie Tyle site from Policy ENT2.

The reason for this is that the Council believes that its inclusion in the Deposit LDP was a drafting error. Policies ENT1 and ENT2 were informed by the findings of the Economic Evidence Base Study 2019 (SD69). Paragraphs 6.24 – 6.28 and Appendix B Site Assessments of the EEBS specify the reasons for not taking this site forward into the RLDP as follows:

“6.2.6 Two ha of land at Christie Tyler was intended to be delivered as a PLA site – partly alongside housing, but the small quantum of employment land expected would not appear to be integrated into the main estate to the south. We think it more reasonable that any ‘need’ is met by expanding the existing estates rather than by promoting a new, small and separated estate which is what this development would deliver. This suggests that this land is not needed for employment in the next plan...”

The following is extracted from Appendix B of the EEBS:

“Despite this site sharing similar locational factors to Brynmenyn Industrial Estate and Abergarw Industrial Estate the development of residential on part of the site has ebbed its suitability for

---

employment use. Furthermore, the availability of land on the neighbouring estates means that it is not critical to retain this land for future employment needs. The greater integration opportunities for land south of Brynmenyn Industrial Estate compared with this site suggest that Brynmenyn IE should be the site to take forward in what is a limited market for additional employment land in this area.”

### **3. Policy ENT 3 – should the policy be amended to read ‘will be supported where’ rather than ‘will also be permitted unless’?**

BCBC agree that Policy ENT4 should be amended as follows:

#### **ENT3: Non-B Uses on Allocated Employment Sites**

The change of use of allocated industrial and commercial land and premises (including vacant land on employment sites) from Use Classes B1, B2 and B8 to residential uses will not be permitted. The change of use from Classes B1, B2 and B8 to other uses will **be supported where** ~~also not be permitted unless~~ it can be demonstrated that:

- 1) There are no other suitable sites available with reference to the retail hierarchy detailed within SP12 and other policies in this Plan;
- 2) A building on an allocated employment site is required to accommodate the use;
- 3) The property or site has been vacant for a period of at least 12 months and has been marketed throughout that time at a fair market value for the area and the condition of the property or site;
- 4) The proposed new development will have no unacceptable impact on neighbouring existing occupiers or allocated uses; and
- 5) The site is accessible by a choice of means of transport other than the car and promotes use of Active Travel opportunities.

### **4. Policy ENT 4 - should the policy be amended to read ‘supported’ rather than ‘positive weight’?**

BCBC agree that Policy ENT4 should be amended as follows:

#### **ENT4: Rural Economy**

---

In locations outside of the settlement boundary, ~~positive weight will be afforded to~~ new applications for 'expansion' or re-location of firms who have operated within the settlement for at least 3 years **will be supported**, and where:

- 1) It is demonstrated that there are no suitable buildings or sites within the settlement or nearby;
- 2) The site is previously developed land or it can be demonstrated that there are no suitable previously developed sites available;
- 3) The proposal is justified by a business case, demonstrating that the business is viable;
- 4) There is a named user for the development, who shall be the first occupant secured by a planning condition; and
- 5) The proposal is well related to the built form of the settlement and of an appropriate scale to the settlement.

## **5. Policy ENT 5 – should the policy be revised to omit the reference to ‘the Council’ and to provide criteria which would support / guide the future redevelopment of the site?**

BCBC agree that the reference to ‘the Council’ should be omitted from Policy ENT5 as follows:

### **ENT5: Former Ford Site, Bridgend**

The ~~Council will prioritise the~~ re-development of the former Ford Site **will be prioritised** as a key economic opportunity ~~and will work collaboratively~~ **in collaboration** with Welsh Government and the landowners to secure the best outcome for Bridgend, whilst seeking to replace the jobs that have been lost. The former Ford Site constitutes a pivotal economic land allocation within the successful Waterton Industrial Estate and will be promoted as a means of economic stimulus for Bridgend County Borough and the wider regions.

With regards to the need for criteria to support the redevelopment of the site, BCBC believes that the supporting text at para 5.4.38 clearly states that the criteria within policies ENT2 and ENT3 represent a starting point in the consideration of future development proposals. However, due to the size and complexity of the site, it is felt that additional flexibility is required to maximise the sites potential to make a much larger economic impact than the previous use.

This approach and the wording of Policy ENT5 follows the recommendations of the Economic Evidence Base Update 2021 (SD70) at para 6.1.4:

---

“the plan should move to consider the site as a new development opportunity – effectively considering the land as new supply. The jobs previously on site have been lost and the building no longer has an economic purpose (setting aside ‘meanwhile’ reuse where possible). As a development opportunity the site has scope to make a much larger economic impact (in terms of jobs supported) than the old use. Further work is needed to confirm how much new space, of what type and mix but the sites location and previous economic history would support the Council looking to maximise the economic opportunity of the site as a matter of priority.”

BCBC believes that the most appropriate means of responding to the economic evidence base and providing future development guidance for the site should take the form of Supplementary Planning Guidance which will incorporate masterplanning undertaken in collaboration with key stakeholders. This process will test and refine the type and mix of uses which will help to bring flexibility and choice to the employment land supply, whilst acknowledging that an element of cross-subsidisation may be required on part of the site to help bring it forward given the extent of enabling works required.

#### **6. Policy COM 9 - should the policy be amended to read ‘Where it can be demonstrated’ rather than ‘In the view of the LPA’?**

BCBC agree that Policy COM9 should be amended to read as follows:

##### **COM9: Protection of Social and Community Facilities**

Proposals which would adversely affect or result in the loss of existing or proposed social and community facilities will not be permitted unless justified on one of the following grounds:

- 1) A sustainable, easily accessible alternative location is available and a facility of equivalent community benefit is provided by the developer on the site or off site within the community; or
- 2) ~~In the view of the LPA~~ **Where it can be demonstrated that** the existing facility is no longer required for the current use, or any other social and community uses, or there is already an excess of such provision in the area.

#### **7. Policy COM14 - should the reasoned justification of the policy be amended to include reference to Future Wales and the importance of digital communication infrastructure? and**

BCBC agree that the reasoned justification of Policy COM14 should be amended and propose the following amendment at paragraph 5.3.75:

---

“5.3.75 Adequate and efficient telecommunications and digital technology infrastructure is increasingly crucial for economic, social and environmental sustainability. **Future Wales outlines how digital communications infrastructure is vital to the future success and economic competitiveness of businesses, whilst supporting community and individual needs. Hence, Future Wales supports the provision of digital communications infrastructure and services across Wales and requires new developments to include the provision of high-speed broadband infrastructure from the outset.** PPW outlines that affordable, secure electronic communications underpin economic competitiveness and can provide opportunities for households and businesses to achieve socially and environmentally desirable ways of living and working. COM14 supports telecommunications infrastructure where it is required, whilst safeguarding against any adverse impacts on residential amenity, natural and built heritage assets, sensitive landscapes and other environmental designations. Developers should proactively engage with owners or operators of sensitive uses (such as hospitals, childcare facilities or educational establishments) early on in the development process to discuss any technical or other amenity issues that may arise as a result of the development. COM14 seeks to enable the County Borough to respond positively and flexibly to technological advances over the Replacement LDP period, whilst minimising impacts on amenity and the local environment.”

## **8. Policy SP 10 – should criteria 9 of the policy include reference to ‘health facilities?’**

BCBC agree that Policy SP10 should include reference to ‘health facilities’ and propose the following amendment:

### **SP10: Infrastructure**

All development proposals must be supported by sufficient existing or new infrastructure. In order to mitigate likely adverse impacts and/or to integrate a development proposal with its surroundings, reasonable infrastructure provision or financial contributions to such infrastructure must be provided by developers where necessary. This will be secured by means of planning agreements/obligations where appropriate.

The requirements for such agreements will include consideration of and appropriate provision for:

- 1) Affordable housing;
- 2) Economic Infrastructure – Telecommunications / broadband infrastructure;
- 3) Utilities;
- 4) Educational facilities and/or their upgrades;
- 5) Green infrastructure and outdoor recreation;
- 6) Renewable energy and low carbon technologies;
- 7) Transportation Infrastructure - Improvements to the highway network, including walking and cycling routes (Active Travel) and public transport;

- 8) Protection, enhancement and management of the natural, historic and built environment;
- 9) Community facilities, **health facilities** and/or their upgrades;
- 10)Waste management and recycling facilities;
- 11)Initiatives to manage and mitigate the impact of climate change; and Improvements to the public realm;
- 12)Welsh Language.

Infrastructure providers will be consulted on relevant planning applications.

LDP Objectives	SOBJ: 1, 2, 3, 4 All objectives
Future Wales	Shaping Urban Growth and Regeneration – Strategic Placemaking Renewable Renewable and Low Carbon Energy and Associated Infrastructure Strategic Policies for Regional Planning
PPW	Strategic and Spatial Choices: Supporting Infrastructure Transport Housing Economic Infrastructure Productive and Enterprising Places Energy Distinctive and Natural Places, Green Infrastructure
WBFG Act	A Healthier Wales A Wales of cohesive communities A more equal Wales A Wales of vibrant culture and thriving Welsh Language
LWBP	Best start in life Support communities in Bridgend County to be safe and cohesive Reduce social and economic inequalities Healthy choices in a healthy environment
Key Evidence	PPW TAN 2 Planning and Affordable Housing

---

TAN 4 Retail and Commercial Development  
TAN 5 Nature Conservation and Planning  
TAN 16 Sport Recreation and Open Space  
TAN 18 Transport  
TAN 20 Planning and Welsh Language  
Infrastructure Delivery Plan  
Candidate Site Assessment  
Local Housing Market Assessment  
Green Infrastructure Assessment  
Outdoor Sport and Childrens' Playspace  
Audit  
Renewable Energy Assessment

Yours Sincerely



Richard Matthams,  
Strategic Planning and Transportation Manager