

## **BRIDGEND COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN EXAMINATION**

### **Hearing Session 11 (Matter 11): Good Design and Sustainable Placemaking – Strategic Allocation at Land East of Pencoed (PLA4) and SP2 (4)**

**Tuesday 28<sup>th</sup> March 10:00 – 17:00**

Submissions made on behalf of  
**Bridgend College (219) by Savills**

The following statement has been prepared for Session / Matter 11 of the LDP Examination. The Inspector's questions are repeated before a brief answer (to those which are relevant) is provided. The following responses relate to Land East of Pencoed which is considered in policies PLA4 and SP2 (4).

*Issue: Is the allocated Strategic Development Site soundly based and capable of delivering new residential and community development over the Plan period?*

#### **a) What is the current use of the Strategic Development Site (SDS)?**

The site is currently in use as readily available, vacant greenfield land and is located to the north-east of Bridgend, to the north of the M4 motorway. It is grazed and has previously been used as part of the College's equine and agricultural curriculum (for the grazing of livestock). The college has recently purchased approximately 39 acres of additional land (together with a range of modern stock and machinery) at Lynwood Farm, Brynna to which it intends to move any displaced elements of the curriculum to.

The site comprises approximately 44.27ha and is arranged in two parts: the main site (land to the east of the A473) and the additional land (measuring approximately 6ha) to the west of the A473. The site benefits from being fully owned by Bridgend College meaning there are no constraints from an ownership perspective.

#### **b) What is the proposed use of the SDS?**

Policy PLA4 proposes that Land East of Pencoed is allocated for the following elements:

- 804 residential units;
- 20% affordable units;
- 2.3ha 1.5 Primary School;
- Outdoor Recreation Facilities; and
- Active Travel Routes.

#### **c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?**

The site is free from constraints that could preclude development. Notwithstanding this, in the interest of clarity, known constraints have been identified, duly highlighted to BCBC during the RLDP process and are addressed below in turn. The indicative masterplan for the site demonstrates how the constraints affecting the site are responded to and can inherently be mitigated against as part of the masterplanning process. The key constraints requiring consideration are summarised below, with further information found in the technical, environmental and masterplanning documents prepared to support the proposed allocation.

##### *Gas Pipeline*

A high pressure gas pipe runs from the north east of the site to the southern boundary of the site. The masterplan informing the proposed development (as submitted to BCBC to inform the preparation of the RLDP and available in the Examination Library under document reference 'SD164 Masterplan and

Proving Layout Report') considers the consultation zones and easements required in relation to the route of the pipeline.

#### *Flood Risk*

The current NRW flood map for planning and associated TAN15 (adopted in 2004) shows that the site lies mostly in Flood Zone A, so it is considered to be at little or no risk of fluvial or coastal / tidal flooding. At present, the maps show that the land on the south eastern corner of the site is designated as Flood Zone C2 (land which is without significant flood defence infrastructure).

However, working alongside JBA, the applicant has undertaken due diligence and extensive work with regards to the flood risk position on site and the revised flood maps. As part of the RLDP process, a flood map challenge has been issued by JBA – this exercise has proved successful and has been accepted by NRW.

A revised TAN15 is due to be implemented in June 2023. This will be supported by the new flood map for planning, which includes climate change information to show how this will affect flood risk extents over the next century.

The emerging flood map for planning demonstrates that the majority of the site is not at risk of flooding. There is a small portion of the eastern boundary of the site which is in Flood Zones 2 and 3. However, through the masterplanning exercise, development has been directed away from these areas. In addition to this, the appropriate documentation (flood consequences assessment and drainage strategy) to address the Flood Zones 2 and 3 designations will be provided at outline planning application stage.

#### *Ecology and Landscape*

The site is not subjected to any ecological or landscape designations. An Ecological Assessment, undertaken by Soltys Brewster, supported the promotion efforts at the site and confirmed that the site is not covered by, or located close to, any nature conservation designations. Similarly, at the time of the survey, there were no records of or protected or notable fauna or flora recorded on the site. The assessment confirmed that a range of habitats were present at the site yet these consisted primarily of intensively managed semi-improved and amenity grassland with a network of native hedgerows with small areas of plantation, woodland, ruderal vegetation, bracken and scrub. Finally, the assessment also notes that the majority of the site (which comprises of amenity grassland and closely grazed, poor semi-improved grassland) is considered to be of low ecological value.

The survey work will be updated this Spring and submitted with the outline planning application, but on the basis of previous survey work, it is evident that the proposals are unlikely to have any detrimental impact on the site's biodiversity or the biodiversity of the wider context. Where possible, habitat features such as the wooded stream corridor, networks of hedgerows and plantation woodland will be retained and enhanced – and inherent mitigation against the potential effect of development on these features will be provided. Therefore, the Proposed Development is unlikely to trigger any significant adverse impacts on biodiversity.

#### *Heritage*

Although there are two listed buildings within the college campus (Tregroes House and the bridge located on the driveway leading to the house), it must be noted that no part of the allocated site is located within a Conservation Area and these listed assets are outside of the site boundary.

#### *Tree Preservation Orders (TPOs)*

There are no trees subject to TPOs directly located on the application site. For reference, there are five trees within the main site (directly south of Tregroes House) subject to Tree Preservation Orders (TPOs). There are also a number of longstanding TPOs (individual trees, group and hedgerows) on land to the west of the A473 however these trees are not affected by the proposed development.

### *Agricultural Land Classification*

As part of the site's promotion in the RLDP, an Agricultural Land Classification and Soil Resources Report (March 2020) prepared by Reading Agricultural Consultants and a subsequent note, prepared by Savills (September 2020) were submitted to BCBC.

The Reading Agricultural Consultant report concludes that 49% of the total site (which includes the existing BCBC campus and land to the west of the A473) as per the candidate site assessment work undertaken as part of the LDP process is grade 3a so represents Best and Most Versatile (BMV) Agricultural Land.

Notwithstanding this, the technical information submitted noted that there are no substantial elements of BMV within the site and concluded that the loss of BMV land is justified on the grounds of delivery of much-needed new homes and no alternative available and suitable land in lower agricultural grades as an alternative to accommodate the required level of strategic growth in a sustainable manner. This is concluded by BCBC in its LDP Background Paper 15: The Best and Most Versatile Agricultural Land.

In light of the above, it must be noted that extensive technical information has been prepared and submitted to the Local Planning Authority. This demonstrates that these identified constraints do not pose any risk to the development of the site and can be suitably addressed and mitigated in its delivery during the plan period.

#### **d) In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?**

The viability of all sites has been tested extensively, in the Plan-Wide Viability Assessment (SD81), the Potential Strategic Sites Independent Financial Viability Appraisals Report (SD82), and the Updated Financial Viability Appraisals Addendum – Strategic Sites (SD83). This information considers the viability assessments undertaken by Savills in April 2020 and May 2022.

The viability of the site was most recently appraised in the Updated Financial Viability Appraisals Addendum – Strategic Sites (SD83) prepared by Burrow-Hutchinson Ltd (BHL). BHL is an independent development consultancy with extensive experience assessing the viability of sites across the South Wales authorities. Paragraph 3.5 of that Report confirms the viability of Land East of Pencoed stating that:

*'BHL confirms that at current costs and values there should be no fundamental concerns about the viability of any of the SHA's covered by this Report. The IFVA's undertaken have been based on realistic and reasonable assumptions concerning costs and values, and demonstrate that all the SHA's are capable of meeting the proposed RLDP policy requirements in full, whilst also providing competitive returns to both the landowner (s) and the developer (s) involved'.*

The above statement – and the extensive suite of technical information which informs it – demonstrates and confirms that the site is economically viable.

#### **e) Are the number of residential units proposed realistic and deliverable over the plan period?**

The masterplan Report (prepared by Austin Smith Lord, June 2022, Rev 02) shows the site as having capacity for 804 homes. The density proposed (in the region of 40.6 dph) is considered wholly appropriate. This is evident when considering that areas of higher density are arranged along the west of the site, closer to the existing town centre and local facilities whereas to the east, the site densities begin to reduce as the site becomes more rural in character. This approach is in line with best practice and demonstrates that the design rationale – and units proposed within it – are sound and reasonable.

Furthermore, as highlighted in the statement of common ground and in the planning programme, the site promoter confirms that the number of units specified in the allocation (804) can be comfortably delivered in the plan period up to 2033. The site promoter is in pre-application discussions with the Council in relation to an outline planning application and intends to submit this application in Summer 2023. The site promoter (also site owner) will subsequently bring the site to the market.

**f) How and when will the proposed new educational facilities be delivered?**

The primary school facilities proposed as part of the allocation will be delivered via developer contributions towards education facilities generated by the proposed development. The proposed site for the primary school includes Council-owned land.

**g) What are the mechanisms and timescales for delivering the site?**

Bridgend College has worked alongside BCBC with regards to the formulation of its Housing Trajectory. Table 3 (Housing Trajectory Phasing, RLDP Strategic Sites) on page 5 of the Statement of Common Ground shows that the delivery of new homes at the site can commence mid 2026-2027 with 84 units delivered in the first year following by 120 (annually) thereafter until 2032/2033. It is anticipated therefore that the site can therefore be delivered in full during the plan period.

This assumes an application for outline planning permission being submitted in Q3 2023, a decision issued in mid-2024 (during which the site will be being marketed to secure a developer although the site promoter wishes to confirm that the site has already been subject to market interest), and an approximately two year period after this to allow for the selection of a housebuilder to deliver the scheme and works on site before the first home is delivered. The delivery rates set out in the SD241 "Statement of Common Ground, Strategic Sites" are considered reasonable (for a site such as this in this location) given there will likely be two outlets and largely mirror those of the other Strategic Sites.

The site promoter has been engaging with BCBC in pre-application discussions and anticipates engaging BCBC in further pre-application discussions in advance of the Hearing Session commencing. This demonstrates the site promoter is looking to mobilise promptly via the formal development management forum demonstrating their commitment to the delivery of the site. A draft PPA is being discussed.

**h) Is the allocation of the SDS essential to ensure the soundness of the Plan?**

Yes. The allocation of the SDS will contribute to meeting the housing requirement identified in the plan in a sustainable manner whilst delivering community, education and recreation facilities. In light of the requirement identified, the allocation of the SDS is essential to ensure that the appropriate numbers of housing (market and affordable) are delivered in a timely manner whilst maintaining a balance with regard to environmental, amenity and sustainability issues.