

BRIDGEND COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN EXAMINATION

Hearing Session 9 (Matter 9): Good Design and Sustainable Placemaking – Strategic Allocation at Land South of Bridgend (Island Farm) (Policies PLA2 and SP2(2)) and Housing Allocations at Parc Afon, Ewenny (Policy COM1(1) and Craig y Parcau, Bridgend (Policy COM1(2))

10.00am, Tuesday 22nd March 10:00 – 17:00

Submissions made on behalf of
HD Ltd (407) by Savills

The following statement has been prepared for Session 9 of the LDP Examination. The Inspector's questions are repeated before an answer (to those which are relevant) is provided. The following responses relate to Land South of Bridgend (Island Farm) which is considered in Policies PLA2 and SP2(2).

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)?

Island Farm is bordered to the northeast by the Bridgend Science Park, to the east by a nursing home, and to the southeast by the Bridgend to Llantwit railway line (the former Vale of Glamorgan Railway). The northern boundary of the site is formed by the A48 and the settlement of Bridgend beyond to the north as well as a cul-de-sac of houses at Island Farm Road and Island Farm Close. The site is bordered to the south by New Inn Road and to the west by Merthyr Mawr Road, beyond which lies predominantly agricultural land uses.

The Island Farm site has a total area of some 49.1ha and is under two ownerships; BCBC who own 13.3ha and HD Ltd who own the remaining 35.8ha.

The BCBC land is sited within the northern sector of the site immediately to the south of the A48 and formed part of the former Crossways Country Club and Second World War prisoner of war camp. A single storey building, the only surviving building from the camp (Hut 9) has been listed (Grade II) and is located in the northeast part of the site. The remainder of the BCBC owned land predominantly comprises scrub, rough grassland and treed habitat land. As explained below, all BCBC-owned land is designated as a Site of Interest for Nature Conservation, and, other than the proposed access from the A48, is not proposed for any built development.

The land within HD Ltd's ownership is located broadly to the south of the BCBC land and is used for agricultural purposes by a single tenant farmer and comprises a series of inter-connected in medium sized arable fields bounded by mature hedges, with the exception of the southwestern field which has been subject to extensive ecological enhancement measures (under the extant planning permission). A set of overhead power cables bisect the site running from east to west.

b) What is the proposed use of the SDS?

Policy PLA2 proposes that Island Farm is allocated for the following elements:

- 788 residential units (20% affordable)
- 1.8ha to accommodate a 1 Form Entry Primary School plus Co-located Nursery
- 4ha to relocate Heronsbridge Special Education Needs School

- Outdoor Recreation Facilities
- Leisure and ancillary commercial uses (B1)
- 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 generally free from constraints that could preclude development.

Whilst land under the ownership of BCBC is designated as a SINC, HD Ltd's land (where the built development is proposed) is not subject to any statutory or non-statutory ecology designations.

Likewise, the site is not subject to any local or national landscape designations and, whilst Hut 9 is Grade II listed, there are no listed buildings on the part of the site where built development is proposed, nor is this land within a conservation area.

The site is entirely within Flood Zone A and therefore considered at low or no risk of flooding.

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 have 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 considers Viability Assessments undertaken by Savills on behalf of HD Ltd in April 2020 (which also considered Craig-Y-Parcau) and May 2022.

This viability of the site was most recently appraised in the Updated Financial Viability Appraisals Addendum - Strategic Sites (SD83) prepared by Burrows-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 Island Farm, 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."

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

The Masterplan Report (SD126) and Masterplan (SD127) show the site as having capacity for 788 homes.

The extent of the site that can be developed for housing has been informed by an extensive understanding of the site's environmental and technical considerations and background (and in that case the site's planning history is useful as it means a lot is known about the site already).

The densities proposed (which range from 30dph to 60dph) are considered wholly appropriate, reflecting the site's lack of constraints, sustainability as a result of the facilities that will be created as a result of the development of the site, and accessibility.

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

Policies PLA2 and SP2(2) show the provision of a 1 form entry primary. Land is to be made available by HD Ltd but this is to be delivered by BCBC. This is shown in the Masterplan Report (SD126) and Masterplan (SD127). It is anticipated that the outline application for the Island Farm site would include the 1 form entry primary school.

Policies PLA2 and SP2(2) also make reference to a Special Educational Needs School which would replace the existing Heronsbridge facility. Land is to be made available by HD Ltd but this is to be delivered by BCBC. This is shown in the Masterplan Report (SD126) and Masterplan (SD127). It is understood that a Design Team has been appointed by BCBC and the planning application for this could either be progressed as part of the wider Island Farm site or as a standalone separate application.

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

HD Ltd has worked alongside BCBC with regards to the formulation of its Housing Trajectory.

SD37 "Housing Trajectory" shows that delivery of new homes at Island Farm can commence mid 2026/2027 with 68 homes delivered in the first year and 120 in the subsequent years. The site would therefore be delivered in full during the planning period.

This assumes an application for outline planning permission being submitted in Q3 2023, a decision issued in Q1 2024 (during which the site will be being marketed to secure a developer), 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.

HD Ltd has engaged BCBC in informal "Pre-Pre-Application" discussion and anticipates engaging BCBC in formal pre-application discussions in advance of the Hearing Session commencing.

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 housing requirement delivered in a timely manner whilst maintaining a balance with regard to environmental, amenity and sustainability issues.

The following responses relate to Craig-Y-Parcau which is considered in Policy COM1(2).

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 allocated site?

Craig Y Parcau consists of a 6.6ha parcel of land bound to the north by the A48, to the east by River Ogmore (and a public footpath running adjacent to it), to the south by New Inn Road, and to the west by mature trees. It is well screened from views from all directions due to strong tree and landscape infrastructure.

Running north / south through the centre of the site is a narrow 'ravine' holding a stream watercourse which acts to split the site. The western part of the site slope towards and drains into this. This part of the site is predominantly grassland.

The eastern slopes towards the ravine as well as from north down to south. The eastern part of the site consists of a large area of grassland as well as the former Craig Y Parcau boys home and the former Ty Afon former boys home which together have a combined floorspace of approximately 2,500sqm. These buildings are currently vacant and derelict, as was the former Llanerch Residential Home which was demolished for health and safety purposes following extensive fire damage. Part of the site is therefore previously developed land.

b) What is the proposed use of the allocated site?

Policy Com1(1) confirms that the proposed allocation is for approximately 108 homes across two different parcels alongside associated green and blue infrastructure. The proposed development at Craig Y Parcau could be accessed from the A48 roundabout with the B4622.

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

Land at Craig Y Parcau is free from constraints that could preclude its development.

It is not subject to any local or national statutory ecological or landscape designations. There are no listed buildings on the site, albeit there are two Grade II listed structures and a Scheduled Ancient Monument to the south east, approximately 200m from the centre of the site site.

The site is within Flood Zone A with the exception of a small strip adjacent to the River Ogmore (where no development is proposed) which is within Flood Zone B and Flood Zone C2.

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

Viability Assessments prepared by Savills were submitted in April 2020 (which also included Island Farm) and in May 2022 (which was standalone for Craig-Y-Parcau). These confirmed that the delivery of the Craig-Y-Parcau site was viable.

There is no specific Examination Document which comments on viability matters for just Craig-Y-Parcau. The Potential Strategic Sites Independent Financial Viability Appraisals Report (SD82) prepared by BHL which was published in March 2021 and has been prepared on the basis of a the April 2020 Viability assessment commented at Paragraph 5.9 that:

"In BHL's opinion, the site promoter has taken all reasonable steps at this stage in the Planning process to assess the likely abnormal and "opening-up" costs (including off-site infrastructure works) for this site."

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

The Masterplan Report (SD187) and Masterplan (SD188) show the site as having capacity for 108 homes.

The extent of the site that can be developed for housing has been informed by an extensive understanding of the site's environmental and technical considerations and background (and in that case the site's planning history is useful as it means a lot is known about the site already).

The densities proposed are considered wholly appropriate, reflecting the site's lack of constraints and accessibility.

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

HD Ltd has worked alongside BCBC with regards to the formulation of its Housing Trajectory (SD37).

The Housing Trajectory (SD37) prepared by BCBC shows that Craig-Y-Parcau can deliver its full capacity of 108 homes between 2025/2026 and 2027/2028.

This assumes an application for outline planning permission being submitted in Q3 2023, a decision issued in Q1 2024 (during which the site will be being marketed to secure a developer), and an approximately one 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.

HD Ltd has engaged BCBC in informal "Pre-Pre-Application" discussion and anticipates engaging BCBC in formal pre-application discussions in advance of the Hearing Session commencing.

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 housing requirement delivered in a timely manner whilst maintaining a balance with regard to environmental, amenity and sustainability issues.