

22 January 2013



Mr Robert Mellor
Planning Inspector

c/o Nicola Gandy
Programme Officer
Bridgend Local Development Plan Examination
Innovation Centre
Bridgend Science Park
Bridgend
CF31 3NA

Christopher Potts
E: cpotts@savills.com
DL: +44 (0) 2920 368901
F: +44 (0) 20 7016 3749

Lansdowne House
57 Berkeley Square
London W1J 6ER
T: +44 (0) 20 7499 8644
savills.com

Dear Sir

**Bridgend Local Development Plan Examination - Action Points and Schedule of Matters Arising Changes
Hearing Session 6 – Island Farm Bridgend**

Please find enclosed a response to your note which sets out a series of action points which followed Hearing Session 6 – Island Farm, Bridgend.

There are four separate action points whereby you have indicated that BCBC and HD Ltd should seek to agree common ground. Savills, on behalf of HD Ltd, has exchanged comments on these action points as requested and have agreed common ground on two of the action points – 6.7 and 6.10. However, we have not been able to agree common ground on action points 6.8 and 6.9. These action points relate to the draft wording of Policy COM16 and the PLA3 supporting text.

BCBC is concerned that HD Ltd's proposed wording allows for too much flexibility and is considered by BCBC to contribute to the uncertainty over the permitted scheme being delivered. As noted in the attached document, HD Ltd's position has not changed insofar as the allocation of the site needs to reflect the planning approval. The reason for the suggested wording is to reflect that Development Plans highlight the land use issues (which our wording achieves) and is not meant to go into prescriptive detail. Rather, it will allow for flexibility in the development of the size and components of the sports and leisure facilities so that, if necessary, the proposals can respond to changing sporting demands and sports occupier requirements. Therefore, BCBC's comments about the 'uncertainty of delivery' are unwelcome and cannot be concluded as a result of our suggested policy wording. As referred above, we have addressed the land use phrasing which we believe better suits the policy text. You will recall the numerous comments made at the examination about a commitment to delivery (which Mr Llewelyn at BCBC confirmed).

HD Ltd has also sought to ensure that the fallback position (to retain the site for strategic employment uses) as proposed by BCBC is clarified in both the supporting text to policies COM16 and PLA3 – as set out in the attached document.

It is unfortunate that we have not been able to agree common ground on these minor outstanding matters. However, I trust that our comments and justification is clear and reasonable. Please do not hesitate to contact me should you have any further queries.



Yours faithfully



Christopher Potts
Director

**Bridgend County Borough Council
Bridgend Local Development Plan Examination**

Action Points and Schedule of Matters Arising Changes (MACs)

Hearing Session 6 – Island Farm Bridgend

Action Point 6.7: Re: Option 2a(ii) **(BCBC and HD Ltd should seek to agree common ground)**

BCBC and HD Ltd to comment on whether the employment element should be listed under Policy SP9 or REG1 and, if included under REG1, what business uses should be listed (the parties should seek to agree common ground).

HD Ltd Comments

HD Ltd are aware BCBC maintains its position that the employment element on Island Farm should remain within Strategic Policy SP9 with the policy amended to reflect the 6.56 hectares of employment land proposed to be delivered as part of the approved mixed-use scheme.

HD Ltd support the proposed amendment to Strategic Policy SP9(2) to take account of reduced area of employment land. Providing that Option 2a is pursued then HD Ltd is comfortable that the employment element of the proposals at Island Farm is allocated under Strategic Policy SP9. **We therefore agree the above as common ground.**

MAC Reference	Location in LDP	Details of Change	Reason for Change												
MAC6.3	Strategic Policy SP9	<p>Amend the development area for Island Farm detailed under Strategic Policy SP9:</p> <p>The following strategic sites are allocated for employment purposes:</p> <table data-bbox="571 1114 1523 1252"> <tr> <td>SP9(1)</td> <td>Brocastle, Waterton, Bridgend;</td> <td>46 Hectares</td> </tr> <tr> <td>SP9(2)</td> <td>Island Farm, Bridgend;</td> <td>41 6.56 Hectares</td> </tr> <tr> <td>SP9(3)</td> <td>Pencoed Technology Park;</td> <td>5 Hectares</td> </tr> <tr> <td>SP9(4)</td> <td>Ty Draw Farm, North Cornelly.</td> <td>6 Hectares</td> </tr> </table> <p>Matters Arising Change 6.3 will have consequential impacts on other areas of the Plan and Background Papers.</p>	SP9(1)	Brocastle, Waterton, Bridgend;	46 Hectares	SP9(2)	Island Farm, Bridgend;	41 6.56 Hectares	SP9(3)	Pencoed Technology Park;	5 Hectares	SP9(4)	Ty Draw Farm, North Cornelly.	6 Hectares	Amended Strategic Policy SP9 to take account of reduced area of strategic employment land.
SP9(1)	Brocastle, Waterton, Bridgend;	46 Hectares													
SP9(2)	Island Farm, Bridgend;	41 6.56 Hectares													
SP9(3)	Pencoed Technology Park;	5 Hectares													
SP9(4)	Ty Draw Farm, North Cornelly.	6 Hectares													

Action Point 6.8: Re: Option 2a(iii) (BCBC and HD Ltd should seek to agree common ground)

HD Ltd and BCBC to suggest how an allocation policy and supporting text should be worded in respect of sports and leisure facilities. (the parties should seek to agree common ground).

HD Ltd Comments

HD Ltd and BCBC have not agreed common ground in relation to this action point. The wording of the policy suggested by BCBC provides too much detail and does not allow for any flexibility in the size and type of recreational and leisure uses proposed. HD Ltd's proposed policy wording is suggested below.

HD Ltd's position has not changed insofar as the allocation of the site needs to reflect the planning approval. The reason for the suggested wording is to reflect that Development Plans highlight the land use issues (which our wording achieves) and is not meant to go into prescriptive detail (which BCBC's suggested wording does). A degree of flexibility in the wording is required should the composition and amount of sports and leisure facilities change, for example the capacity of the a stadium may change, the number of tennis courts may vary or the use of a 4G surface may become outdated by more advanced pitch technology.

HD Ltd have also sought to add greater clarity to the wording suggested in paragraph 6.2.26. This text recognises that any fallback position should not be for a use which there may be no evidence base.

MAC Reference	Location in LDP	Details of Change	Reason for Change
MAC6.4	Insert after para 6.2.25	<p>Insert the following policy and supporting text after paragraph 6.2.25:</p> <p>Policy COM16</p> <p>Island Farm Recreation and Leisure</p> <p>Land at Island Farm is allocated for mixed use development, comprising of the following recreation and leisure uses:-</p> <ul style="list-style-type: none"> • Sports stadia ranging from 2,000 up to 15,000 seats in size with additional ancillary pitches training pitches; • an indoor tennis centre plus outdoor courts; • an indoor training pitch and sports hall offering a range of sports; • an indoor swimming within the Sports Centre; • ancillary offices and uses; and 	New Policy and supporting text for the Island Farm mixed-use development

		<ul style="list-style-type: none"> a 16.7ha (41 acre) of SINC area safeguarded for nature conservation. <p>6.2.26 The site forms part of a mixed use scheme for recreation, leisure and strategic B1 employment purposes as defined by Policy PLA3(21) and reflects the planning status of the site at the time of the adoption of the LDP. A large proportion of the site was previously allocated solely for strategic employment purposes, however the application was granted consent as the scheme was considered to be of strategic value for the County Borough. However, should the recreational and leisure facility (or any elements) not be delivered for any reason and providing that there is an up to date evidence base to demonstrate there is a requirement for additional strategic employment land, the Council may require the site (or parts of the site) to be retained for future Strategic Employment purposes on the parts of the site located within the settlement boundary.</p> <p>*Note to Inspector: If it is confirmed that the settlement boundary is to be drawn to reflect the built elements of the recreation and leisure proposals (the main stadia, tennis centres and courts centre) as discussed at the Hearing Session. Only the pitches along the southern boundary and the SNIC are to be located outside of the settlement boundary.</p>	
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Action Point 6.9: Re: Option 2a(v) (BCBC and HD Ltd should seek to agree common ground)

HD Ltd and BCBC may suggest wording for the necessary PLA3 supporting text at LDP Appendix 1 (the parties should seek to agree common ground).

HD Ltd Comments

HD Ltd have suggested that additional clarity on the fallback position is provided in the supporting text which has been drafted by BCBC (but draws closely on the suggested text HD Ltd have previously suggested in their representations).

MAC Reference	Location in LDP	Details of Change	Reason for Change
MAC6.5	Appendix 1 of LDP	Additional text is proposed to be added to Appendix 1 of the LDP as contained in Appendix A of this document.	Provide clarity and consistency with PLA3 allocations.

Action Point 6.10: Re: Option 2b

Would HD Ltd and BCBC please provide a figure for the net site area of the mixed use permission that is available for sports and leisure development after deducting the area for employment and roads and for nature conservation mitigation (the parties should seek to agree common ground).

HD Ltd Comments

The net site area of the mixed use permission that is available for sports and leisure development approximately 27.2 hectares. This excludes the area for employment and roads and for nature conservation mitigation which is approximately 24.6 hectares as shown in Appendix B.

This is agreed common ground with BCBC.

Appendix A

1.21 PLA3(21) Island Farm, Bridgend

Mixed Use Components	Total Area 51.8 Hectares		Implementation and Funding Source
Policy Reference	Type	Amount	
SP9(2)	Strategic Employment	6.56	Implemented and funded through the private sector (including Section 106)
COM16	Recreation and Leisure	45.24	
PLA8(5)	Access to Island Farm	TBC	

A1.21.1 Island Farm is a prestigious greenfield site, of approximately 52 hectares, located in an accessible location along the A48, adjacent to the Bridgend Science Park, 8km from junctions 35, 36 and 37 of the M4 Motorway. The site is the focus of a sports-led mixed use regeneration and benefits from planning permission for mixed use – recreation / leisure / commercial / offices. In accordance with the planning permission, it is anticipated that the site will deliver sports stadia, an indoor tennis centre, a sports centre, community uses, commercial uses, offices, a park and ride facility and SINC. When developed, a new access to the site will be required off the A48.

A1.21.2 The mixed-use proposal will enable the Island Farm strategic employment allocation to be developed as a subsequent phase and logical extension to the existing highly successful and prestigious Bridgend Science Park. Furthermore, located as it is in south-west Bridgend it serves an area of recent significant residential development at Broadlands, which lacks any significant employment opportunities. Whilst under policy SP9(2), 6.56ha of the site is allocated for strategic employment uses, [should the recreational and leisure facility \(or any elements\) not be delivered for any reason and providing that there is an up to date evidence base to demonstrate there is a requirement for additional strategic employment land, the Council may require the site \(or parts of the site\) to be retained for future Strategic Employment purposes on the parts of the site located within the settlement boundary.](#)

A1.21.3 Part of the site comprises of a former Prisoner of War camp, a listed building, which is to be retained. There would be a requirement for high quality landscaping and architectural design. There is also a need to protect and enhance the existing biodiversity value of the site, ensuring appropriate provision for, and protection of, existing wildlife in the area – and therefore a 16.7ha SINC is to be safeguarded for nature conservation.

Appendix B