

REFERENCE: P/18/945/FUL

APPLICANT: Hafod Housing Association & Jehu
c/o WYG Planning & Environment, 5th Floor, Longcross Court, 47
Newport Road, Cardiff CF24 0AD

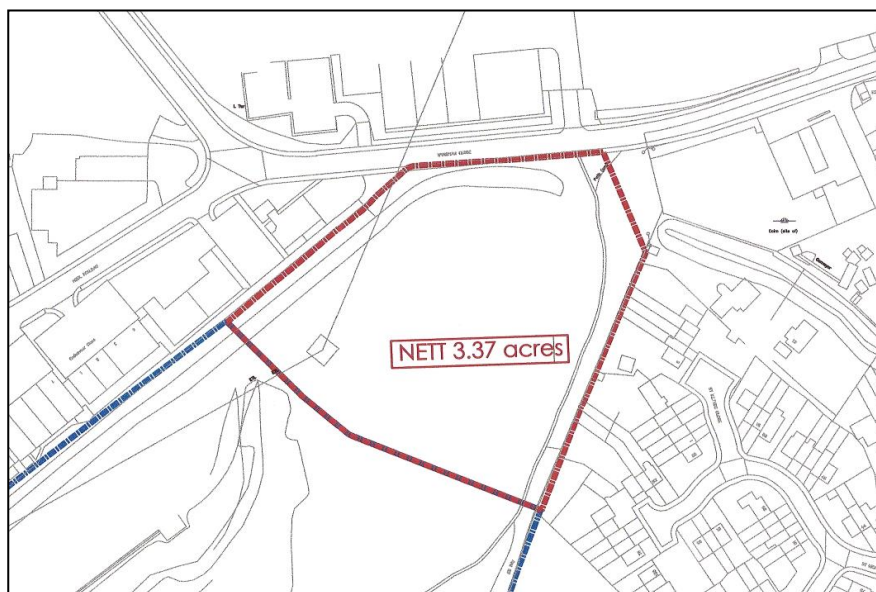
LOCATION: Land south of Wyndham Close Brackla Industrial Estate CF31 2AN

PROPOSAL: Erection of 41 affordable residential dwellings, with associated on site car parking, access arrangements and associated works.

RECEIVED: 29 November 2018

APPLICATION/SITE DESCRIPTION

This full planning application relates to the proposed development of 41 affordable residential dwellings with associated car parking and access arrangements on a site that measures approximately 1 hectare and encompasses a section of undeveloped land on the eastern edge of Brackla Industrial Estate, fronting Wyndham Close with existing residential properties on St Michael's Way and St Illtyd's Close, immediately adjoining the eastern boundary (see Plan 01 below). The site lies at between 57m and 72m AOD, sloping from south to north, is formed of two plateaus which has been recently cleared, exposing largely bare ground with areas of grassland, dense scrub, broad-leafed woodland (north and south eastern corners) and some scattered trees.



Plan 01 Site Location Plan

Land use in the surrounding built environment can be characterized as a mixture between the two dominant land uses of residential settlements to the east and commercial/light industrial/warehousing uses to the north and west as part of the Brackla Industrial Estate. An area of greenspace is situated to the south of the proposed development site, forming the designated 'Brackla Ridge and Associated Area'. This area of greenspace primarily comprises woodland.

The proposed development will deliver 41 affordable homes comprising of:

- 13 one-bed flats
- 18 two-bed houses
- 9 three-bed houses
- 1 four-bed house

Plan 02 Site Layout Plan (as Amended received on 23 April 2019)



Access will be off the existing highway (Wyndham Close) at the site's northern border. Pedestrian access will also be from this point. A 5.5m wide carriageway with 2m wide footways on each side will serve the site with the access achieving in excess of 2.4m x 90m visibility splays onto Wyndham Close. Car parking spaces will be provided in front of and between properties. The parking provision for the one-bed flats and two-bed houses seeks to achieve the maximum parking requirement as set out in the Council's Supplementary Planning Guidance – SPG 17 Car Parking Standards. The proposed two-parking spaces for each of the three and four-bed properties is below the maximum requirement of 3 spaces per property. The Transport Statement that accompanies the application suggest this reflects the lower than average car ownership rate that is evident in social housing developments. Furthermore, census data for Bridgend shows that only 7% of social rented households have two or more cars whereas the equivalent figure for the whole County Borough is 34%. Five visitor car parking spaces are provided within the development with it anticipated that additional visitor parking could be accommodated informally on-street within the development.

The housing layout comprises mainly a mix of two storey semi-detached and link properties with direct access to a standard road design including a 5.5m wide carriageway and footways. The flatted accommodation will occupy units in the southern part of the site which includes a three storey 'L' shaped building, all of which will have their own drives, parking and turning areas. Garden areas will be provided for all accommodation and will achieve the Welsh Government Design Quality Requirements in terms of area.

The application has been accompanied by the following plans and visuals:

LT1812.00.01 – Site Location Plan
LT1812.00.03 – Existing Site Sections
LT1812.04.01 – Site Layout
LT1812.04.02 – Site Boundary Treatment
LT1812.04.03 – Boundary Treatment Details
LT1812.04.04 – Proposed Site Sections
LT1812.04.05 – Site Block Plan
LT1812.04.06 – Bin Store Detail
LT1812.04.100 – Plans & Elevations – Plots 1-3
LT1812.04.101 – Plans & Elevations – Plots 4-6
LT1812.04.102 – Plans & Elevations – Plots 7-9 & 15-17
LT1812.04.103 – Plans & Elevations – Plots 10
LT1812.04.104 – Plans & Elevations – Plots 11-14
LT1812.04.105 – Plans & Elevations – Plots 18-19 & 29-30
LT1812.04.106 – Plans & Elevations – Plots 20-28
LT1812.04.107 – Plans & Elevations – Plots 31-34
LT1812.04.108 – Plans & Elevations – Plots 35-37
LT1812.04.109 – Plans & Elevations – Plots 38-39
LT1812.04.110 – Plans & Elevations – Plots 40-41

The application has also been accompanied by a series of reports and supporting documents that have sought to address a number of matter including transport, archaeology, ground conditions, ecology, dust, odour and noise. The documents are listed as follows:

- Ecological Assessment – Wyndham Close, Brackla Industrial Estate by David Clements Ecology Ltd dated May 2018
- Archaeological Desk Based Assessment by Cardiff Archaeological Consultants dated April 2018
- Drainage Strategy by Vale Consulting dated September 2018 and Technical Note dated 11 February 2019
- Environmental Noise Assessment by Acoustic Consultants Ltd dated October 2018. Additional reports submitted April 2019, May 2019 and July 2019.
- Transport Statement by ACSTRO dated October 2018
- Dust and Air Quality Assessment by Air Quality Consultants dated June 2018
- Desk Study Report (Ground Conditions) by Integral Geotechnique dated December 2017
- Site Investigation Report by Integral Geotechnique dated March 2018

In accordance with the Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 a pre-application consultation was undertaken during October – November 2018, allowing the relevant owner/occupiers, community and specialist consultees the opportunity to comment on the proposal. All responses to the consultation have been recorded in the PAC report which accompanied this application. The content of this pre-application consultation report demonstrates that a robust pre-application

consultation process has been undertaken to ensure the content of the application is suitable.

RELEVANT HISTORY

No recent applications are recorded on the planning history.

PUBLICITY

The application has been advertised on site.

Neighbours have been notified of the receipt of the application.

The period allowed for response to consultations/publicity has expired.

CONSULTATION RESPONSES

Coity Higher Community Council (Speaker) – Object for the following reasons:

All construction traffic must access the site via the industrial estate and not from Heol Simonston or Brackla

There is no obvious inclusion of an equipped play area and the proposed play area at Trem y Castell/Gerddi Castell has not yet been constructed. Either a play area should be provided or BCBC must construct the new play area before the houses are occupied.

Is there S106 money put aside to construct the short length of footpath, crossing point and associated signage to link the Simonston hamlet to the existing footpath network?

Councillor Amanda J Williams (Local Member) - There are a number of conditions that I feel should be included in this application. Traffic is already a concern on Heol Simonston and needs to be considered in greater detail before allowing further traffic into the mix. Firstly all construction traffic should be controlled and the condition added that it should not access the site from Heol Simonston. In addition to this, S106 money should be sought to include a short pavement, crossing point and subsequent signage to link the Heol Simonston hamlet as any increase in traffic will significantly impact on the residents of these houses and make it more difficult for them to exit their road safely by foot and by vehicle.

I am also concerned regarding the lack of play facilities. I understand that S106 funds have been secured from the neighbouring housing but there is no park in place and no idea of when this will be commenced. Residents are always left waiting and an agreed date for the commissioning of this park needs to be confirmed in order to benefit all the residents prior to the occupation of any houses. If not then additional play facilities should be provided by the developer and included in the application.

Transportation and Development – An objection has been raised as, in the absence of adequate off-street parking facilities, the development would generate additional on-street parking to the detriment of highway safety.

Dwr Cymru Welsh Water Developer Services (DCWW) - No objection subject to conditions and informative notes to ensure that the surface water from the site does not connect to the foul sewer, as per the submitted drainage strategy. The applicant will also need to apply to DCWW for any connection to the public sewer under s106 of the Water Industry Act 1991.

Land Drainage Officer – It is noted that the applicant intends to dispose surface water to a private sewer. An objection to the proposal is maintained until the applicant obtains the permission of the owner of the private sewers to allow the connections to be made.

Shared Regulatory Services – Land Contamination - No objection subject to conditions.

Shared Regulatory Services – Public Protection (Noise) – Latest comments dated 12 August 2019:

‘Further to the comments already made dated the 20th May 2019 and the subsequent submission of Environmental Noise Assessment 7184/BL Revision C, dated the 12th July 2019 please find enclosed my considered comments:

Section 8.1 of the Environmental Noise Assessment describes the methodology used to model the noise of the specific sound levels from the three identified sources of industrial noise. In relation to BEI Lighting it is stated that “*As such we have assumed this noise source is operating for 30 minutes per hour period.*” This 50% onset time allows the reduction of the noise in the model from this source by 3dB. No justification for this reduction is provided in the report. In relation to the “Timber Merchants” it is stated that “*As such we have assumed this noise source is operating for 15 minutes per hour period. This is considered reasonable based on site observations.*” This 25% onset time allows the reduction of the noise in the model from this source by 6dB. Despite stating that “This is considered reasonable” no evidence has been provided of any planning restrictions that require the “Timber Merchant” to limit noisy operations to 15 minutes in every hour.

And finally in relation to Dragon Laser, it is stated that “As such we have assumed this noise source is operating for 30 minutes per hour period. This is considered reasonable based on site observations. This 50% onset time allows the reduction of the noise in the model from this source by 3dB. Despite stating that “This is considered reasonable” no evidence has been provided of any planning restrictions that require Dragon Laser to limit noisy operations to 30 minutes in every hour. The way that the On Time of the industrial noise sources has been considered has the potential of significantly underestimating the rating level and therefore the level of mitigation required at the site to deal with industrial noise. When this underestimation is added to the statement in Section 9 “*All predictions are in any event subject to a degree of tolerance of normally plus or minus 3 decibels*” the conclusions presented by the report may be significantly different to those presented.

Overall Judgement of the Scheme

Despite the comments relating to the BS4142 assessment above, the noise mitigation scheme that has been proposed by the Environmental Noise Assessment involves the erection of an acoustic barrier around nearly all of the site, varying in height from 2.0m to 2.5m at plots fronting Wyndham Road. In addition it is understood that uprated acoustic glazing is required for every façade within the development with greater protection required for the plots facing Wyndham Road. It is also understood that additional ventilation is required in each habitable room within the development so that the sealed façades comply with the ventilation requirements of the Building Regulations. While the technical solutions are feasible and the resulting noise levels comply with the various standards, the resultant residential units will be sealed to the outside world and will be behind 2.0m or 2.5m acoustic fences.

Shared Regulatory Services – Public Protection (Air Quality) – No adverse comments.

Biodiversity Policy and Management Officer – has reviewed the Ecological Assessment that highlights a number of ecological features/constraints on site or adjacent to the site. There are a number of concerns relating to the following:

- The current layout does not compensate for the loss of the species-rich grassland. The layout plan includes areas of landscaping around the edges of the site which should be laid out to species-rich grassland to promote habitat connectivity.

- A number of trees in the survey have bat roost potential. It is unclear whether any trees will be affected by the proposal. Should trees be felled then further surveys should be undertaken to support the application.
- A Wildlife Protection Plan should be produced for site clearance and construction stages
- A 5 year Biodiversity Management Plan for all habitats within the site boundary should be drawn up for approval by the Local Planning Authority.

Natural Resources Wales – Significant concerns with the proposed development as submitted and the loss of trees and potential bat roosting opportunities. We recommend that you should only grant planning permission if the scheme can meet the following requirements and you attach the condition listed below:

Clarification on whether any of the trees identified with moderate or higher bat roosting potential are to be removed or affected to facilitate the development and if so further survey work to be carried out on any trees to be removed or affected
Submission and agreement of a Construction Environment Management Plan

Glamorgan Gwent Archaeological Trust – The proposal has an archaeological restraint and the application has been accompanied by a Desk Based Assessment prepared by Cardiff Archaeological Consultants. GGAT concur with the recommendations in the report and request that a condition be imposed requiring the applicant to submit a detailed written scheme of investigation for a programme of archaeological work to protect the archaeological resource.

South Wales Police – Designing out Crime Officer – has provided detailed comments with a view to the development obtaining the Secured by Design (SBD) Award which it is required to achieve to comply with the Welsh Government’s Development Quality Requirements (DQR) for grant funded social housing projects. Generally the site layout is compliant although minor changes to include side facing windows overlooking parking spaces is recommended.

REPRESENTATIONS RECEIVED

The occupier(s) of the following addresses have submitted their concerns/objections to the scheme:

Mr Anthony Williams – c/o Camplas Technology – Brackla Industrial Estate
 TW Joinery (S Wales) Ltd – Brackla Industrial Estate
 Paul Matthews & Son Ltd – Brackla Industrial Estate
 Milton Green Limited – Brackla Industrial Estate
 Esther Holt – 10 St Illtyd’s Close, Brackla
 Nathan Goldsworthy – 13 Min Y Coed, Brackla
 David & Lydia Sheppard – 46 St David’s Close, Brackla
 Angela Amesbury – 42 St David’s Close, Brackla
 Mr Marc Barbour – 2 St Illtyd’s Close, Brackla

The following is a summary of the representations received:

1. Re-designating land from employment purposes to residential purposes is contrary to development plan – there is a shortage of land for job creation in the area – undesirable for housing to be constructed close to busy industrial estate roads
2. Development will result in the removal/partial removal of the Brackla Ridge – the natural green wedge between the housing and industrial estates – continued erosion of green space

3. Insufficient provision of equipped play area in the vicinity – no space for dog walkers – the Council should be trying to save green areas
4. The existing public right of way has not been accommodated as part of the development – the route is well used and is recorded on maps.
5. Existing road infrastructure serving Brackla estate will not be able to accommodate additional traffic
6. Development will affect private access to the rear of existing properties
7. The new housing would be exposed to unacceptable levels of noise from the heavy traffic using the Brackla Industrial Estate, as demonstrated by the noise report. On the basis of national policy, the application should be refused. Mitigation is proposed but this could also involve restricting the hours of operation for existing businesses.
8. Prevailing winds will cause fumes from adjacent commercial operations to pass over existing residents.
9. Activities associated with new housing (traffic, movement of people etc.) will result in a disturbance to existing residents
10. Outlook and view will be affected by new housing which will be constructed on land that is slightly higher level
11. Social housing – potential for crime rates to rise locally
12. Invasive species on land will have to be properly managed to ensure it is not dispersed onto adjoining land
13. Properties will be devalued as a result of the development

A petition signed by 25 employers/employees of businesses on Brackla Industrial Estate has been received opposing the development for the following reasons:

1. The land is part of the Brackla Industrial Estate (formerly MOD Bridgend Arsenal) and has been reserved for industrial and commercial purposes since the end of World War II
2. The land is reserved as a 'Green Wedge' in the adopted Bridgend Local Development Plan to avoid conflict between the residents of the Brackla Housing Estate and Brackla Industrial Estate in the interests of maintaining employment and creating jobs
3. The removal of this protection would put 300 jobs at risk on the Brackla Industrial Estate
4. It is highly undesirable that residential housing should be built on an industrial estate with a high volume of heavy machinery, fork lift trucks and HGVs etc. with the inevitable risks particularly to children who have direct access to the estate roads.

Councillor Tom Giffard is concerned that the Members for Brackla have not been consulted on the application.

Communications have also been received from Hafod Housing Association and WYG in support of the application which are summarised below:

Hafod Housing Association maintain that the application was prepared and submitted on the back of the Authority's positive pre-application response and are disappointed in what they consider to be a 'U-turn' in the Council assessment of the appropriateness of the delivery of affordable homes on the application site. The proposed development will provide much needed high quality, DQR compliant affordable housing for the residents of Bridgend against a shortfall in land supply and affordable housing. Furthermore, the Authority's Housing Strategy team support the principle of locating affordable housing on this site through earmarking Social Housing Grant (SHG). Hafod's Management Team considers the application site to be an appropriate location that is broadly compliant with the placemaking principles set out within Planning Policy Wales 10. In the light of the Minister for Housing's recent letter which addresses the affordable housing crisis, the Housing Association request that the Authority take a pragmatic view and support this 100% affordable housing scheme.

A summary of the applicant's agents supporting letters and comments that specifically reference the issue of pre-application advice, noise and 'Active Travel' is provided below:

- The LPA have previously acknowledged that the development is compliant with Policy SP2 which resulted in the submission of the application. Our detailed Placemaking Note has not been fully assessed and balanced alongside the AM's recent letter placing a responsibility on Authorities to deliver affordable housing as a priority.
- That the proposed approach of closed windows is accepted on 1000s of schemes in Wales (as demonstrated at a local level within BCBC by other similar schemes that have been approved). The LPA appears to be adopting a completely different stance on this matter to other planning applications (approved against the LDP) where there was a noise matter to balance. Specifically why the LPA have allowed the Taylor Wimpey development immediately to the north when the noise position for this site is essentially the same?
- The site is located within the Bridgend Strategic Regeneration Growth Area and adjacent to land contained within the North East Brackla Development Brief – which looks to deliver a mixed use centre within walking distance of the site. The development of this adjacent brown field site for a high-quality residential scheme will assist the regeneration aims for the wider area.
- The Council's Housing Strategy team support the principle of locating affordable housing on this site through earmarking SHG –there is this clear disconnect between Housing Strategy supporting the development of affordable housing on this site and the opposite position the LPA have only recently adopted.

COMMENTS ON REPRESENTATIONS RECEIVED FROM OBJECTORS

The majority of the concerns raised by local residents are addressed in the appraisal section of this report, a summary is however provided below:

- The application site forms part of a larger accessible natural greenspace (Policy COM13 (5) refers). No employment land will be lost as part of the development. The potential impacts on existing businesses are considered in detail in the appraisal section;

- The application site does provide a buffer between the existing industrial estate and housing on the north western edge of Brackla. It does however contribute little to its current allocation and resisting the application on this matter alone would be difficult to sustain at appeal;
- Opportunities for children's play and outdoor recreation will be provided on a nearby housing development. To satisfy the requirements of Policy COM11 the development will need to make a financial contribution to the equivalent value and this is considered in the appraisal section;
- No public rights of way are affected by the development;
- The Transport Assessment that accompanies the application determines that the modest volume of traffic generated by the development (18 to 21 peak hour vehicle movements) can be accommodated on the surrounding highway network, a view generally supported by the Highway Officer. Some improvements could be secured by way of planning condition;
- The planning system does not protect private rights of access;
- Observations from the Council's Pollution Control Officer in the previous section of the report deal comprehensively with the matter of noise and the consequences of the required mitigation are considered in the appraisal section;
- The impacts of local sources of dust and odour on future residents of the proposed development have been qualitatively assessed based on the location and layout of the proposed development, the proximity to the sources, the proximity of existing properties to these sources, prevailing wind conditions and complaints data provided by Bridgend County Borough Council. It is concluded that the overall dust and odour impacts of the proposed development are judged to be 'not significant'. This is a view accepted by the Council's Air Quality Officer;
- Noise and disturbance associated with the construction activities could be managed through the agreement of a method statement and controls over the timing of works. Any long term impacts from the activities associated with the occupation of the housing would be limited;
- Distances between existing and new properties are sufficient to ensure that impacts on living conditions will be limited and compliant with the Council's guidelines and policy;
- Local Authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard must be given by local planning authorities. South Wales Police's Designing Out Crime Officer is generally satisfied with the layout. Any suggestion that crime will increase simply because the application is for social housing is totally unsubstantiated and does not warrant consideration;
- The ecology report acknowledges the existence of Japanese Knotweed in the bare ground habitat on site. Prior to any works commencing a methodology for the treatment of this invasive species will need to be agreed through the imposition of a planning condition;
- Devaluation of property is not a material planning consideration.

COMMENTS ON REPRESENTATIONS RECEIVED FROM APPLICANT/AGENT

- Advice offered in response to a pre-application enquiry does not prejudice any decision the Council will make on a future application.
- It is accepted that the Association would deliver high quality housing – it is however the location of the site and the levels of mitigation that are consequently required that are of concern as outlined in the Appraisal Section.
- The decision of the Authority's Housing Strategy Team to allocate Social Housing Grant to the development is a not a material land use planning consideration.
- The recent Minister's letter encourages support for 100% affordable housing schemes but their acceptability will still be dependent on compliance with national and local policy and guidelines.
- The submissions offered by the developer and agent have been fully considered before arriving at the recommendation.
- Noise mitigation measures have been incorporated into the design of a number of housing schemes recently approved by this Council. On the advice provided by the Pollution Control Officers of the Council the mitigation required will create a poor environment for future residents which must be considered in the assessment of the application.

POLICY CONTEXT

The relevant policies relating to the proposed development from the adopted Bridgend County Borough Council Local Development Plan (LDP) (2013) are:

Strategic Policy SP2 – Design and Sustainable Place Making

Strategic Policy SP3 – Strategic Transport Planning Principles

Strategic Policy SP4 – Conservation and Enhancement of the Natural Environment

Strategic Policy SP13 – Social and Community Facilities

Strategic Policy SP14 - Infrastructure

Policy PLA4 – Climate Change and Peak Oil

Policy PLA11 – Parking Standards

Policy ENV5 – Green Infrastructure

Policy ENV6 – Nature Conservation

Policy ENV7 – Natural Resource Protection and Public Health

Policy ENV15 – Waste Management in New Development

Policy ENV17 – Renewable Energy and Low/Zero Carbon Technology

Policy COM3 – Residential Re-Use of a Building or Land

Policy COM4 – Residential Density

Policy COM5 – Affordable Housing

Policy COM8 – Provision of Health and Well-Being Facilities

Policy COM11 – Provision of Outdoor Recreation Facilities

Policy COM14 – Provision of Allotments and Community Food Networks

Supplementary Planning Guidance Notes (SPG):

SPG07: Trees and Development

SPG08: Residential Development

SPG12: Sustainable Energy

SPG13: Affordable Housing

SPG15: Community Facilities and Residential Development
SPG16: Educational Facilities and Residential Development
SPG17: Parking Standards
SPG19: Biodiversity and Development

Planning Guidance Approved for the purposes of determining planning applications:

North-East Brackla Development Brief

In the determination of a Planning application, regard should also be given to the requirements of National Planning Policy which are not duplicated within the Local Development Plan. The following Welsh Government Planning Policy is relevant to the determination of this planning application:

Planning Policy Wales 10 (PPW10)

Chapter 2: People and Places: Achieving Well-Being Through Placemaking (paras. 2.8, 2.13, 2.14)

Chapter 3: Strategic and Spatial Choices (paras. 3.21, 3.24, 3.46, 3.51)

Chapter 4: Active and Social Places (paras. 4.1.18, 4.1.26, 4.1.39, 4.1.51, 4.2.17, 4.2.25, 4.4.3)

Chapter 6: Distinctive and Natural Places (paras. 6.4.25, 6.6.25, 6.7.1, 6.7.14)

The following Technical Advice Notes (TANs) are also of relevance in the consideration of these proposals:

TAN1 – Joint Housing Land Availability Studies (2015)

TAN2 – Planning and Affordable Housing (2006)

TAN5 - Nature Conservation and Planning (2009)

TAN11 – Noise (1997)

TAN12 – Design (2016)

TAN15 – Development and Flood Risk (2004)

TAN18 – Transport (2007)

Local Development Plan Policy SP2 (Design and Sustainable Place Making) states:

All development should contribute to creating high quality, attractive, sustainable places which enhance the community in which they are located, whilst having full regard to the natural, historic and built environment by:

- 1) Complying with all relevant national policy and guidance where appropriate;*
- 2) Having a design of the highest quality possible, whilst respecting and enhancing local distinctiveness and landscape character;*
- 3) Being of an appropriate scale, size and prominence;*
- 4) Using land efficiently by:
(i) being of a density which maximises the development potential of the land whilst respecting that of the surrounding development; and
(ii) having a preference for development on previously developed land over greenfield land;*
- 5) Providing for an appropriate mix of land uses;*
- 6) Having good walking, cycling, public transport and road connections within and outside the site to ensure efficient access;*
- 7) Minimising opportunities for crime to be generated or increased;*
- 8) Avoiding or minimising noise, air, soil and water pollution;*
- 9) Incorporating methods to ensure the site is free from contamination (including invasive species);*
- 10) Safeguarding and enhancing biodiversity and green infrastructure;*

- 11) *Ensuring equality of access by all;*
- 12) *Ensuring that the viability and amenity of neighbouring uses and their users/occupiers will not be adversely affected;*
- 13) *Incorporating appropriate arrangements for the disposal of foul sewage, waste and water;*
- 14) *Make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change; and*
- 15) *Appropriately contributing towards local, physical, social and community infrastructure which is affected by the development.*

The supporting text to this Policy advises that Policy SP2 demands a high quality of design incorporating equality of access in all development proposals and seeks to ensure that new built development is sensitive to its surrounding environment.

APPRAISAL

The main considerations in the determination of this application relate to:

- the principle of residential development in this location;
- the potential implications of the development on the surrounding highway network, highway safety and whether sufficient parking facilities can/are being provided,
- The design and layout of the development and the potential impact on the living conditions and future well-being of adjacent residents, the future occupiers of the proposed housing and the continued operation of the existing businesses on the nearby industrial estate
- the impact of the scheme on the natural environment
- the drainage of the site, and
- whether contributions need to be secured through a Section 106 Legal Agreement to mitigate the impact of the development and to comply with policy.

The Principle of the Development

The site is located within the Primary Key Settlement of Bridgend as defined by Policy PLA1 (Settlement Hierarchy and Urban Management). This Policy and Policy PLA3 (Regeneration and Mixed Use Development Schemes encourage the regeneration of brownfield and under-utilised sites within settlement boundaries for an appropriate mix of land uses including residential, community and employment uses, although the site is not specifically identified. Furthermore, Policy COM3 (Residential Re-Use of a Building or Land) states that residential developments within settlement boundaries on windfall and small scale sites for ... the re-use of vacant or under-utilised land will be permitted where no other policy protects the land for an existing or alternative use.

In line with the key planning principles of Planning Policy Wales – Edition 10 (PPW) which seek to facilitate accessible and healthy environments, Policy COM13 of the Bridgend Local Development Plan (LDP) promotes the provision of accessible natural greenspace (including public open space) wherever suitable opportunities arise. In this respect the application site forms part of a larger allocation defined as Brackla Ridge and Associated Areas (Policy COM13 (5) refers). The statement submitted in support of the application suggests that the development site is of a poor standard and does not form an integral part of the Brackla Ridge which is predominantly woodland on the elevated land to the south of the site. It is claimed that the loss of the application site to a beneficial use will not adversely affect the overall character of the greenspace. Nevertheless, the development of the site for housing does not accord with Policy COM13 and the application has been advertised as a departure from the development plan.

The principle of the site being developed for housing is further supported with the applicant's agent maintaining that the site is in a sustainable location within close proximity of a range of employment, residential and community/leisure uses in the surrounding area. Furthermore, a bus stop some 350m to the east on Church Acre provides an hourly service to a range of services and facilities in Bridgend Town Centre. To further support the principle of the development, reference is made to this Council failing to provide a 5-year supply of land for housing and suggesting that the proposal should be viewed in the context of the need to identify additional housing land to address the overall housing land supply shortfall.

Paragraphs 2.8 and 2.13 of PPW10 advise that decisions must seek to promote sustainable development and support the well-being of people and communities across Wales including seeking to maximise the social, economic, environmental and cultural benefits whilst considering potential impacts when assessing proposals in line with the Act's Sustainable Development Principle. These principles support the culture change needed to embrace placemaking and ensure that planning facilitates the right development in the right place. Paragraph 3.51 of PPW10 also advises that previously developed land such as this site should, wherever possible, be used in preference to greenfield sites where it is suitable for development and in settlements such land should generally be considered suitable for appropriate development where its re-use will promote sustainability principles and any constraints can be overcome.

National policy does however recognise that not all previously developed land is suitable for development and one of the reasons quoted in Planning Policy Wales 10 is the location being unsustainable. One key component of good design is 'Movement' and 'avoiding the creation of car-based developments' to encourage more sustainable modes of travel such as Active Travel.

The site's sustainable credentials purported by the applicant's agent must be considered carefully. The Transport Statement maintains that there is a wide range of facilities that could be accessed by walking and cycling. The Brackla District Centre which includes a range of shops and services including a doctor's surgery is beyond a distance that it is likely to be accessed on foot and the connections for cyclists would be along busy sections of the road network. Schools that could accommodate children from this development are also more than 2.5km from the site. The limited number of facilities and services in the immediate vicinity will result in further travel being required but with limited connectivity (such as Active Travel routes) to Bridgend town centre, where a wider range of facilities and services exist would encourage the use of car based movement. As such the proposal deviates away from the design principles of Planning Policy Wales.

The support for residential development on underused vacant sites, inferred by Policy COM3, is conditional on the development not being in conflict with other policies of the plan. As indicated above, developing the land for housing does conflict with the policy allocation (COM13) and whilst, in terms of its appearance and function, it contributes very little to the Brackla Ridge green space designation, it is more closely related to the adjoining commercial uses and offers a buffer between the industrial estate and the existing housing to the east.

Irrespective of the site's location within the strategic settlement of Bridgend, developing this land for housing will increase the need to travel and those journeys are likely to be by car rather than by means of active travel and public transport. The Council's objective and the national placemaking outcomes of creating high quality developments that will have good walking, cycling and public transport connections will not be fully achieved by this development.

The potential implications of the development on the surrounding highway network, highway safety and whether sufficient parking facilities can/are being provided

The applicant's Transport Statement considers traffic generation and the implications of the development on the wider network in particular the effect of the development on the junction of Wyndham Close with Heol Simonston. Policy PLA8 (1) of the Bridgend Local Development Plan recognises the generally sub-standard nature of this route in terms of its width, alignment, visibility, provision of pedestrian facilities and the layout of junctions. Monies from developments in the North East Brackla Regeneration Area applications has been secured to deliver some improvements. Nevertheless, the impacts of this development must also be considered but unfortunately the submitted assessment does not include a survey of vehicle flows at the junction or approach speeds along Heol Simonston.

As such it has not been possible to fully appraise the impact and whether additional financial contribution towards further highway improvements should be sought, however, given the scale of the development, a scheme of highway improvements on the northbound approach to the junction would be beneficial in addressing vehicle speeds. Such a scheme, which could include a painted 30mph carriageway roundel, provision of a vehicle activated speed sign and verge clearance could be secured by planning condition(s).

Overall, it is the Highway Officer's view that capacity still exists within the network to accommodate the quantum of development being proposed and although construction traffic would be added to the local network, this would be for a relatively short time and could be controlled through the agreement of a construction method statement. Consideration would be given to directing traffic through the appropriate roads and junctions and this could involve limits on the use of the Wyndham Close/Heol Simonston road junction.

Serving a new housing development from an industrial estate road is far from ideal and is likely to create a poor environment for pedestrians and cyclists. Improvements could, however, be sought by setting back the site frontage and the provision of a widened footway/cycleway with a crossing point to link the site to a proposed route on the northern side of Wyndham Close. Although this provision could be secured by condition, it would significantly alter the layout and due to site levels, may require retaining works. When this was suggested to the applicant's agent this route was resisted. Without this highway improvement, the proposed access arrangements are considered unacceptable in that they do not promote the use of active travel which should be an essential component in any new development scheme.

Highway safety in terms of the layout and the car parking arrangements is considered in the next section of this report.

The design and layout of the development and the potential impact on the living conditions and future well-being of adjacent residents, the future occupiers of the proposed housing and the continued operation of the existing businesses on the nearby industrial estate

All development is required to create high quality, attractive, sustainable places and Policy SP2 of the Bridgend Local Development Plan identifies 15 criteria which is the starting point for the assessment of all applications. The Design and Access Statement that accompanies the application seeks to explain the design principles and concepts and how this reflects the site context with regard to use, layout, scale and development density. The statement suggest that the proposed layout will make the most efficient use of the site and create a high-quality living environment, with a range of housing that is similar to other nearby developments.

The design and appearance of the proposed dwellings raises no concerns with the use of brick, render and grey slate/tile being very much in keeping with existing nearby developments. The submitted designs also accord with the Welsh Government's Design Quality Requirements (DQR) with the garden space and proposed levels of privacy meeting the Council's standards. The Council's privacy standard of 21m between habitable room windows will be achieved despite the concerns offered by the residents of St Illtyd's Close and St Michael's Way. Adjustments to the layout have been undertaken to improve the internal relationship of the new dwellings in terms of privacy and domination of outlook.

Residents and the Local Member have noted that the submitted layout does not include any play/open space. The Council's 'Open Space Audit' identifies that there is currently a deficit of equipped children's play equipment and outdoor sports facilities in this location and the following amount of open space provision is required to ensure compliance with Policy COM11 – Provision of Outdoor Recreation Facilities:

- A development of 41 dwellings would lead to an estimated population of 96 (based on an average of 2.34 persons per house);
- The total amount of outdoor recreation space required should consist of approximately 1536 sq.m of Outdoor Sport provision and 528 sq.m of Children's Play Space.

The provision of open space is not addressed in the Planning Statement but in subsequent communications, attention has been drawn by the agent to the open space that is planned to be delivered by Taylor Wimpey on land to the north west of this site and the monies that will be secured by the Council to provide a Neighbourhood Equipped Area of Play (NEAP). Delays in the delivery of the open space as part of the aforementioned development has occurred partly due to the developers using the area of open space to stockpile material that came from initial ground works operations on site. Discussions with Taylor Wimpey are ongoing and an agreement for the design of the open space should be in place in the near future. When the monies are secured, under the terms of the current S106 agreement, the Council will commission the design of the NEAP and implement the scheme. No timetable for the provision is currently in place but the facility and the area of open space has the capacity to serve existing and proposed development.

Some 300m and a busy section of highway separate the application site from the proposed play/open space provision. Hafod Housing Association and Jehu have however agreed to provide a crossing point as part of this development to facilitate a safe connection for future users. Nevertheless, this development would need to make an appropriate financial contribution to ensure compliance with Policies COM11 and SP14 of the Bridgend Local Development Plan and that will be considered in the following sections of this report.

Planning Policy Wales acknowledges that an appropriate soundscape can contribute to a positive experience of place as well as being necessary for public health, amenity and well-being and the planning system has a role to play in reducing the population to noise pollution. Noise in the context of this development includes that associated with construction and occupation and the consequential impact on existing residents. Inevitably a development close to existing properties is going to result in some inconvenience from noise and general disturbance during the construction period. Whilst this is not grounds for refusing planning permission, given the scale of the development, it will be reasonable to impose planning conditions to control the hours of construction and the implementation of a traffic management plan throughout the period of construction. Given the background noise levels it is unlikely that activities associated with the completed development will have any long term impacts on existing residents.

Road traffic noise and noise from nearby industrial sites have been identified as the main sources in regard to the occupiers of the new housing. To achieve acceptable internal and external noise levels, mitigation works are proposed as part of the built development consisting of various measures but including non-standard, sealed, air tight, double glazing to all window openings. As set out in a previous section of this report, Officers in the Shared Regulatory Section have confirmed that the proposed mitigation works represent acceptable technical solutions and should ensure that the resulting noise levels will comply with the various standards. The view has however been offered that the resultant residential units will be “acoustic prisons”, sealed to the outside world behind high acoustic fences.

Land use choices and the places that are created should support healthy living and there is a concern that the level of mitigation necessary to reduce the impact of noise from road traffic and local businesses will create a poor living environment for future occupiers. Most residents value the ability to open windows at will for a variety of reasons and it is considered that designers should principally aim, through the use of good acoustic design, to achieve the internal noise level guidelines in noise sensitive rooms with windows opened. Regrettably that is not achievable as part of this development and consequently, the future residents will only receive fresh air in the habitable rooms through either an attenuated or mechanical system. The Council acknowledges that such an arrangement for a limited number of rooms in a dwelling or indeed a limited number of dwellings on a development may be acceptable and indeed this is the case for a number of properties on the Taylor Wimpey development. The situation where all habitable room windows will be sealed is difficult for the Council to support and there is justifiable concern as to whether an acceptable environment is being provided for the future residents of this development.

Planning Policy Wales has reaffirmed that the design and layout of new housing developments must give a high priority to their role as public spaces and meeting the needs of pedestrians, cyclists and public transport users. Layouts should not follow the conventional engineering led approach but rather contribute to the creation of quality places. The designer’s response to the site’s location alongside a busy industrial estate is to propose a layout that is poorly integrated with the surrounding land uses.

This housing site will be enclosed by high fencing and walls creating a sense of an isolated community which will be to the detriment of the future occupiers and the general appearance of the area. Car parking will dominate the street scene of this new estate with the quantum of spaces necessary given the site’s poor connections to local services and public transport. That stated, the requisite level of parking for the units has not been provided. Plots 6, 10, 14, 15, 35 and 36 are deficient by one space each and a further quantum of 3 visitor parking spaces over the development has not been provided and cannot be accommodated on-street without affecting adjacent driveways or turning facilities. Whilst some of the on-plot parking could be achieved by amendment of the plots it is not possible to visualise where all the parking could be provided. Such overspill on-street parking generates concerns in respect of obstructive parking, parking on footways and inappropriate parking which could affect the use of turning heads to the detriment of pedestrian and highway safety. Accordingly, an objection has been received from the Transportation Policy and Development Section.

The design and layout of the development and the potential impact on the continued operations of existing businesses on Brackla Industrial Estate

A number of objections have been received from the occupiers of units on Brackla Industrial Estate concerned that the development of new housing so close to existing businesses is likely to lead to complaints about noise and odour that will, in turn, result in restrictions being imposed on their businesses. Such a scenario is considered in Planning Policy Wales –

Edition10 (paragraphs 3.51 and 6.7.24 refers) which emphasises the importance of understanding the potential impacts of noise pollution arising from existing industrial development being critical to ensure that the effects on new development can be adequately controlled to prevent the risk of restrictions or possible closure of business premises.

A series of noise assessments have been submitted and assessed by officers in the Neighbourhood Services Section of Shared Regulatory Services. Although there are concerns regarding the required mitigation and the 'acoustic prisons' that would be created, the measures nevertheless represent a technical solution that should minimise the impact of noise from the existing industrial sources. Planning Policy Wales recognises that employment and residential uses can be compatible but requires authorities to ensure that both residential amenity and economic development opportunities are not unduly compromised (paragraph 5.4.15 refers). There remains significant concern that new residential dwellings in close proximity to unregulated B1, B2 and B8 Industrial uses would likely prejudice future commercial operations.

The impact of the scheme on the natural environment

Safeguarding and enhancing biodiversity and green infrastructure is a requirement of Policy SP2 and follows the requirement of national legislation that requires a public authority to maintain and enhance biodiversity in the exercise of functions in relation to Wales and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions. (Section 6 of the Environment (Wales) Act 2016 refers). Section 6(2) goes on to state that "In complying with subsection (1), a public authority must take account of the resilience of ecosystems, in particular

- (a) diversity between and within ecosystems;
- (b) the connections between and within ecosystems;
- (c) the scale of ecosystems;
- (d) the condition of ecosystems (including their structure and functioning); and
- (e) the adaptability of ecosystems."

Regulation 9 of the Conservation of Habitats & Species Regulations 2010 requires Local Planning Authorities to take account of the presence of European Protected Species at development sites. If they are present and affected by the development proposals, the Local Planning Authority must establish whether "the three tests" have been met, prior to determining the application. The three tests that must be satisfied are:

- (1) that the development is "in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment"
- (2) That there is "no satisfactory alternative"
- (3) That the derogation is "not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range".

Based on current evidence the majority of the development site is not unacceptably constrained by biodiversity issues as any potential impacts to protected species such as common reptiles, nesting birds and foraging bats should be readily amenable to mitigation. The development of the grassland in the south-eastern corner of the site could potentially result in an adverse biodiversity impact at a local level. The accompanying ecology report proposes a series of mitigation and compensation measures that could be secured through planning conditions/S106 obligation. The legislative and policy requirements can be addressed by the development.

The ecology report acknowledges the existence of Japanese Knotweed in the bare ground habitat on site. Prior to any works commencing a methodology for the treatment of this invasive species will need to be agreed through the imposition of a planning condition.

The drainage of the site

The submitted Drainage Strategy confirms that foul and surface water from the development will be disposed of via the existing public and private systems in Wyndham Close. Dwr Cymru Welsh Water (DCWW) initially opposed the development as the housing layout crossed the protection zone of the sewers and watermains on site. The layout has been adjusted and DCWW have withdrawn their objection. The Council's Land Drainage Team have examined the means of disposing surface water and subject to the agreement of a maintenance regime, the scheme appears technically acceptable. The discharge will be to a private system and the Land Drainage Team has offered an objection until the applicant can obtain the permission of the owner to make the connection. The developer is confident that the agreement will be in place prior to any development commencing. In these circumstances a condition requiring the agreement of the drainage works which includes the connections could be imposed to address the Land Drainage Team's objection.

Whether contributions need to be secured through a Section 106 Legal Agreement to mitigate the impact of the development and to comply with policy

Policy SP14 of the Bridgend Local Development Plan requires applications for development to include material proposals to deal with the fair and reasonable infrastructural requirements of the development and to mitigate any negative impacts that may arise. The Council does acknowledge that development costs including the costs of implementing planning agreements, may result in a scheme being unviable and in such circumstances the Council may consider the benefits of the development may outweigh the benefits of seeking to secure all infrastructural requirements. The application proposes 41 dwellings all of which will be affordable housing thereby exceeding the policy threshold of 20% which in general is broadly supported.

In accordance with SPG 16: Residential Development and Education Facilities, current school capacities in the area serving the development have been assessed and it is indicated that nursery and primary provision is currently oversubscribed (Coety Primary School). Space however exists within the catchment Secondary School. Based on the number and mix of housing, a contribution of £114,191 would be required from the development to meet the 1 Nursery and 6 Primary School places that the housing scheme would demand.

The Council's 'Open Space Audit' identifies a deficit of equipped children's play equipment and outdoor sports facilities in the location of the development. Open space and a Neighbourhood Equipped Area that will be delivered as part of the Taylor Wimpey development will make a significant contribution and it is intended that residents of the affordable housing will be able to access this facility when completed via improved crossing and footpath/cycleway links. Development costs associated with the delivery of affordable housing has limited the level of contribution with the sum of £75,000 being offered towards the provision of open space and education facilities. The equivalent value of the outdoor sport and children play provision required under Policy COM11 would be £42,599.

The Council acknowledges that requiring multiple obligations can seriously undermine the delivery of development and prioritisation of need is part of the planning assessment. Part of that process must also require the submission of evidence by the developer to justify that such contributions would compromise development viability. If the contribution towards Policy COM11 were set aside it would still result in a significant shortfall in the Education contribution which could increase the burden on the Council to deliver the school places from existing constrained budgets. On the basis of the evidence currently submitted, the application does not fully address the requirements of Policy SP14 of the LDP.

CONCLUSION

The primary objective of Planning Policy Wales is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation. It is the role of the planning authority to exercise its judgement and consider many and often conflicting issues to decide whether a development scheme is acceptable. The process of 'weighing up' the relevant factors often described as the 'planning balance' has been challenging in respect of this particular development due to its specific characterisations. In deciding whether to approve or refuse a planning application, the policies of the adopted Bridgend Local Development Plan (LDP) (2013) are the starting point. The broad support for the development of underused brownfield sites for housing has been part of the plan strategy at a national and local level. Such support is not unqualified and Policy SP2 of the LDP demands a high quality of design for all development and represents the starting point for all planning applications.

The publication of Planning Policy Wales 10 in December 2018 confirmed that placemaking in both plan making and development management decisions would be the means of achieving sustainable places that are attractive, sociable, accessible, active, secure, welcoming and friendly (paragraph 2.3 of PPW10 refers). Underutilised sites within existing settlements should be considered in the first instance but it is recognised that not all sites of this nature are suitable for all types of development. Distances between the application site and the nearest shops, schools and health facilities and the lack of good footpath/cycleway connection will increase the need to travel for future residents and for those journeys, either to be by car or along substandard footways. If car ownership levels are also to be lower, as suggested in the Transport Statement, residents will be further disadvantaged. Reference to the North East Brackla Development Brief and the planned district centre have been made by the developer's agent but there are currently no firm proposals before the Council for such a facility or indeed to provide the necessary connecting footway/cycleway links.

In support of the development, reference has been made to the Council failing to provide a 5 year housing supply and the acute need to deliver affordable housing schemes in the County Borough. Although a material consideration, Members will be aware that work is well under way on the preparation of the new Local Development Plan which will consider further the supply of housing land. Indeed the Local Market Assessment 2019/20 report for the Council will be presented to Members, which demonstrates that the review is being progressed. In a 2017 letter, the Cabinet Secretary for Environment and Rural Affairs acknowledged that speculative applications will be made to Councils where a five year housing land supply is not demonstrated. Such applications should still be assessed against relevant planning policy considerations, including the need to increase housing land supply and the principles of sustainable development. The letter states that the principles of sustainable development and the creation of cohesive communities, which forms the basis of the Welsh Government's planning policy, remains and should not be undermined by the need to increase housing land supply.

The current shortfall in the delivery of affordable housing at a national level is a significant consideration that has not been underestimated in the assessment of this application. Hafod Housing Association and their partners are committed to deliver a high quality, 100% affordable housing development on this site that would utilise Social Housing Grant that has been provisionally allocated to the project by the Council's Housing Strategy Team. The Council's response to the Minister for Housing and Local Government's recent letter will be to review affordable housing delivery as part of the new development plan. The letter does remind Councils that developments should not be on sites that are *inferior in any way to sites which are being promoted for market housing*. In this case, it is considered that the site is

unsuitable for residential development for the reasons outlined above and as such the need to provide affordable housing does not outweigh the physical constraints of the proposal.

Questions about the viability of the development in terms of the levels of contributions towards public open space and education further undermines the acceptability of the development on a matter of principle. Although negotiations have not taken place on this matter and potentially, evidence could be offered to support the proposed levels of obligation that information is not currently before the Council. The scheme therefore does not accord fully with Policy SP14 of the Bridgend Local Development Plan

Developing this land for housing would not constitute the 'right development in the right place'. The sustainable place making objectives of the local development plan (Policy SP2 refers) and national sustainable placemaking outcomes would not be achieved so from the Council's perspective, the principle of developing the land for housing is resisted. The justification for a development that conflicts with the site's allocation as accessible natural greenspace has therefore not been made. This represents a change to the view expressed at the pre-application advice stage and has not been made lightly but comes from the placemaking agenda that is firmly established in Planning Policy Wales Edition 10 which was published after pre-application advice was offered.

On matters of detail, the scheme also fails in certain areas which has reinforced the view that the principle of the development is unacceptable. The site is so closely related to noise sources both from road traffic and nearby businesses that the level of mitigation required would create living spaces that could not offer an acceptable environment for the future residents. The applicant's agent draws attention to similar sound proofing measures that have been used on nearby housing developments and in planning terms, under the appropriate circumstances, it is acceptable to do so to enable development. The scale of mitigation here requires all habitable room windows in the front and rear elevations of the dwellings to be sealed and that would create a 'prison' environment that should not be supported. Furthermore, there remains the possibility that even with mitigation in place, noise from road traffic and in particular local businesses that can operate 24 hours a day without any current planning constraint, could lead to complaints that could result in business activities, on land allocated and safeguarded for such uses being repeatedly affected.

Many aspects of the submitted layout are acceptable and there is little doubt that the high quality housing in terms of the form and appearance would be delivered. Deficiencies in car parking numbers and the failure to incorporate footway/cycleway improvements along the site frontage are more minor concerns but reaffirm the scheme's failure to comply fully with policies of the Bridgend Local Development Plan.

The importance of providing much needed affordable housing and the potential for the development to deliver high quality homes for members of the community carries significant weight, however, unfortunately the site's location so distant from facilities and services and too close to existing noise sources and the consequential impacts considered above offset any positive benefits having particular regard to national and local planning policy. Accordingly, the application is recommended for refusal.

In reaching this conclusion, the requirements of sections 3 and 5 of the Well Being of Future Generations (Wales) Act 2015 have been considered. The proposed development does not fully accord with the Act's sustainable development principles and will not satisfactorily contribute to the well-being objectives of supporting cohesive, healthier and resilient communities.

RECOMMENDATION

(R30) That permission be REFUSED for the following reason(s):-

1. The proposed development, by reason of its distance from existing facilities and services and the lack of acceptable walking, cycling and public transport connections will result in future residents being car dependent which is contrary to Policy SP2 (6 and 14) of the Bridgend Local Development Plan 2013, the national sustainable placemaking outcome of facilitating accessible and healthy environments as referred to in Planning Policy Wales – Edition 10 – December 2018 and the sustainable development principles and well-being goals of the Well-being of Future Generations (Wales) Act 2015.
2. The level of noise mitigation required by reason of the site's close proximity to a road and existing industrial uses, will result in poor levels of amenity and well-being to the future occupiers contrary to the objective of Policy SP2 (12) of the Bridgend Local Development Plan 2013, the national sustainable placemaking outcome of creating a healthy environment as referred to in Planning Policy Wales – Edition 10 – December 2018 and the well-being goals of the Well-being of Future Generations (Wales) Act 2015.
3. The design and layout of the proposed development does not incorporate a footway/cycleway link along the site frontage and does not maximise accessibility by walking, cycling and public transport and is therefore contrary to Policy SP2 (6) of the Bridgend Local Development Plan 2013, the Sustainable Transport Hierarchy of Planning required by Planning Policy Wales – Edition 10 – December 2018 and the sustainable development principles and well-being goals of the Well-being of Future Generations (Wales) Act 2015.
4. In the absence of adequate off-street parking for Plots 6, 10, 14, 15, 35 and 36, the submitted layout will generate on-street parking which will dominate the street scene and will affect the safe movement of pedestrians and highway users in conflict with Policies SP2 (11 and 12), PLA11, the Council's Car Parking Guidelines and Paragraphs 4.1.51 and 4.1.52 of Planning Policy Wales – Edition 10 – December 2018.

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Background papers

None