

30 April 2020

The Savills logo consists of the word "savills" in a lowercase, sans-serif font, colored red, set against a bright yellow rectangular background.

LDP Team  
Planning Department  
Bridgend County Borough Council  
Civic Offices  
Angel Street  
Bridgend  
CF31 4WB.

By email: [ldp@bridgend.gov.uk](mailto:ldp@bridgend.gov.uk)

Laura Williams  
E: [ljwilliams@savills.com](mailto:ljwilliams@savills.com)  
DL: +44 (0) 2920 368905  
F: +44 (0) 2920 368999

2 Kingsway  
Cardiff  
CF10 3FD  
T: +44 (0) 2920 368 920  
[savills.com](http://savills.com)

Dear LDP Team

## **BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (LDP) - CANDIDATE SITE ASSESSMENT STAGE 2**

### **BRIDGEND COLLEGE PENCOED CAMPUS, PENCOED (REF. 219.C1)**

This letter has been prepared by Savills on behalf of Bridgend College in response to Bridgend County Borough Council's (BCBC) letter dated 17<sup>th</sup> December 2019 with regard to the Candidate Site Assessment Stage 2 as part of the preparation of the Replacement Local Development Plan (LDP).

As you are aware, Bridgend College is a Further Education (FE) College and the owner of the Pencoed College Campus which was submitted as a Candidate Site as part of the Call for Sites in November 2018 as a mixed use development (ref. 219.C1) and was shown as the sole Strategic Option for Growth within Pencoed in the Preferred Strategy document published for consultation in September 2019. This is welcomed by Bridgend College and commented upon further in the representations on the Preferred Strategy submitted in November 2019.

The request for further information is required by BCBC to ensure that it has all necessary and relevant technical documentation that is focussed on specific characteristics of sites and their deliverability. A comprehensive Candidate Site Submission Supporting Statement was submitted as part of the Call for Sites in November 2018 which included a series of technical reports (which were included as appendices to that document) relating to the site's technical suitability, deliverability, and viability. Further to ongoing, positive engagement with Officers, the following additional studies have been undertaken and are now submitted to BCBC to supplement previous information provided.

These documents are appended to this letter, as follows:

- Appendix 1: Design Report prepared by Austin-Smith:Lord, dated April 2020
- Appendix 2: Agricultural Land Classification and Soil Resources Report prepared by Reading Agricultural Consultants, dated March 2020
- Appendix 3: Transport Statement, prepared by WSP, dated April 2020

A High Level Viability Assessment, prepared by Savills, dated April 2020 is also submitted to BCBC but because this document is to be treated as confidential basis it is submitted as a separate and standalone document.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.  
Registered office: 33 Margaret Street, London, W1G 0JD



Taking each of these new documents in turn, please see below a short summary of their main findings.

### **Masterplanning & Design Report**

The Design Report, prepared by Austin-Smith:Lord, sets out the overall vision and key design and placemaking principles, which have informed the proposed indicative masterplan, and associated supporting framework plans, for the Site.

The vision is to create a high quality and sustainable development with a strong identity and sense of place, contributing to the delivery of housing needs within BCBC.

Edition 10 of Planning Policy Wales (December 2018) introduces the principle of “placemaking” as a mechanism to deliver on positive outcomes such as the well-being goals set out in the Well-being of Future Generations (Wales) Act 2015. This is at the forefront of the masterplanning process with the masterplan incorporating principles of placemaking by responding to the site’s unique characteristics to help create a community that is well connected and integrated with the local community. Connectivity and active travel strategies are promoted with pedestrian links to local employment opportunities such as the Pencoed Technology Park and town centre incorporated into the masterplan.

The Masterplan has been designed so that it can be delivered on all land owned by the College, should the Council owned land (currently used as 3G pitch and leased to Bridgend Football Club) not come forward as part of the wider proposals (though this would result in the relocation of the school element which would reduce overall housing numbers). The College will continue to work with the Council’s Estates Team to ensure, the optimum arrangement which sees the school developed on the Council-owned land, is deliverable. However, as noted above, there is a suitable fallback position should this land be excluded from detailed proposals.

The indicative masterplan shows that the Site can deliver:

- Up to 770 homes across a mixture of different types and tenures of housing. The masterplan shows higher densities (possibly in the form of apartments) closer to the A473 and lower densities closer to the site’s more rural eastern and southern fringes. The homes are arranged in clusters with a perimeter of houses of wide frontages to create a strong street presence and identity;
- A 1.25ha parcel of land to deliver a 1 form entry primary school to serve the development. There is potential for primary school to be a focal point for the community with out of hours community use of facilities.;
- The retention of the existing buildings at the campus to facilitate the College’s continued operation. The masterplan includes an element of expansion land to the north east of the college campus to allow for the further development of additional education facilities if required;
- Two site access points, one from the A473 to the north and a second from Felindre Road to the south. Within the development there will be a range of primary and secondary streets;
- A range of green and blue infrastructure measures. Blue infrastructure, in the form of swales and attenuation ponds, has an important SuDS role whilst green infrastructure forms public open space as well as having a landscape and ecology function;
- Various ecological mitigation measures including the retention of existing woodland and the strengthening of the north to south tree belt and formation of an east to west nature corridor.

## **Agricultural Land Classification**

The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It is the only approved system for grading agricultural land quality in England and Wales and is set out in the Welsh Office Agriculture Department 1988 guidelines and criteria for grading the quality of agricultural land (1988). Agricultural land in England and Wales is graded between 1 and 5, depending on the extent to which physical or chemical characteristics impose long-term limitations on agricultural use.

Best and most versatile (BMV) agricultural land is defined as Grades 1, 2 and 3a Planning Policy Wales (PPW) (Edition 10, December 2018) stating that the plan making and decision making process should give “considerable weight” to protecting BMV. There is a recognition that there may be a need for the redevelopment of some BMV land with Paragraph 3.55 of PPW setting the framework for where this may be acceptable:

*“Land in grades 1, 2 and 3a should only be developed if there is an overriding need for the development, and either previously developed land or land in lower agricultural grades is unavailable, or available lower grade land has an environmental value recognised by a landscape, wildlife, historic or archaeological designation which outweighs the agricultural considerations.”*

The Agricultural Land Classification and Soil Resources report prepared by Reading Agricultural Consultants concludes that the site contains a mix of Grades 3a, 3b and 4 as well as non-agricultural land uses. The land is not conventionally farmed or part of a farm business, rather is used for educational purposes in relation to the College’s agriculture curriculum.

The scope of the Survey was to consider the whole of Bridgend College’s ownership at the Pencoed Campus and accordingly it considers the existing buildings and sports pitches onsite and includes the approximately 6ha parcel of land on the western side of the A473 which is excluded from the proposed development area due to it partially being within Flood Zone C2 and in use as sports fields associated with the College.

Included within the Survey is a plan (reference RAC8671-2) illustrating the locations of the various grades of agricultural land which is accompanied by a supporting table. It found that 49% of the College’s land holding at the Pencoed Campus was be BMV (though exclusively Grade 3a) with the remaining 51% either non-agricultural or non-BMV grades. That said, the 6ha parcel of land on the western side of the A473 is classified as either non-agricultural or Class 3b, whilst the part of the campus including the 3G sports pitch and college buildings is classed as non-agricultural. It is therefore acknowledged that, other than sports pitches, the majority of the Site subject to the proposed built development is Class 3a and therefore the proposed allocation of the Site will result in the loss of BMV land. Paragraph 3.55 of PPW10, which requires the demonstration of overriding need for the development and that land in lower grade / brownfield land is not available or has over designations.

In demonstrating that the loss of BMV is acceptable and in accordance with the test set out in paragraph 3.55 of PPW10, it is noted that BCBC has committed to the preparation of a Replacement LDP which triggers a need to allocate land to ensure the housing requirement is delivered. There is an overriding social and economic need to deliver a sufficient housing land supply, and the proposed allocation of the Site is an important component to meeting this need. The Preferred Strategy identifies that, when the land bank, commitments, completions, and anticipated small site/windfall contributions are accounted for, there will be a need to allocate land for a further 2,942 homes.

Pencoed has a significant role in accommodating this growth. It is identified as a “Main Settlement” in both the adopted and the Replacement LDP Preferred Strategy, and identified in the Replacement LDP Preferred Strategy identifies as a Sustainable Growth Area.

The Preferred Strategy is explicit in what types of sites will form allocations in the Replacement LDP. This is most apparent in the identification of a series of Strategic Growth Options for each Sustainable Growth Area

and Regeneration Growth Area (of which the Pencoed Campus is identified), which indicates the intention to allocate a small number of larger sites, or strategic sites.

Bridgend College's Pencoed Campus is identified as the sole Strategic Growth Option for Pencoed whilst a review of the Candidate Site Register shows that the next largest candidate sites in Pencoed (refs. 87.C1, 297.C1, 298.C1, 303.C1, and 343.C1) are all of the site size and type that BCBC does not wish to allocate. Further, the adopted LDP sets a presumption against new development on the western side of the railway line in Pencoed, with Policy PLA 6 (Development West of the Railway Line, Pencoed) stating that development will not be permitted where it results in a net increase in vehicular movements pointing to fundamental constraints on the delivery of housing in this location.

When the above is taken together, it is evident that the RLDP prompts the need for additional housing to be delivered in Pencoed and that, from a strategic planning policy side, there is a desire for these to come forward to the east of the town and on a single large allocation (such as the Site) rather than on several smaller sites. To meet the aspirations of the Sustainable Growth Area therefore, it is clear that the Site is the most appropriate and suitable site for development within the area, and for Pencoed. Therefore, there is clearly the overriding need for this Site to be developed for the proposed residential-led allocation.

The loss of Grade 3a land on the Site resulting from its proposed development also is required by PPW to be considered in the wider context of possible deliverable and suitable sites for development, on the edge of Pencoed, which would meet the aspirations of the Preferred Strategy. However, as noted above, we do not consider there to be any other deliverable sites which offer potential alternatives sites to meet the identified need, and thus it is not appropriate to consider the agricultural value of, for example, land to the north of Pencoed.

It is also important to note that the use of the agricultural land to date is in relation to the operation of the College, rather than a farm business per se. Whilst the Site may contain elements of BMV, its location and existing use means that it currently is not used for agricultural purposes. The loss of BMV is clearly justified on the grounds for the need for the Site to be developed for the provision of new homes in the Pencoed Sustainable Growth Area, and thus can be allocated in the Deposit LDP in accordance with PPW10.

### **Transport Assessment**

A Transport Appraisal prepared by Opus was initially submitted as part of the Candidate Site Representations, which demonstrated that the Site was highly accessible by public transport, the private car, and by foot or bicycle, and contained a high level access appraisal which has informed the masterplanning process.

Since then WSP has had dialogue with representatives of BCBC Highways team with regard to the scope for a Transport Assessment in order to support this proposed allocation of the Site in the Deposit LDP. The lockdown period as a result of COVID-19 has meant that strategic transport network modelling which was to be undertaken by BCBC has been delayed until more normal levels of vehicular movements whilst any traffic counts undertaken by independent consultants at present would not be representative. There is also the potential for further fundamental change in the number of vehicular movement across the highway network as a whole in light of increased working from home and potential economic recession.

Accordingly, it has been agreed that a representative Transport Assessment cannot be undertaken at present and will therefore follow shortly after the next month which could be considered neutral. Dialogue will therefore continue between WSP and BCBC as to when this may be. In the meantime, as much information as possible towards achieving the full scope of the TA is provided in the enclosed document.

### **Viability**

Further to dialogue with Officers, further information is also submitted with regard to the Site's financial viability and this now reflects the latest masterplan proposals and further certainty about the quantum of development which could be delivered on the Site. To this end, please see attached a High Level Viability Assessment, prepared by Savills. This report concludes that the Site represents a viable, and therefore deliverable,

development having adopted reasonable assumptions and in accordance with the guidance provided by BCBC on undertaking the assessment.

As Officers are aware, Bridgend College has a serious intention to dispose of its surplus land so that it can be developed for the proposed mixed use scheme (and reinvest the value gained in improvements and new development elsewhere across the College's Estate). It is clear from the Viability Assessment that, after considering the high level costs, the value / return on the proposed alternative uses is sufficient to provide an uplift in land value sufficient for the landowner to sell the land. The Candidate Site Submission (October 2018) sets out how the release of the Site for residential development can enable the long terms success of the College.

### **Summary and Conclusion**

This letter has been prepared by Savills on behalf of Bridgend College, the owner of the Pencoed Campus which is shown as the sole Strategic Option for Growth within Pencoed in the Preferred Strategy document.

With a robust submission having made in the form of the Candidate Site Submission Supporting Statement (and associated appendices) during the Call for Sites in November 2018, the purpose of this letter (and its associated appendices) is to provide the further technical work detailed in BCBC's December 2019 letter. These reports are included as appendices and summarised above.

Notably, the masterplanning work undertaken has provided clarity on the quantum of housing which could be delivered on the Site, indicating that the Site should be allocated for up to 770 new homes. This will make an important and meaningful contribution to the Council's required housing land supply in the RLDP's plan period. Without prejudice to the detailed development proposal to progress in due course, this quantum of development could support the delivery of a new single form entry primary school, ideally (but not critically) on BCBC owned land adjacent to the site. As demonstrated in the Candidate Site submission, the findings of environmental and technical studies confirm that there are no significant constraints to the Site's development, and those known constraints (such as the presence of the gas main across the Site) can be planned around.

Bridgend College is committed to the promotion of this surplus land at Pencoed College and will continue to assist BCBC in demonstrating its technical acceptability and deliverability to enable its allocation within the emerging RLDP. As such, should you require any further information or clarification, then please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads "L Williams". The signature is written in a cursive, flowing style.

**Laura Williams**  
Associate Director