## LDP

# Session 5 and 6 – Island Farm – Matters and Issues <u>Tuesday 27<sup>th</sup> and Wednesday 28<sup>th</sup> November 2012</u>

# Inspectors Agenda with Matters and Issues

## Introduction

The Island Farm Campaign For Action (IFCA) represents over 1000 residents of the locality who previously submitted through this group their objections to Bridgend County Borough Council when HD Ltd submitted plans to develop land at Island Farm. (Reference P/08/1114/OUT)

IFCA wishes to present the following observations on the proposed amendment to the Local development Plan by HD Ltd, to support its previous submissions which also reflect the concerns of local people. This submission concerns (1) the development of Island Farm particularly the impact on local residents and businesses and (2) the allocation of Green Wedge status.

## 1 ALLOCATION STATUS

## Land Use

The HD Ltd argument that there is a plentiful supply of employment land elsewhere in the County Borough.

## **Employment**

- a) The existing LDP states on page 46, "In July 2010, the Welsh Assembly Government's Economic Renewal: A New Direction, set out a national framework for economic development. One of the priorities is to develop a sector based, strategic approach to business support. The sectors identified, and therefore included in the Strategic Employment Sites uses are as follows:
  - ICT(electronics, software, services)
  - Energy and the environment(low carbon energy research, energy efficiency, energy storage, environmental management, research and consultancy)
  - Advanced materials and manufacturing(Automotive, aerospace and electronics)
  - Creative Industries(Digital, media, film, television, radio)
  - Life Sciences(Medical technology, diagnostic and trials)
  - Financial and Professional services.

It states that if Bridgend is to retain its competitive industrial base it is imperative that the area is able to offer a broad portfolio of sites. In addition to those Strategic Sites identified and safeguarded under Policy SP9, Policy REG2 aims to protect existing jobs and ensure that continued availability of a wide range of employment opportunities throughout the County Borough, by strongly resisting the redevelopment of allocated industrial land and buildings for alternative purposes.

It states that this is especially relevant when designated sites are located close to the strategic road network and have been vacant for a number of years. In such circumstances there is often pressure from alternative development proposals, notably from housing, retail and leisure. Furthermore Policy REG2 also recognises that such mixed use industrial areas operate more efficiently if there is an element of service provision for employees and their clients. It states that many sui generis employment uses do not fit neatly within close proximity to residential areas; but by their very nature are far better located on an industrial estate.

#### Observations.

- In our submission HD Ltd has failed to present any evidence or argument that would justify altering the allocation of land under the LDP to mixed-use. Whilst there may employment land elsewhere in the County, HD Ltd has not identified those that are equally as suitable as Island Farm for the types of strategic business identified by the Welsh Government above. The existing LDP has clearly identified the threats to such Strategic Sites and is there to protect them from indiscriminate unjustified development. To change the land allocation status to mixed-use would destabilise the balance achieved within the LDP for the region.
- The existing businesses on the Science Park fall within the categories set out in the Welsh Assembly Government's Economic Renewal: A New Direction. Any alternative development of a mixed-use type on adjacent land could detrimentally impact on those businesses that rely on the existing road infrastructure and environmental conditions to operate efficiently. Significant objections were raised by existing businesses on the site during the previous planning application.
- HD Ltd already has mixed-use permission within the outline planning permission on the land. This allowed a rugby stadium and training facilities together with other leisure, commercial and office use. Why does HD Ltd therefore need to amend the LDP? Unless of course, as objectors have suspected all along, that HD Ltd wishes to develop the land as alternative use, such as housing. The LDP already caters for the balanced development and provision of housing across the County Borough.
- In HD Ltd.'s previous planning application P/08/1114/OUT, much was made of the national interest shown by leisure and sporting business to invest in the site. No detailed evidence of commitment or interest was ever presented to the Planning Authority and it is clear that none existed because the investment hasn't materialised. Exactly what type of use does HD Ltd propose for the site should it be allocated mixed-use status. On April 30<sup>th</sup> 2009 Mr Hegarty of HD Ltd stated in the Glamorgan Gazette, "Funding issues and more detailed drawings will be addressed once we have gained outline planning permission, hopefully in December." Since that time no such detail has been provided. HD Ltd never had the capability or capacity to develop the land as a Strategic Employment Site as they promised and upon which the

BCBC approved outline planning permission. It would be wrong to change the allocation status of the land in order to cater for the limited financial capacity and capability of HD Ltd.

## 2 ROAD ACCESS

The surrounding roads namely the A48, Ewenny Road, Merthyr Mawr Road, New Inn road and Ewenny Roundabout, were never designed or adapted to service the current volume of traffic. The Highways own road traffic report clearly indicates considerable increases in traffic flow, especially at peak commuter, weekend and holiday periods.

## Observations

- Road access to the site is dependent on the completion of the Section 106 agreement for improvements to the A48. The requirement of this agreement should exist whether the site is for Strategic Employment or mixed-use. What evidence is there of HD Ltd commissioning work on this aspect of their application? Our recommendation is that this should be completed prior to any amendment of land allocation is considered. The original phasing for this aspect of the plan was 4 to 6 months. The Section 106 Agreement which completes P/08/1114/OUT was agreed in March this year and there has not been any progress by HD Ltd. What is to stop HD Ltd waiting until the A48 is developed under SEWTA planned prioritisation as part of the A48 dualling between Waterton and Laleston at considerable cost to the public purse?
- The internal spine road of the previous application ran from Ewenny Road through the Science Park and was positioned very close to houses on Island Farm Road and Island Farm Close. The plans were very detailed and formed part of the application which was approved in outline. Despite objections from residents and businesses on the Science Park, HD Ltd chose not to respond and didn't alter the plans put before council. With a potential change of use of the land these road infrastructure plans could have an even greater detrimental impact on residents and businesses. With mixed-use allocation the volume of traffic is likely to be greater and more constant at peak times. This will affect the finely balanced situation with regard to air pollution which has already been subject to review at Ewenny Roundabout as a result of the impact on residents. It will also potentially increase the noise pollution affecting the quality of life for residents on Ewenny Road, Island Farm Close and Island Farm Road.

# 3 SITE OF IMPORTANCE FOR NATURE CONSERVATION (SINC)

Observations.

- We support with the concerns expressed by the Countryside Council for Wales submitted in Session 5 in relation to the natural environment.
- The SINC land should be excluded from the allocation.

## 4 GREEN WEDGE

The Island Farm Campaign for Action (IFCA) has previously submitted its views on the Green Wedge allocation.

The land which HD Ltd seeks to extend the settlement boundary extending to Merthyr Mawr Road South and New Inn Road is currently agricultural land, some of the land is Grade 2 and 3A. HD Ltd has repeatedly tried to emphasise the low grade value of this land. Yet the current farmer has been able to produce two crops per year for the last four years of high yield, and crops have recently been planted for 2013. This land falls within and outside the current settlement boundary.

Should the settlement boundary be extended not only will there be a loss of rich arable land but also the potential for significant intrusion in to the countryside and loss of open space. At least with sporting and leisure facilities the green and open nature of the sight sitting in an area of outstanding natural beauty would be in some way retained.

Local people and country sports enthusiasts who use these fields outside the existing settlement boundary report the regular appearance of deep swallow holes in the fields. In October 2012 a hole measuring six feet width and 12 feet deep appeared over night after ploughing had occurred.

## Observation.

- How appropriate is the area outside the current settlement boundary to develop for mixed-use? It was previously assigned as a site within a Sand and Gravel Resource Safeguarding Area in the UDP. The existence of swallow holes would suggest the presence of sand deposits and underground water ways transgressing the land. This area should be protected within the LDP should there be any future requirement to extract those resources.
- The land outside the current settlement boundary is unallocated ("white"). It had previously been 'earmarked' as Green Wedge by the Inspector for the current UDP. It was only a political decision by the then Leader of BCBC Jeff Jones that removed the land as Green wedge from the UDP in 2003. Notwithstanding the existing outline planning permission on the land the Green Wedge allocation should be allocated to protect the rural nature of the countryside and ensure that the historic nature of the Merthyr Mawr countryside is retained for generations to come to enjoy.
- There should be no deviation from the current settlement boundaries.