REFERENCE: P/21/988/FUL

APPLICANT: Mr J Barber 2 Gregory Close, Pencoed CF35 6RF

LOCATION: Unit 1a & 2a, Heol Ffaldau,

Brackla Industrial Estate, Bridgend CF31 2AJ

PROPOSAL: Change of use from Use Class B1/B2 to Use Class D1 (Health

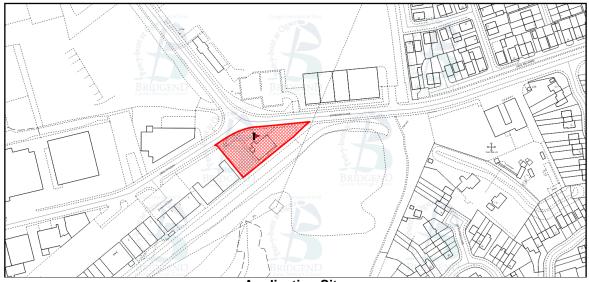
Clinic)

RECEIVED: 27 October 2021

SITE INSPECTED: 18 November 2021

DESCRIPTION OF PROPOSED DEVELOPMENT & SITE DESCRIPTION

This application seeks full planning permission for the change of use of Units 1 and 2 Heol Ffaldau, Brackla Industrial Estate, Bridgend from Use Class B1/B2 (Business/General Industrial) to Use Class D1 (Non-residential Institutions), as defined by the Town and Country Planning (Use Classes) Order 1987.

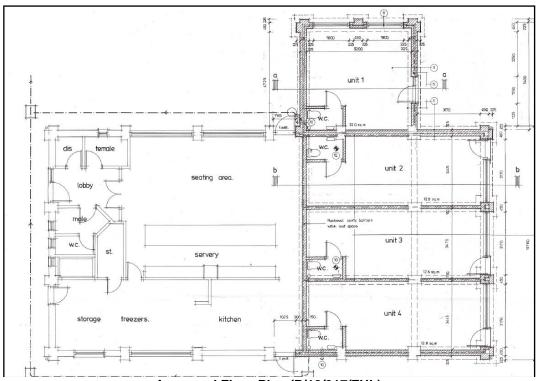


Application Site

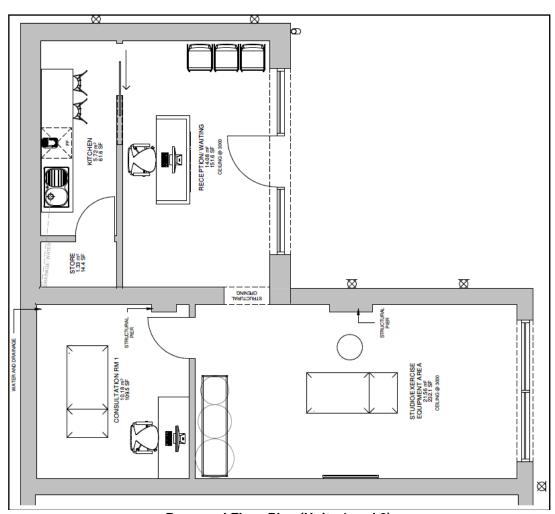
Planning permission for the redevelopment of the wider triangular-shaped site known locally as Caitlyn's Kitchen was granted on 6 November 2020 under Planning permission reference P/18/317/FUL. The consent comprised the following:

- An extension to the existing building to add B1 and B2 use starter units with parking area (two of which are the subject of this Planning application)
- The subdivision of the existing A3 use to form two A3 units
- The erection of two new starter units for B1, B2 and B8 use with parking provision
- The realignment of the highway adjacent to the northern boundary of the site for the introduction of traffic calming measures

The development now under consideration comprises the change of use of two of the B1/B2 starter units (approved under Planning permission reference P/18/317/FUL) located within an extension to the existing building in the north eastern area of the application site, as shown below:



Approved Floor Plan (P/18/317/FUL)



Proposed Floor Plan (Units 1 and 2)

The proposal comprises the change of use of Units 1 and 2 (approved under P/18/317/FUL) to a chiropractor's practice to operate between the hours of 7:30am and 7:30pm Monday to Friday. The practice will employ one practitioner and two part-time

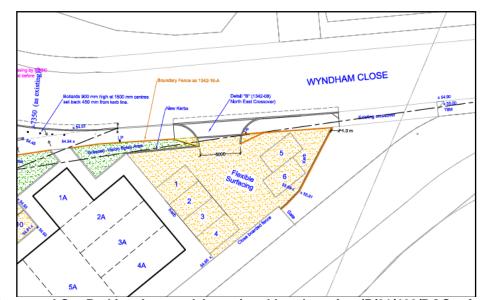
receptionists and will comprise a reception/waiting room, kitchen and storeroom, consultation room and studio/exercise area.

No external alterations are proposed as part of this Planning application.

SITE DESCRIPTION

The application site is located within the Primary Key Settlement of Bridgend, as defined by Bridgend County Borough Council's adopted Local Development Plan (2013) and forms a part of a wider development side which occupies a triangular-shaped corner plot between Heol Ffaldau and Wyndham Close. The proposed change of use relates to two units in the north-eastern area of the application site.

The wider site is accessed principally from a vehicular access point on the north-western boundary adjacent to Heol Ffaldau. Units 1 and 2 which are the subject of this application are accessed via a secondary access point on the north-eastern boundary off Wyndham Close, from the car parking area to the north-east of the building where six off-street parking spaces and associated landscaping is to be provided, as shown below:



Approved Car Parking Area and Associated Landscaping (P/21/403/DOC refers)

The site is also situated within Brackla Industrial Estate which is allocated and protected for employment development falling within B1, B2 and B8 Use Classes by Policy REG1(18) of the adopted Local Development Plan (2013).

The area can be characterised as industrial with buildings of a mostly industrial-style finish of relatively large scale, operating within a mix of use classes predominantly B1, B2 and B8.

RELEVANT HISTORY

RELEVANTINISTORT			
Application Reference	Description	Decision	Date
P/08/432/FUL	Erect two new ducts, one for Chinese cooker, other for fish and chips	Unconditional Consent	20/06/2008
P/08/388/FUL	New entrance door, build disabled toilet and small room, change side door entrance	Conditional Consent	14/08/2008

P/17/327/FUL Redevelopment at Caitlyn's Kitchen: Withdrawn 18/08/2017 Phase 1 = Alterations & extensions to existing building Phase 2 = 3 starter units P/18/317/FUL Extension to existing building to add Conditional 06/11/2020 B1 and B2 starter units; subdivision of Consent existing A3 use to form 2 A3 units; new car parking; creation of new access point and realignment of highway for traffic calming P/20/740/FUL Change of use from B1/B2 to D1 Withdrawn 14/01/2021 (health clinic) P/20/984/DOC Approval of details for condition 2 Split Decision 17/03/2021 (materials), condition 5 (drainage), condition 6 (road alignment), condition 9 (parking scheme) and condition 13 (traffic and delivery plan) of P/18/317/FUL P/21/403/DOC Approval of details for conditions 6, 9 Agreed 03/09/2021

CONSULTATION RESPONSES

CONSULTEE COMMENTS
Highways Officer Objection.
9 March 2022

Shared Regulatory

Services

No objection to the introduction of a D1 Use Class in this location.

and 13 of P/18/317/FUL

Public Protection:

Noise

11 February 2022

REPRESENTATIONS RECEIVED

The application has been advertised on site and five of the nearest industrial units have been directly notified. The period allowed for response to consultations/publicity expired on 18 February 2022.

Two objections have been received from the owner/occupiers of Spar Plas Windows, (Unit 28 Heol Ffaldau) and 57 Tyres Limited (Units 2 & 3 Heol Ffaldau). The concerns raised are referred to below:

There is inadequate parking at the application site to accommodate staff and visiting patients thereby forcing parking to the street to the detriment of neighbouring business and safety. The introduction of a business with high turn-over of patients will add to the congestion experienced in the area and be problematic for users of neighbouring businesses.

Cllr A Williams is supportive of the application and wrote in an initial consultation

response dated 11 November 2021 that she welcomes investment into the Industrial Estate.

COMMENTS ON REPRESENTATIONS RECEIVED

Factors to be taken into account in making Planning decisions must be Planning matters, that is, they must be relevant to the proposed development and use of land in the public interest. The matters raised which relate to highway safety are addressed in the appraisal section below.

RELEVANT POLICIES

Local Policies

The Bridgend Local Development Plan 2006-2021 (LDP) was formally adopted by the Council in September 2013, within which the following policies and Supplementary Planning Guidance are relevant:

Policy PLA1 Settlement Hierarchy and Urban Management

Policy PLA3 Regeneration and Mixed Use Development Schemes

Policy SP2 Design and Sustainable Place Making Policy SP3 Strategic Transport Planning Principles

Policy PLA11 Parking StandardsPolicy REG1 Employment Sites

Policy REG2 Protection of Identified Employment Sites

Supplementary Planning Guidance 17 Parking Standards

Supplementary Planning Guidance 21 Safeguarding Employment Sites

National Policies

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

Future Wales – the National Plan 2040

Planning Policy Wales Edition 11

Planning Policy Wales TAN 12 Design Planning Policy Wales TAN 18 Transport

Planning Policy Wales TAN 23 Economic Development

WELL-BEING OF FUTURE GENERATIONS (WALES) ACT 2015

The Well-being of Future Generations Act 2015 imposes a duty on public bodies to carry out sustainable development in accordance with sustainable development principles to act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs (Section 5).

The well-being goals identified in the act are:

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsible Wales

The duty has been considered in the assessment of this application. It is considered that there would be no significant or unacceptable impacts upon the achievement of well-being goals/objectives as a result of the proposed development.

THE SOCIO ECONOMIC DUTY

The Socio Economic Duty (under Part 1, Section 1 of the Equality Act 2010) which came in to force on 31 March 2021, has the overall aim of delivering better outcomes for those who experience socio-economic disadvantage and whilst this is not a strategic decision, the duty has been considered in the assessment of this application.

APPRAISAL

This application is referred to the Development Control Committee at the request of Councillor A Williams who is supportive of the scheme.

PRINCIPLE OF DEVELOPMENT

The proposed development seeks a change of use of Units 1 and 2 Heol Ffaldau (Caitlyn's Kitchen), Brackla Industrial Estate to a chiropractic clinic operating within a D1 Use Class (Non-residential Institutions), as defined by the Town and Country Planning (Use Classes) Order 1987.

The Planning system manages the development and use of land in the public interest contributing to improving the economic, social, environmental and cultural well-being of Wales as required by the Well-being of Future Generations (Wales) Act 2015 and as stated in paragraph 1.2 of Planning Policy Wales (Edition 11, February 2021) (PPW11).

The application site is located within Brackla Industrial Estate which is allocated and protected for employment development falling within B1, B2 and B8 Use Classes by Policy REG1(18) of the adopted Local Development Plan (2013). As the proposed development comprises the change of use to a chiropractic clinic operating within a D1 Use Class, the application is not deemed to be compliant with Policy REG1(18) of the Local Development Plan (2013).

The adopted Local Development Plan (2013) seeks to focus development in four strategic regeneration growth areas with the objective of delivering more sustainable patterns of development. In order to meet the varying requirements of business and to provide access to employment and training for all residents of the County Borough, a range and choice of vacant sites on 120 hectares of land are identified and protected for employment (B1, B2 and B8 uses) purposes. This is inclusive of Brackla Industrial Estate which is allocated and protected for employment development falling within B1, B2 and B8 Use Classes by Policy REG1(18) of the adopted Local Development Plan (2013). Development proposals which seek to change the use of existing employment building to uses within Class D1 are assessed against Policy REG2 of the Local Development Plan (2013).

Policy REG2 states that proposals which result in the loss of existing or proposed employment (B1, B2 and B8) land or buildings on sites identified in Policy REG1 will not be permitted. Exceptions will need to be justified on one of the following grounds:

- In appropriate locations, a limited number of those uses regarded as complementary and/or ancillary to the main use of the land for industrial purposes; or
- 2. In appropriate locations, those sui generis employment uses which are suitably located on employment land.

Paragraph 3.3 of Supplementary Planning Guidance 21: Safeguarding Employment Sites (SPG21) states that there are a limited number of non B1, B2 and B8 uses which could be considered as acceptable on employment sites as they would provide a service to employees and their clients and contribute to the efficiency of the employment site.

Such acceptable uses are identified within SPG21 as being hotels with conference facilities, banks, post offices, public houses, cafes, newsagents, bakeries, gyms and crèches.

Notwithstanding the above, the provision of a chiropractor's clinic in this location is not considered to contribute to the efficiency of the Industrial Estate nor is it considered to be an exceptional form of development which will protect the site for employment uses falling within B1, B2 and B8 Use Classes.

Furthermore, Planning Policy Wales (Edition 11, February 20221) (PPW11) prescribes a 'town centre first' policy in relation to the location of new retail and other complementary uses. Paragraph 4.3.19 states that 'developers should demonstrate that all potential retail and commercial options, and then edge-of-centre options, have been thoroughly assessed using the sequential approach before out-of-centre sites are considered'.

Notwithstanding the strict controls generally applied to uses within the allocated employment sites, the Council is conscious that there is significant interest and pressure to allow D1 uses to operate within these areas.

In support of this application the Planning agent has provided a Planning Justification document which provides further explanation of the development proposal and reasoning for its acceptability. In support of this statement a total of eight letters of support from neighbouring units have also been submitted, the addresses of which are below:

- VMDUK Limited, Units 5 & 6 Heol Ffaldau, Brackla Industrial Estate
- Peyton Property, Main Avenue, Brackla Industrial Estate
- Peyton Travel Ltd, Main Avenue, Brackla Industrial Estate
- Templegate Electrical Supplies Limited, Unit 7 Coegnant Close, Brackla Industrial Estate
- Howel Richards Transport Ltd, Heol Ffaldau, Brackla Industrial Estate
- QE Paving Hard Landscaping Contractors, Heol Ffaldau, Brackla Industrial Estate
- JAB 23, Heol Ffaldau, Brackla Industrial Estate
- Centregreat Ltd. Units 11-12 Wyndham Close, Brackla Industrial Estate

The Planning Justification document states:

In terms of meeting the stated policy criteria set out in the LDP and SPG 21 it is contended that a chiropractor practice could just as much be viewed as providing a service to employees and their clients and contribute to the efficiency of the employment site as do the gyms and physiotherapy uses that BCBC have allowed on the same and other Industrial Estates.

For example, in the same way that we presume gyms/physios are allowed due to their health and wellbeing credentials and to ensure the fitness and wholeness of local communities – the same characteristics can be ascribed to a chiropractic.

Such a service would provide the following benefits to those working on the estate and in nearby growing residential areas, namely:

- Less sick days lost due to effective treatment of common skeletal concerns like neck, back and leg issues involved in manual labour leading to greater efficiency and productivity; and
- Improved health and mental wellbeing leading to a more motivated and productive workforce benefiting local businesses on the Estates and in other locations of the town.

The benefits of locating on the Estate are that it would be convenient for those working on the Estate or nearby to have early morning, lunch time or evening appointments.

The Planning agent argues that a strong case can be made for the fact that the use of the two starter units would have no negative on the wider economic functioning of Brackla Industrial Estate than the B1/B2 units approved under Planning permission reference P/18/317/FUL. It is argued that it could not be sustainably argued that the change of use of 54.7 square metres of floorspace to a D1 Use would harm the economic potential or threaten/damage the thrust of the LDP policies in relation to regeneration and growth.

In support of this argument a list of non-B uses currently operating within Brackla Industrial Estate and the wider Borough has been produced. The list references other non-B uses including a chiropractor in Bridgend Industrial Estate, a children's day nursery in Litchard Industrial Estate and a gym on Brackla Industrial Estate to name a few.

Exceptions to the traditional B1, B2 and B8 uses on the allocated industrial sites can be considered where they are complementary or ancillary to the main industrial uses or where a sui generis use is suitably located on employment land. The reference to other businesses within Brackla Industrial Estate and other allocated Employment Sites within the County Borough operating outside of the traditional B1, B2 and B8 uses is noted, however, public houses, cafes, gyms and crèches are uses which are identified within SPG21 as being uses which contribute to the efficiency of the employment site as a whole and are therefore considered to be acceptable additions.

The uses are considered acceptable as they provide a service to which employees/patrons of the employment area can use on a regular basis within linked trips to and from their place of work/business. A chiropractor practice is considered to be a niche use that is unlikely to offer a service to employees of the employment area on a regular basis when compared to a gym/creche. As such, a chiropractor practice in this instance is not regarded as complementary or ancillary to the main use of the land for industrial purposes.

In addition, each application is considered on its own merits and the provision of other D1 and D2 Use Classes within Brackla Industrial Estate or on other allocated sites does not set a precedent for the approval of this Planning application.

In addition, it is argued that the site has been vacant since works were completed and has been actively marketed since January 2020 with little to no take-up from B1/B2 Use Class operators. This statement is supported by an email from Watts and Morgan Estate & Letting Agents who state that *the property has been fully and proactively*

marketed since January 2020. Referring to the wider site (P/18/317/FUL refers) 4 out of the 8 units are under offer with 4 units still vacant after 2 years of operating. The email states the following:

We have carried out in excess of 30 viewings at the property and aside from the two A3 units that let very quickly, we have struggled to attract B1/B2 occupiers. The vast majority of enquiries have come from applicants looking at a range of uses including D1, D2 and A1 uses.

The information submitted which references the marketing of the site and vacancy rates within Employment Sites within the County Borough does not provide sufficient justification to allow for alternative non-B uses unless the proposal satisfies either Policy REG2 or REG3 of the LDP.

The Council therefore maintains that the introduction of a D1 Use in this location, more specifically a chiropractic practice, is not complementary nor ancillary to the use of the site as an Industrial Estate. Therefore, whilst the comments within the Planning Justification document and support from the local member are noted, the provision of a chiropractic practice is not considered to contribute to the efficiency of the Industrial Estate nor is it considered to be an exceptional form of development which will help to protect the site for employment uses within B1, B2 and B8 Use Classes and it is not considered to be acceptable to the Local Planning Authority.

As the proposed development comprises the change of use of a new build unit to a chiropractic clinic which operates within a D1 Use Class, the application is not compliant with Policy REG1(18) of the Local Development Plan (2013). In consideration of the proposal it is considered that on balance the proposed development does not comply with Policy REG2 of the Local Development Plan (2013) and is therefore contrary to the provisions and aims of the Plan. It is out of accord with the Local Development Plan (2013) and considered to be unacceptable from a policy perspective.

DESIGN/IMPACT ON THE CHARACTER AND APPEARANCE OF THE AREA

The proposed change of use will not impact the character or appearance of the existing building or wider area as no external alterations are proposed as part of this development. As such, the design of the proposal is not considered to be relevant in this instance.

NEIGHBOURING/RESIDENTIAL AMENITY: NOISE

The proposal will not impact the existing levels of amenity afforded to the wider area given its location within Brackla Industrial Estate and therefore the proposal is considered to be acceptable from an amenity perspective.

HIGHWAY SAFETY AND PARKING PROVISION

Policy PLA11 of the Local Development Plan 2013 stipulates that all development will be required to provide appropriate levels of parking in accordance with the adopted parking standards.

Whilst dealing with the previous Planning application for the redevelopment of the whole site known as Caitlyn's Kitchen (P/18/317/FUL refers), the developer was required to enter into a Section 106 Agreement to fund a legal Traffic Order and complete physical works to introduce waiting restrictions at the modified junction due to concerns raised by the Highway Authority.

During the processing of the application the Highway Authority raised concern which related to the existing junction fronting the site between Heol Ffaldau and Wyndham Close as it is excessively wide and suffers from vehicles using excessive speeds. Given that the use of the existing site access was proposed to be intensified within close proximity to the junction, it was considered necessary to require a scheme for the junction to be realigned and modified to reduce the opportunity for vehicles to use excessive speeds and improve highway safety.

To ensure the junction realignment is undertaken to reduce excessive speeds at the junction, it was considered necessary to approve Planning permission reference P/18/317/FUL subject to the agreement made under Section 106 of the Town and Country Planning Act (as amended) which would ensure that the junction improvement works are undertaken.

In addition, the following highway conditions were imposed upon the consent:

Condition 6

Within three months of the date of consent, a scheme for the provision of a realignment of the Wyndham Close/Heol Ffaldau junction shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include a Stage 2 Safety Audit. The approved scheme shall be implemented prior to the development being brought into beneficial use.

Reason: In the interests of highway safety.

Condition 7

The proposed widened means of access shall be laid out with 3.0 metre radius kerbing on both sides of the entrance constructed and retained in permanent materials with vision splays of 2.4m x 43m in both directions before the development is brought into beneficial use and retained as such thereafter in perpetuity.

Reason: In the interests of highway safety.

Condition 8

The proposed means of access to the northern parking area shall be laid out at 5m wide with 3.0 metre radius kerbing on both sides of the entrance constructed and retained in permanent materials with vision slays of 2.4m x 43m in both directions before the development is brought into beneficial use and retained as such thereafter in perpetuity.

Reason: In the interests of highway safety.

Condition 9

Within three months of the date of consent, a revised scheme for the north eastern parking area to provide 6 off-street parking spaces shall be submitted to and agreed in writing by the Local Planning Authority. The parking area shall be completed in permanent materials with the individual spaces clearly demarcated in permanent materials in accordance with the approved layout prior to the development being brought into beneficial use and shall be retained for parking purposes in perpetuity.

Reason: In the interests of highway safety.

Condition 10

The south western parking area shall be completed in permanent materials with the individual spaces clearly demarcated in permanent materials in accordance with the

approved layout prior to the development being brought into beneficial use and shall be retained for parking purposes in perpetuity.

Reason: In the interests of highway safety.

Condition 11

The delivery vehicle turning area shall be completed and clearly demarcated in permanent materials in accordance with the approved layout prior to the development being brought into beneficial use and shall be retained for vehicle turning purposes in perpetuity.

Reason: In the interests of highway safety.

Condition 12

No structure, erection or planting exceeding 0.9 metres in height above adjacent carriageway level shall be places within the required vision splay areas at any time.

Reason: In the interests of highway safety.

Condition 13

Within three months of the date of consent. a Traffic & Delivery Plan shall be submitted to and agreed in writing by the Local Planning Authority. All servicing and delivery vehicle movements to the units shall be made in accordance with the approved Traffic & Delivery Plan once the development is brought into beneficial use and retained thereafter in perpetuity.

Reason: In the interests of highway safety.

To satisfy the conditions imposed upon P/18/317/FUL, two Discharge of Condition Applications have been submitted to the Authority. The schemes submitted for the provision of a realignment of the Wyndham Close/Heol Ffaldau junction, including a Stage 2 Safety Audit (Condition 6), and for the north-eastern parking area to provide six off-street car parking spaces (Condition 9) was approved on 3 September 2021 under Planning reference P/21/403/DOC. The Traffic and Delivery Plan required under Condition 13 was also approved under P/21/403/DOC on 3 September 2021.

Despite the schemes being considered acceptable to the Authority, it should be noted that the works that were required to be undertaken prior to the beneficial use of the have not been carried out. Therefore, and in the event that this application was to be determined favourably, such conditions would need to be re-imposed (potentially with amended wording to take account of details approved under the DOC applications) and the works would be required to be implemented prior to the beneficial occupation of the units proposed to operate as a chiropractic clinic.

In dealing with the previous planning application which proposed the redevelopment of the wider Caitlyn's Kitchen site (P/18/317/FUL refers), the Highway Authority considered that a total of six off-street car parking spaces would need to be provided for the north-eastern car parking area, to be completed in permanent materials with the individual spaces clearly demarcated. This is the car parking area which will mostly likely serve the proposed chiropractors.

The two units which are the subject of this application (Units 1 and 2) were considered to generate a parking requirement for 2 spaces as offices (B1/B2 Use Class) which was included within the overall parking provision for the wider site.

The site lies within Zone 5, as identified in Volume 2 of Supplementary Planning Guidance Note 17: Parking Standards (SPG17). The change of use to a health facility (D1 Use Class) such as this would generate a requirement of 1 space per practitioner (operational) and 1 space per 2 ancillary staff and 3 spaces per practitioner (nonoperational). See table above:

Health Centres & Surgeries

1 space per practitioner (See Note 2)

1 space per 3 ancillary staff (1 space per 2 in **Zones 5 & 6**) & 3 spaces per practitioner

Note 2 reads:

2. Practitioner to include doctor, dentist, nurse, health visitor etc.

Having reviewed the floor plans submitted, it is considered that the development proposed would generate a total requirement for five off-street car parking spaces. Being pragmatic, this could be reduced to 4 spaces (given a longer appointment time for such treatment) and the unlikely overlap in patients. This would require a condition limiting the use to a chiropractor in the event that the application was successful.

Unfortunately, the site is constrained and it is not possible to create an additional two spaces to support the proposal and prevent overspill parking onto the highway in close proximity to a bend and junction to the detriment of highway safety.

Accordingly, it is considered that the proposed development would generate on-street parking in close proximity to a band and junction to the detriment of highway safety and an objection is raised by the Highway Authority.

CONCLUSION

Having regard to the above and in consideration of the objections raised (and the letters of support), it is considered that, on balance, the proposed development is not acceptable in land use planning terms and the application is recommended for refusal.

The Policies of the adopted Local Development Plan (2013) identify and protect land for employment use in order to meet the varying requirements of business and to provide access to employment for all residents. Exceptions to the traditional B1, B2 and B8 uses on the allocated industrial sites can, however, be considered where they are complementary or ancillary to the main industrial uses or where a sui generis use is suitably located on employment land.

In assessing this application against the aforementioned policies, it is considered that the chiropractic clinic operating within a D1 Use Class is neither complementary nor ancillary to the wider Industrial Estate. Furthermore, the proposal does not fully accord with the criteria of Policy REG2 as it will not contribute to the efficiency of the wider industrial estate and is best located within an existing town or local centre which is accessible by a range of transport modes. In consideration of the scheme, it is contrary to Policy and does not comply with the provisions of the Local Development Plan (2013).

In addition, an objection is raised by the Highway Authority as sufficient off-street car parking cannot be provided which will result in overspill on-street parking in close proximity to a bend and junction to the detriment of highway safety and contrary to the provisions of Policy PLA11 of the Local Development Plan (2013).

For the reasons outlined above the proposal is considered to conflict with Policies SP2, SP3, REG1, REG2 and PLA11 of the Local Development Plan (2013) and is therefore recommended for refusal.

RECOMMENDATION

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

- 1. The use of Units 1 and 2 as a chiropractic clinic falling within Class D1 of the Schedule to the Town and Country Planning (Use Classes) Order 1987 conflicts with Policy REG1 (18) which allocates and protects the land for employment purposes (Classes B1, B2 and B8 of the Schedule to the Town and Country Planning (Use Classes) Order 1987) in that the use is not considered to be complementary to nor ancillary to the industrial uses on Brackla Industrial Estate. Therefore, the proposal does not comply with Policies SP2 and REG2 of the Local Development Plan (2013), Supplementary Planning Guidance 21: Safeguarding Employment Sites and guidance contained within Planning Policy Wales (Edition 11, February 2021).
- 2. The proposed development fails to provide sufficient on-site parking to serve the D1 use and would generate on-street parking in close proximity to a bend and junction to the detriment of highway safety, out of accord with Policy PLA11 of the Local Development Plan (2013), guidance contained within Supplementary Planning Guidance 17: Parking Standards and guidance contained within Planning Policy Wales (Edition 11, February 2021).
- 3. The proposed use would also be sited within a relatively unsustainable location that is not accessible by a range of transport modes such as walking, cycling and public transport leading to an excessive reliance on the private car, out of accord with Policy SP2 of the Local Development Plan (2013) and guidance contained within Planning Policy Wales (Edition 11, February 2021).

JANINE NIGHTINGALE
CORPORATE DIRECTOR COMMUNITIES

Background PapersNone