

RECOMMENDATION : GRANT WITH CONDITIONS

REFERENCE: P/15/60/FUL

APPLICANT: COASTAL HOUSING GROUP & BCBC
3RD FLOOR 220 HIGH STREET SWANSEA

LOCATION: LAND AT THE RHIW MULTI STOREY CAR PARK WALKWAY BRIDGE & ENTRANCE BRIDGEND

PROPOSAL: DEMOLISH & REBUILD CAR PARK: ERECT 5 STOREY RESIDENTIAL/COMMERCIAL BLOCK (CLASS A1/A2/A3 & 28 DWELLINGS WITH PARKING)

RECEIVED: 30th January 2015

SITE INSPECTED: 27th February 2015

APPLICATION/SITE DESCRIPTION

Coastal Housing Group and Bridgend County Borough Council are seeking full planning permission for the demolition of the existing multi-storey car park and pedestrian walkway bridge and provision of a mixed used redevelopment of the site comprising a replacement multi storey car park, a 5 storey residential/commercial block comprising ground floor retail space (Classes A1 or A2 or A3) with 28 residential apartments above and undercroft residential car parking area and associated works. The development forms part of the Vibrant and Viable Place flagship project with funding from Welsh Government.

The application has been accompanied by the following information:

Planning & Design and Access Statement prepared by Asbri Planning;

Ecological Appraisal prepared by Soltys Brewster Ecology;

Environmental Noise Assessment prepared by Acoustic Consultants Ltd;

Tree Survey, Categorisation & Constraints Report prepared by Steve Ambler and Sons;

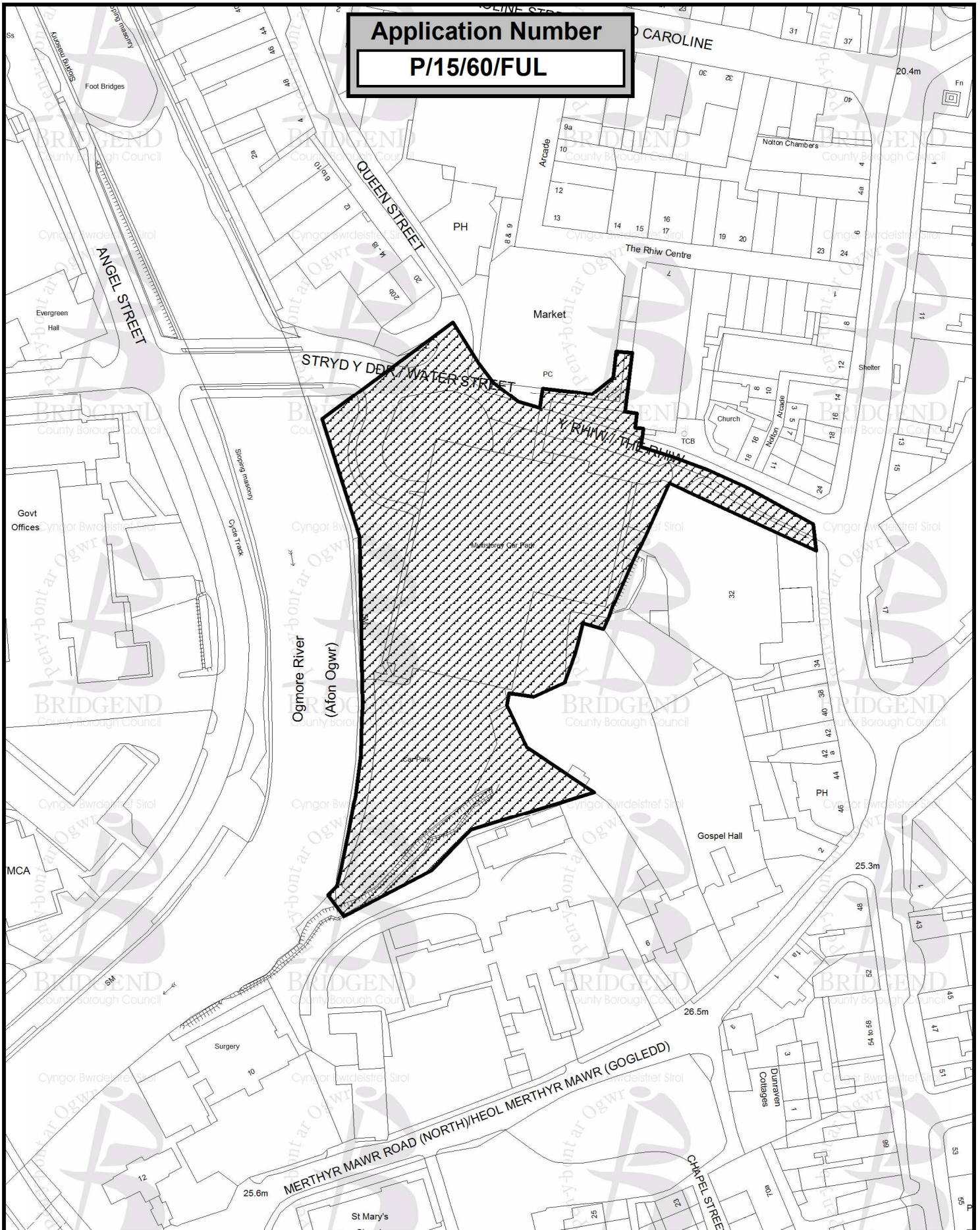
Archaeological Desk Based Assessment prepared by Archaeology Wales;

Flood Consequence Assessment Report and Drainage Strategy, Phase 1
Geotechnical/Geoenvironmental Desk Top Study Report and Transport Statement prepared by Jubb Consulting;

The application site comprises of an irregular shaped parcel of land which is flat along its river frontage and rises steeply up The Rhiw towards Nolton Street to the east and south, to the Merthyr Mawr Road Conservation area and the Rhiw Hill. The site accommodates the current Rhiw multi-storey car park and extends to approximately 1.85 acres of brownfield urban site. An existing cliff face and associated vegetation form the southern and eastern boundary to the 'open air' car park and to the north lies the boundary of the Bridgend Town Centre Conservation area which includes the central retail area of Bridgend and the Rhiw Shopping Centre. The Rhiw and Water Street form the application site's northern boundary and this currently provides the primary access route to the existing car park and links up to the wider road network including A473 to the west and the town centre to the east. In terms of access into the site, it is proposed to use the existing access road and junction at Water Street and The Rhiw.

Application Number

P/15/60/FUL



Scale 1:1,250

Date Issued:
22/04/2015

Development-Mapping
Tel: 01656 643176

Mark Shephard

Corporate Director-Communities

Communities Directorate,
Bridgend County Borough
Council, Civic Offices,
Angel Street,
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O/Drive/Plandraw/new MI layouts/
Committee DC Plan

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The new multi storey car park would provide a minimum of 240 car parking spaces. The spaces will be provided over 4 decks with the upper deck open to the elements. Due to ground levels the design of the car park is such that each deck is provided over split levels. For clarity these split levels are referred to as river side and cliff face side. At the lowest level (Deck 1) provision would be made for approximately 40 spaces at the river side. A ramp within the car park would then give access from this level up to approximately 25 spaces at the cliff face side. Approximately 17 of these spaces would be for disabled users where from level access can be gained directly to the Rhiw at the north eastern part of the site. A further ramp would then give access up to the next level (Deck 2) with approximately 41 spaces being provided at the river side. A further ramp would give access up to approximately 20 spaces at the cliff face side. A further ramp would then give access up to the next level (Deck 3) with approximately 41 spaces being provided at the river side. A further ramp would give access up to approximately 20 spaces at the cliff face side. A further ramp would then give access to the top level (Deck 4) with approximately 41 spaces being provided at the river side. The last ramp would then give access up to approximately 20 spaces at the cliff face.

The multi storey car park would include 2 lifts and stair core in order to provide pedestrian access directly to the Rhiw at the north eastern part of the site.

Site constraints and operational requirements have dictated the design of the new multi storey car park which takes on a fairly conventional form and construction. To a large extent the car park would be screened from public viewpoints by virtue of the new residential/commercial block to the side and the rising land to the rear and side, which is heavily landscaped. The west facing elevation overlooking the river would be visible and the design solution for this elevation is the use of blue grey lias limestone and cast stone cladding panels on the ground floor with horizontal louvres facing the floors above.

Access to the multi storey car park would be derived at a similar position to the existing albeit an extended access road would run all the way along the river wall to the west entering the proposed building at the southernmost section of the site. Vehicles would enter and exit the car park at the same point requiring the access road to be dual width. The car park access road has been orientated to provide for the maximum length of queuing and ensure suitable forward visibility and stacking for vehicles that may be waiting at the barrier. The access road is calmed with speed cushions to ensure 20mph or less for vehicle speeds.

The car park will be closed for approximately 9 months to allow for the demolition and construction of the new facility, with a further 6 months to complete the ancillary residential/retail unit.

RESIDENTIAL

28 residential apartments are proposed over four floors, with each floor having 7 apartments. Each of these apartments would be occupied as social housing. Each of the apartments would have two bedrooms (one double, one single) with a separate bathroom, and open plan kitchen, lounge, dining area. Access to the residential units would be gained via a lift and stair core which would be accessed either from within the car park or via a formal entrance on the western elevation. A separate fire escape is incorporated along with a refuse storage facility.

The vehicular access road to the residential car park would be shared with the multi storey car park albeit there would be a separate spur off this access road at the western elevation of the block. Undercroft parking will be provided for the residential units, 30 car parking spaces in total are proposed along with cycle stands.

The apartments are carefully designed to ensure that none of the apartment windows overlook the multi storey car park to the south. Projecting features are incorporated to all of the northern facing apartments ensuring views are afforded westwards towards the river.

The proposed finishes will comprise coloured rain-screen cladding.

COMMERCIAL

It is proposed that approximately 650 square metres of commercial space would be provided above the undercroft car park with level access achieved off the Rhiw at its easternmost side. Due to the changes in land levels the western end of the commercial space would be elevated and will form an external seating area, providing an opportunity for views towards the river and beyond.

The enclosure of the residential undercroft car park where visible will form a plinth to the scheme and will be finished in Blue Grey Lias Limestone, with cast coping stones running along its length and forming the junction to the glazing panels of the retail unit. A series of decorative metal ventilation grills will be inserted along the face of the plinth and fronting The Rhiw.

PHASING

The Planning Statement suggests that phasing of the project will be in two stages. Firstly, due to the operational requirements of the town centre it is of fundamental importance to ensure that the multi storey car park is replaced and operational as soon as practicably possible. The project brief thereby requires this to be completed by the end of June 2016. Delivery of the residential/commercial block will follow albeit construction will need to commence on this prior to the completion of the multi storey car park to achieve the brief requirement of completion by the end of 2016.

It is the intention to remove the existing bridge across to Bridgend Market and provide for an at-grade crossing that will assist in prioritising pedestrians over vehicles and increases footfall and movement along the street. The crossing is already in place.

RELEVANT HISTORY

None.

PUBLICITY

The application has been advertised in the press and on site.

Neighbours have been notified of the receipt of the application.

The period allowed for response to consultations/publicity expired on 27th February 2015.

NEGOTIATIONS

Negotiations have been undertaken in respect of a number of issues including design, materials of construction, waste and re-cycling collection and the access and car parking arrangements.

CONSULTATION RESPONSES

Town/Community Council Observations

Notified on 3rd February 2015

No objection: however Bridgend Town Council has concerns regarding the re-location of the 'shopmobility' scheme and removal of overhead walkway.

Councillor Mrs E M Hughes

I welcome apartments / houses in the town centre as these will bring vibrancy to the town.

Conservation & Design

The proposed development is located in a prominent location situated between Bridgend Town Centre Conservation Area and Merthyr Mawr Road Conservation Area and occupies an important gateway site when arriving into the town centre from a northern, southern and westerly direction.

The proposed scale of the development which is up to 5 storeys in height will mean that it will be clearly visible from within the adjacent conservation areas, particularly as you approach the site along Dunraven Place and Queen Street and from Merthyr Mawr Road to the south, particularly when there is limited tree cover/ foliage in winter months. Long distance views are also possible of the site from an elevated position from within the Newcastle Hill Conservation Area.

The site therefore provides an opportunity for a landmark building which respects its context and references local character and local distinctiveness in its design. Discussions were held about the following with the applicant's architect in relation to the original plans submitted:

North East Facing (Rhiw Hill) elevation: the design of this elevation took reference from the Georgian terraced properties in Dunraven Place in presenting vertical emphasis and a rhythm and an element of unity on the upper floors. This will be further enhanced by the agreement of a colour palette of the cladding material proposed to reflect render finishes traditionally used in the town centre. The ground floor / pedestrian lower level will be finished in traditional stone to complement the previous phase of public realm enhancements on the Rhiw Hill under the Convergence Project. Further details will be required of the glazing proportions and signage relating to the Ground Floor retail unit which can be covered by conditions. Further details will also be required for the proposed vents located at the lower ground floor level.

West facing (Riverside) elevation: Amendments were requested to emphasise the riverside nature of this elevation and to reduce the massing of this block with the northern corner of the site. Agreement was also reached to visually break the horizontal emphasis of the car park and this has been achieved

Northern Corner Elevation (River Street / Queen Street): Detailed discussions were held with regard to the shape and form of this corner which is arguably the visual focal point of the development. In an attempt to enhance this corner, a series of bay windows and a top floor balcony has been introduced which goes some way to add architectural interest to this focal point and it is considered that there is further scope to enliven this elevation through the agreement of further details and addressing the visual cantilever support for the building.

On balance, whilst there is some concern that the opportunity to provide a building of an exemplar design in this prominent location may have been missed the applicant has made a number of revisions to the original proposal to address some of the issues raised above. On balance therefore subject to the agreement of further details relating to the above via conditions, there is no objection in principle to the development.

Team Leader Building Control

No objections .

Destination & Countryside Management

The proposed development is accompanied by an Ecological Appraisal conducted by Soltys Brewster Ecology (2014).

The survey found that, with the exception of the adjacent boundary woodland, retaining wall and cliff face, the habitats associated with the site were generally considered to be of little or no ecological value. The hedgerow and woodland bordering the site are likely to function as locally important habitat for birds and bats.

Therefore, there is no requirement for additional survey effort or development licence application to the Welsh Government should the recommendations in the report (section 5) be implemented.

Economic Development

Support this application.

Head Of Street Scene (Waste & Recycling)

The arrangements for commercial waste bin collections are not clear and do not provide a suitable external area for collections. The steeply sloping footpath alongside The Rhiw would cause difficulties in placing and moving any waste wheelie bins and accidents are liable to occur.

Consideration should also be given to manoeuvrability of any waste vehicles and prevention of traffic congestion during collections.

The arrangements for residential waste and recycling collections are also unclear and do not identify who manages the bin store area.

Consideration should also be given to manoeuvrability of any waste vehicles and prevention of traffic congestion during collections.

Head Of Street Scene (Drainage)

No objection subject to conditions.

Head Of Street Scene (Engineers)

I am happy that all engineering aspects of the work are being looked at thoroughly; this includes demolition of the existing car park as well as the construction of the new car park, commercial unit and flats. Site investigations, asbestos and topographic surveys together with investigations into the condition of the existing structure and elements such as the rock face and boundary walls have been undertaken, as have the requisite searches on the existing services, etc.

Welsh Water Developer Services

No objection subject to conditions.

Crime Prevention Design S.Wales Police

The Crime Prevention Design Advisor has provided general observations in respect of the development and has confirmed that, as the development is for social housing, Secured by Design (SBD) specifications and standards must be met for the housing part of the development.

Glamorgan Gwent Archaeological Trust

The proposals will require archaeological mitigation.

The supporting information includes an archaeological desk-based assessment undertaken by Archaeology Wales (report dated September 2014, reference: 1265); this report meets current professional standards, has collated and assessed information from appropriate sources and includes the results of a site visit. The assessment details the historical background of the site within a defined study area and notes the site of the 12th century castle adjacent to the south; the potential for medieval remains is considered. The later post-medieval development of slaughter-houses and tannery at the site is described and the historic mapping sequence illustrates some of this later development. In assessing the impact, it is noted that there is potential for remains to exist, particularly in the southern part of the site where there has been less significant disturbance to the area. The arch in the rock face may relate to the later industries but given its location may be earlier; the development may obscure this and there is

currently no detailed record of it.

The demolition and any ground clearance, the new build and further elements of development, any groundwork to enable access and services installation have the potential to encounter remains of the tannery and other features and finds.

Whilst we have no objection to the positive determination of this application, we recommend that two conditions should be attached to the consent, to mitigate the impact of the work on any buried archaeological resource and also on the historic structure.

Group Manager Public Protection

No objection subject to conditions.

REPRESENTATIONS RECEIVED

Edith Hughes, 9 The Retreat

I welcome apartments / houses in the town centre as these will bring vibrancy to the town

Objections Have Been Received As Follows:, .

Residents from 21 Kensington Drive, 34 Camberwell Avenue and an ex-resident of Bridgend, now residing in New South Wales have objected to the proposal on the following grounds (summarised):

1. Repairs to the current car park are not viable due to concrete fatigue but to replace it with the proposed is not viable to the economic regeneration of the town centre;
2. The pedestrianisation of the whole town centre has led to a lack of passing traffic, footfall is down. Decreasing car parking is not a feasible option;
3. The town centre does not need Social Housing and more retail outlets;
4. Grant money would be better spent on health care, policing;

Colliers International on behalf of Creative Assets Global Ltd, (owners of The Rhiw Shopping Centre) have objected to the development on the following grounds:

5. Justification for loss of significant amount of town centre parking;
6. Methodology for car park count used;
7. Examination of impact of town centre trade on loss of permanent car parking spaces and displacement of trade during construction period; Strategy for alternative car parking including possibly adjusted pricing strategy for 9-12 months of construction;
8. Justification of permanent removal of existing pedestrian access from car park to Rhiw Market and Rhiw Centre and quality and safety of alternative at grade access from car park to Rhiw Centre;
9. It is possible that the proposed development does not meet town centre retail objectives as described in PPG Wales (7) and the Council's adopted LDP and supporting documents.

Traffic and Transport Planning on behalf of Creative Assets Global Limited have submitted a

further objection to the development which examines whether (i) the application is in accord with the transport aspects of the Bridgend Town Centre Masterplan and (ii) the Transport Statement submitted with the application assesses fully the impact of the proposed development on parking in the town centre.

In summary, the report concludes that the application has disregarded the aim of the Masterplan Framework to create a vibrant and successful visitor destination. Furthermore, the application has not addressed the impact on shopping in the town centre resulting from the closure of the Rhiw Car Park, the reduction in capacity and the transfer of Shopmobility to the Brackla Multi-storey car park. The report substantiates the above objections and concerns expressed by others in relation to the re-siting of the Shopmobility facility.

The Co-ordinator of the Stroke Association's Life After Stroke Community Group has objected to the proposal and a summary of the comments are provided as follows:

10. What measures are proposed by the Council for disabled persons to park after the existing Rhiw Car Park has been demolished; car parking for users of the Evergeen Hall has been reduced and currently none is provided; would BCBC consider allowing the Stroke Association access to their car park,

11. Concerned that the new car park is cutting the number of disabled bays, with an ageing population who are living longer, this seems to be short sighted and again, could cause problems for the future.

12. Is the alternative location for the Shopmobility facility appropriate - is the route safe and accessible to town and from the bus station, the distance to travel will dissuade people with mobility issues attending the Stroke Club, shops and other facilities

Patrons of the Stroke Club and other persons with mobility issues have also objected on similar grounds and letters have been received from the occupiers of the following properties: 5 Leys Close, Cowbridge; 17 Craiglas, Llangeinor; 13 De Clare Court, Boverton; Elma Rose, St Brides Major; 12 Osbourne Close, Litchard; 34 Minffrwd Road, Pencoed; 7 Cwm Coed, Bettws; 77 Hazeldene Avenue, Brackla; 17 Elm Crescent, Bryntirion;

Colliers International holding objection set out above has been formalised in a six page objection received on 21st April 2015. They have requested that the current plans and supporting planning and highways statement are withdrawn and fundamentally re-examined in order to:

a. Complement the existing number of spaces at 368 or alternatively demonstrate that reducing the number by 35% to 231 (planning application figure) would have no adverse retail impact on the vitality and viability of the Rhiw Shopping Centre and town centre, especially in the light of current high vacancy rates and significantly lower footfall than in previous years.

b. Review the decision to remove the shop mobility scheme to an edge of town centre location including demonstrating that its removal from a location in the town centre with easy links to the Rhiw Shopping Centre would not disadvantage existing vulnerable user groups.

c. Review the decision to remove the pedestrian walkway including demonstrating that its removal and replacement with an 'at grade crossing' of the Rhiw would positively enhance the opportunities to increase footfall at this southern entrance from current figures and would not disadvantage users from vulnerable groups.

The following observations are provided in response to the representations received:

1. The car park is beyond its working life, and parts of the car park are currently closed off. The most viable option is the re-development of a new higher quality car parking facility that will protect the town centre as a retail destination. The loss of the car park long term is not an acceptable option.
2. No evidence has been presented to suggest that the pedestrianisation of the town centre has led to a reduction in footfall. Other factors such as economic downturn may have resulted in changes.
3. The long term success of Bridgend Town Centre is dependent upon investment by private enterprise, in partnership with the Council where possible. National policy encourages a diversity of uses in town centres and mixed use developments are encouraged to promote lively centres and reduce the need to travel. The proposal accords with both national and local policy.
4. Funding received under the Vibrant and Viable Places framework is for re-generation projects which include The Rhiw Gateway Scheme. Funding for health care and policing is not via a grant but directly from Central and Local Government.
5. Question 11 on the planning application form provides a breakdown of vehicle parking associated with the existing and proposed multi-storey car park. The headline figures are the reduction in car parking spaces from 302 (current provision) to 231 (a loss of 71 spaces), a reduction in disabled parking spaces from 19 to 17 (a proportionate reduction of two spaces) and the provision of 54 new cycle spaces in the new car park (no spaces are currently provided).

The reduction in car parking provision has to be considered in the context of national and local planning which generally supports the provision of lower levels of car parking and encourages more sustainable forms of transport such as public transport, cycling and walking. Furthermore, through grant money (Vibrant and Viable Places) the Council has a unique opportunity to replace a car park that is beyond its working life which, if not replaced, could in the future become completely redundant. A new facility with the 'Pay on Foot' system of charging will benefit all future visitors to the town centre and will improve the shopping environment.

The Council has commissioned a wider review of car parking provision in the town which was undertaken and completed by Capita in November 2014. Various scenarios have been modelled, including the loss of the existing Rhiw Car Park, and the survey indicates that existing public and private car parks provide capacity for short stay shoppers and long stay town centre workers. The report does however confirm that the closure of the 'Sunnyside' and Rhiw Car Park will create a situation where demand for spaces will just be met by 'supply' (100% saturation). Alternative provision for Council Staff will be provided on the former Coed Parc Library site, off Park Street and the former Lorne Stewart site off Brackla Hill, the latter in the future will also be used for public car parking. The rationalisation of Council staff car parking is to 'free up' space within the existing and proposed Rhiw Car Park for shoppers and visitors to the town centre. The situation will be monitored and other sites close to the town centre will be brought forward if there is an indication that the existing provision is being exceeded.

The reduction in car parking is accepted on the basis that mitigation is offered and that the impact on users of the town centre and consequently traders will not be significant. Furthermore, the department has received assurances that the car parking situation will be monitored and additional spaces can be delivered, if necessary, in the future.

6. The Group Manager Transportation and Engineering (Highways) has confirmed that the methodology used by Capita in assessing car parking numbers complies with industry standards.

7. The applicant's Planning Statement recognises that there is a clear relationship between the quantity of car parking and footfall. Towns with higher footfall have more car parking spaces. It is accepted by all parties that not replacing the Rhiw car park will have a significant detrimental impact on the prosperity of the town.

No evidence has however been provided to indicate that the reduction in the car parking spaces, as discussed above, will significantly impact on trade although some disruption is inevitable during the closure of the car park. Alternative provision will however be on offer and the Council will endeavour to publicise changes to the parking arrangements and manage the impacts in the short term. During the construction period, shoppers will be re-directed to the other car parks including the Brackla multi-storey car park at Cheapside which will also accommodate the relocated Shopmobility service.

8. The principle of demolishing the car park and pedestrian link is considered to be justified on the basis that the existing structures are an eyesore which seriously detract from the visual amenities of the area. The proposals include the safe removal of the existing walkway bridge and making good of third party land, where appropriate, to ensure continuity of the street environment and public realm. The car park and pedestrian link lie adjacent to the Bridgend Town and Merthyr-mawr Conservation areas and at the heart of the commercial centre. An opportunity to redevelop the site will enhance the character and appearance of the area which will lead to an improved shopping environment.

The 'at grade' crossing will provide a safe and convenient 'link' from the new multi-storey car park to the Rhiw Centre and represents an acceptable alternative to the existing unsightly link. No evidence has been provided to indicate that the loss of the covered link will reduce the footfall through the town centre.

9. Chapter 10 of Planning Policy Wales: Planning for Retail and Town Centres requires that development plans address six aspects which include the establishment of the strategic role to be performed by the main centres in the retail hierarchy, measures to reinvigorate particular centres and policies to achieve vital, attractive and viable centres. The adopted Bridgend Local Development Plan aligns with national policy, a matter recognised by the LDP Inspector.

Local Planning Authorities should also take into account ten criteria in the determination of an application for retail development, including redevelopment that range from compatibility with a development plan strategy, a sequential approach to site selection, impact on existing centres, accessibility by a variety of modes of travel and impacts on overall travel patterns. Again having examined the development against both local and national policy, the re-development on a matter of principle does accord with the policies and objectives.

10 & 11. On the basis of the objections received it is clear that users of the Evergreen Hall, particularly those that attend the 'Stroke Association' meetings will be inconvenienced by the loss of the Rhiw Car Park. Regrettably, the structural condition of the car park has resulted in the closure of sections of the car park and that situation is only likely to get worse. This project will provide a new facility with improved parking opportunities for disabled persons, albeit there will be a slight reduction in numbers. The expressed concerns are more a parking management issue during the time between the car park being demolished and the new facility being in place. Surface pay and display car parks are available under the Bowls Hall and dedicated disabled spaces are provided although it is acknowledged that this will be a greater distance to travel. The Group Manager Transportation and Engineering (Highways) has indicated that the car parking situation in the town centre will be monitored and whether in the short term additional spaces can be provided to the rear of the Council building is a matter that could be considered but outside the planning process.

12. The re-location of the Shopmobility service to Brackla Street Multi storey car park was agreed by Cabinet on 11th November 2014. The decision was informed by a survey carried out

with users of the service during the months of August and September 2014. The respondents who represented the majority of regular, high frequency users provided information in determining the future delivery of the service. The chosen location of the scheme needs to be within a five minute journey time of the retail core, must be able to provide an appropriate number of car parking spaces for service users' cars and be within reach of toilet facilities. Both the Brackla 3 car park (behind Wilkinsons) and the Brackla multi-storey car park are within a five minute journey of the town centre core. However, the Brackla 3 car park is a very popular car park with shoppers and has a high occupancy rate. Furthermore, it is popular amongst convenience shoppers. Re-provision of the Shopmobility service, which would include office and toilet facilities, scooter parking and service user car parking on this site, would result in a significant loss of convenient spaces in the town centre. Furthermore in Brackla 3 Shopmobility users would also be exposed to adverse weather conditions.

The Brackla multi-storey is within a five minute journey of the retail core and good Shopmobility facilities can be provided, with sufficient service user allocated spaces, toilets and an office, under cover.

The decision to relocate the facility is not subject to planning permission and, although the new location is not as convenient when considered in relation to the Rhiw Shopping Centre, it is nonetheless appropriate for future users.

APPRAISAL

The application is referred to Committee for determination given the level of objection that has been received.

National policy and guidance (including Planning Policy Wales 7, TAN 2 - Affordable Housing, TAN 12 - Design, TAN 15 - Development and Flood Risk, TAN 18 - Transport) and local policy and guidance (Bridgend Local Development Plan, SPG 18 - Residential Development, The Bridgend Town Centre Masterplan) have informed the design process and the assessment of the application.

Section 38 of the Planning and Compulsory Purchase Act 2004 requires that, where the development plan is material to the determination of a planning application, 'the determination must be made in accordance with the plan unless material considerations indicate otherwise.'

The Bridgend Local Development Plan 2006-2021 (LDP) was adopted by the Council in September 2013 and is the starting point for the assessment of this application. 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.

The application site lies within the Primary Key Settlement and Sub-Regional Retail Centre of Bridgend and is allocated as a key development site under Policy REG9 (2). Refurbishment or redevelopment of such sites for retail, office, other commercial, leisure and complementary uses will therefore be favoured due to its contribution to the regeneration of the town centre. Additionally, Policy SP10 of the LDP states that all new development proposals within retailing and commercial centres should provide retail, community or commercial floor space on the ground floor and that retail, office, other commercial and leisure developments shall be of a scale appropriate to the centre within which they are located and should contribute to or sustain the vitality and attractiveness of the town centre. In terms of the proposed 28 residential units above the commercial development, the site represents a 'windfall' site within the main settlement of Bridgend in the context of Policy COM3 of the LDP. The introduction of residential accommodation to the town centre will aid efforts to stimulate vibrancy through greater footfall and increase perceptions of safety, particularly in the evenings, when fear of crime generally rises due to anti-social behaviour.

Strategic Policy 2 establishes criteria which represents the starting point for the assessment of all planning applications. The proposal will be assessed against each criterion as follows:

(1) Complying with all relevant national policy and guidance where appropriate;

The Planning Statement submitted in support of the planning application includes a comprehensive review of the relevant national policy and guidance.

The regeneration project will re-use brownfield land which is viewed by Welsh Government as key to creating more sustainable patterns of development. The mix of uses will deliver 'affordable' residential accommodation that is much needed and a new car park and retail unit that will improve the shopping environment and an extended commercial offer. Furthermore, the development is part of the on-going regeneration works that seek to secure Bridgend Town's position as an attractive and successful regional retail and commercial destination.

On the basis of the above, the development accords with the broad objectives of national policy.

The retention of sufficient car parking to serve the town centre is a material consideration that is discussed further in this report. National Policy recognises that car parking provision is a major influence on the choice of means of transport and the pattern of development but policy requires local authorities to ensure that new developments provide lower levels of parking than have generally been achieved in the past. The level and nature of public transport provision and a site's accessibility by a range of different transport modes are as critical in the assessment of new development as is the level of car parking provision.

(2) Having a design of the highest quality possible, whilst respecting and enhancing local character and distinctiveness and landscape character and (3) Being of an appropriate scale, size and prominence;

The Design and Access Statement confirms that the overall aspirations for the development are to create a quality mixed use / housing scheme that delivers a strong sense of place and community within the Town Centre of Bridgend. The key principles that have informed the design of the scheme include: (i) enhancing the multi-storey parking with a mixed use development to improve the physical linkages with the town centre; (ii) a residential scheme back into the town centre; (iii) the levels for residential access and egress were required to be set above the flood level; (iv) the proposal should reflect 'secured by design' principles; (v) the design of the scheme should ensure that the buildings are of high quality and fit for purpose; (vi) the provision of a suitable vehicular access into the site; (vii) Sustainable principles;

In terms of design the development has evolved through many design iterations in response to comments provided by both the Design Commission for Wales and Local Planning Authority.

The issue of an appropriate scale for the development (Criterion 3) has been important and the designer's aim has been to create a legible sequence of buildings and spaces that provides an appropriate response to scale within the context of the town centre and adjoining conservation areas so as to ensure that the development does not have an overbearing impact on adjoining plots, spaces or buildings. Projecting features are incorporated in all of the northern facing apartments ensuring views are afforded westwards towards the river. These features also help to break up the mass of the building providing 'articulation of this elevation and opportunities for incorporating different colour palettes helping to create a sense of place and context relevance'. Furthermore, the apartments are carefully designed to ensure that none will overlook the multi storey car park to the south.

The former Boards Garage site to the east of the application site has recently been cleared to make way for a new private surface car park, consented under application P/14/486/FUL. The proposed development has however been designed in a manner that should not prejudice any

future development proposals on the land. No habitable room windows in the proposed apartments will directly overlook the site and a degree of separation will be achieved between any future developments.

It is considered that the proposed building will make a positive and distinctive statement visually. The Planning Statement confirms that 'given that the site acts as a gateway to Bridgend town centre from the west it is important to celebrate this with a building of substance which not only raises the bar in terms of design quality but is respectful of the character and appearance of adjacent conservation areas'.

Subject to the agreement of the materials of construction and the colours of the finishes, the proposal achieves the stated aims as set out in the Design Statement and, furthermore, addresses the objectives of national and local policy on design.

The site is framed by two conservation areas and so is located within an area of archaeological significance which is recognised as the former village of Oldcastle. The appraisal acknowledges that the existing car park may have destroyed any archaeological deposits, however it highlights there are possibly remains of eighteenth and nineteenth-century tanning pits including the stone-wall and archway on the eastern edge of the rear car park which are likely to be remains of buttress walls of the former nineteenth-century tannery buildings. Accordingly the appraisal acknowledges that any excavations may reveal nineteenth-century tan pits which could be observed during a watching brief in this area and states, if the potential development impacts on the wall and arch, the remains would need to be cleared of some of the ivy and recorded; a detailed photographic record is suggested as the preferable option.

Glamorgan Gwent Archaeological Trust has no objection to the positive determination of the planning application but has recommended that conditions be attached to the consent to mitigate the impact of any works on any buried archaeological resource and also on historic structures.

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 and 5) Providing for an appropriate mix of land uses which have good walking, cycling, public transport and road connections within and outside the site to ensure efficient access (criterion 6);

The proposal represents a high quality mixed use development including medium to high density housing on a brownfield site in a highly sustainable location which has been designed to respect the surrounding land uses - the aforementioned criteria is addressed by the proposal.

(7) Minimising opportunities for crime to be generated or increased;

The proposals have been designed to provide natural surveillance to deter crime, whilst ensuring the security of residents through suitable boundary treatments. The Design and Access Statement confirms that communal entrances within the development will be fully secured with access only available to residents or authorised persons by keypad control or similar. The external space has been designed to be fully overlooked to give the necessary natural surveillance, such that residents are able to assume a level of ownership. Materials will also be selected to be robust, particularly at lower levels where the chances of damage are greater. Recessed spaces where people can loiter have been minimized, however, where they are unavoidable, then it is accepted that specific use of CCTV and enhanced lighting will be required. The observations of the Crime Prevention Officer have been forwarded to the applicant's agent.

(8) Avoiding or minimising noise, air, soil and water pollution;

No adverse representations have been received from consultees and the matter of site drainage will be controlled through a planning condition requiring the agreement of a comprehensive

drainage scheme (foul and surface water) prior to any development commencing. Noise will be addressed later in this section of the report.

(9) Incorporating methods to ensure the site is free from contamination (including invasive species) and 10) Safeguarding and enhancing biodiversity and green infrastructure;

No invasive species are present on site.

An appraisal of the site ecology has been undertaken by Soltys Brewster Ecology and assessed by the Council's Ecologist. The headlines from the report indicate that the multi-storey car park is considered to be of little ecological value, although the rock face and retaining wall at the rear of the car park is considered may have some bat roosting potential.

Accordingly, the appraisal recommends 'reasonable avoidance measures'. In addition, the appraisal highlights that an unoccupied bird nest was identified within the retaining wall's drainage hole and likewise recommends that any proposed works proceed outside of the bird nesting season (1st March-31st August inclusive). The hedgerow and woodland bordering the site are likely to function as locally important habitat for bats and birds and any clearance works should be undertaken outside of the bird nesting season. Trees onsite would offer negligible bat roosting potential although a precautionary approach should be taken where any these trees require felling or pruning which should be in April or September/October by a suitably qualified arborist; felling in April should also be preceded by a thorough check for the presence of nesting birds. This is to coincide with the period of lowest likelihood of bats being present; however, if roosting bats are found the report advises that all works should immediately cease and Natural Resources Wales (NRW) contacted for advice on how to proceed.

Finally, the appraisal maintains that the design of the site lighting needs to maintain the boundary features and riparian habitat as 'dark corridors', as far as practical, and recommends further localised enhancements as part of the development including the use of bird or bat boxes, the use of plant species to promote biodiversity and the use of diverse seed mixes for amenity grassland to enhance the habitat for local birds and invertebrates.

The findings of the report have been accepted by the Council although it will be necessary to impose conditions and provide advisory notes in respect of site clearance works and biodiversity enhancements.

11) Ensuring equality of access by all.

All uses proposed under the 'umbrella' of this application have been designed to enable access by all although it will be necessary to secure a minor change to the pedestrian access to the car park off The Rhiw. The current scheme seeks to utilise the existing narrow doorway which would need to be widened. This can be addressed by the imposition of a pre-commencement condition that requires the submission of a revised access arrangement.

(12) Ensuring that the viability and amenity of neighbouring uses and their users/occupiers will not be adversely affected;

The proposed development is sufficiently distanced away from existing residential properties so as not to give rise to any overriding issues associated with residential amenity.

Furthermore, it is also considered that careful attention has been given to the scheme proposals to ensure that the residential amenities of future occupiers of the development would be appropriate given the town centre with regard to the positioning of habitable room windows to have views of the river but with no windows overlooking the multi storey car park to the south.

In terms of noise impacts, an environmental noise assessment has been undertaken by

Acoustic Consultants Ltd and the findings of the survey indicate that the site falls within an area where noise mitigation needs to be considered. As such recommendations have been made for the construction of the development and accepted by the Group Manager Public Protection. Conditions will be imposed to control development in the interest of safeguarding the amenities of the future occupiers. The noise impact from the proposed commercial use has also been considered based upon a typical A3 use and again control will be imposed to safeguard the future occupiers of the apartments through planning conditions.

The site lies within flood Zone C1, defined as 'an area served by significant infrastructure including flood defences' by the Development Advice Map (DAM) referred to in Technical Advice Note 15: Development and Flood Risk (TAN15). The zonal description referred to in TAN 15 indicates this is an area where development can take place subject to application of the justification test, including acceptability of consequences.

The proposal is defined as a development classed 'as a mainly less vulnerable development' for the retail and car park element with the residential premises classed as 'Highly vulnerable development'. The site is located within an area of the town centre served by significant infrastructure and generally the site is well above the flood risk areas.

A Flood Consequence Assessment has been undertaken by Jubb Consulting Engineers and is currently being considered by Natural Resources Wales (NRW). On the basis of the pre-application discussion, it is expected that NRW will not oppose the development. Any observations received will be brought to Members attention on the amendment sheet.

(13) Incorporating appropriate arrangements for the disposal of foul sewage, waste and water and (14) Make a positive contribution towards tackling the causes of, and adapting to, the impacts of Climate Change; and

No adverse representations have been received from statutory consultees although it will be necessary to impose a condition requiring the agreement of site drainage.

As a condition of the grant funding the applicant is committed to meeting the appropriate Code for Sustainable Homes (Level 3+) requirements and, as such, the new dwellings will seek to fully comply with the new Building Regulation standards thus ensuring that energy efficiency levels will be high.

15) Appropriately contributing towards local, physical, social and community infrastructure which is affected by the development.

As a proposal of over 5 units, the application triggers Policy COM5 of the LDP regarding affordable housing. The applicant has indicated that all 28 units will be provided as social rented accommodation which is welcomed. The LDP target of 20% for the Bridgend area would normally be secured through a Section 106 agreement but as the Council is landowner such an agreement is difficult to progress. The applicant's agent has suggested that a condition can secure the provision, although the recently published Welsh Government circular on planning conditions indicates that price, tenure and ownership should normally be secured by planning obligation. Given the complexities of securing S106 agreements on Council owned land, a condition in this instance is considered appropriate in that it will control the provision for the proposed and any future schemes for development.

Additionally, in lieu of the provision of any outdoor recreation space as part of the proposals a contribution to off-site recreation in accordance with Policy COM11 of the LDP would normally be required of the development. The developer's agent has however indicated that extensive public realm works are to be delivered as part of the project which includes:

* Making good of public realm interface with residential building - £15,000 approx.

* Making good of public realm interface with Rhiw Shopping Centre - £8,722 approx.

* Soft landscaping works - £7,500 approx.

In cost terms, the scheme will deliver the equivalent environmental and community benefit which, in this case, can justify the Council setting aside the requirement for an off-site contribution toward recreation facilities. It should be noted that the site is close to amenities within the town centre and open spaces and play provisions in Newbridge Fields.

As a scheme of more than 15 apartments, the proposal triggers the need to consider the requirement for an Education Contribution in accordance with SPG16. The pupil generation formula in Table 1 of the SPG demonstrates that 2 Primary age and 1 Secondary age child would be generated by the development. However, the Children's Directorate has indicated that this level of pupil numbers could be accommodated within existing local schools.

On the basis of the assessment above, it has been established that the proposed development is compatible with national policy and has responded to the site constraints to achieve a satisfactory scale and size, which efficiently utilises this brownfield site and provides an acceptable mix of uses which is compatible with local policy. Furthermore, adequate car parking provision will be provided to serve the town centre and occupiers of the new development.

CONCLUSION

This application is recommended for approval because the development complies with national and local policies and guidelines and does not adversely affect privacy or visual amenities nor so significantly harms neighbours' amenities as to warrant refusal. Furthermore, the development will not be detrimental to highway safety.

RECOMMENDATION

(R02) That permission be GRANTED subject to the following condition(s):-

- 1 The development shall be carried out in accordance with the following approved plan numbers 3924-A-00-01 (Rev B) 02 (Rev C) 03 (Rev B) 04 (Rev B) 05 (Rev B) 06 (Rev B) 07 (Rev B) 08 (Rev B) 09 (Rev B) 10 (Rev B) 11 (Rev B) and 13 (Rev A) and the following documents: Tree Survey, Categorisation & Constraints Report - Steve Ambler and Sons Tree Specialists Ltd - October 2014; Transport Statement - Jubb - January 2015; Environmental Noise Assessment - Acoustic Consultants Limited - January 2015; Ecological Appraisal - Soltys Brewster Ecology - October 2014; Archaeological Desk Based Assessment - Archaeology Wales - September 2014 and Flood Consequence Assessment Report & Drainage Strategy - Jubb - January 2015

Reason: To avoid doubt and confusion as to the nature and extent of the approved development.

- 2 No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the Local Planning Authority. The approved Statement shall be adhered to throughout the demolition and construction period. The Statement shall provide for:
 - a. the parking of vehicles of site operatives and visitors;
 - b. loading and unloading of plant and materials;
 - c. storage of plant and materials used in constructing the development;
 - d. the erection and maintenance of security hoarding;
 - e. wheel washing facilities
 - f. measures to control the emission of dust and dirt during demolition/construction
 - g. a scheme for recycling/disposing of waste resulting from demolition and construction

works

Reasons: In the interests of highway safety and to safeguard the amenities of the area.

- 3** No development shall commence until a phasing plan identifying all phases of development has been submitted to and approved in writing by the Local Planning Authority. The phasing plan shall include commencement and practical completion of all principal elements, including the car park, commercial unit and residential apartments and all other associated works. Thereafter all phases of the development shall be completed and carried out in accordance with the agreed phasing plan agreed by the Local Planning Authority.

Reason: To secure the programming and phasing of, and an orderly pattern to the development.

- 4** No development shall commence until a detailed scheme for the demolition of the pedestrian walkway and bridge and including details of works to make good the residual structures has been submitted to and agreed in writing by the Local Planning Authority. The works shall then proceed in accordance with the scheme agreed by the Local Planning Authority.

Reason: In the interests of highway safety and to safeguard the amenities of the area

- 5** No development, apart from the demolition of the existing car park, shall begin until a scheme for the provision of affordable housing as part of the development has been submitted to and approved in writing by the Local Planning Authority. The affordable housing shall be provided in accordance with the approved scheme and shall meet the definition of affordable housing in Welsh Government Technical Advice Note 2: Affordable Housing (2006) or any future guidance that replaces it. The scheme shall include:

a. the numbers, type and tenure of the affordable housing provision to be made which shall consist of not less than 20% of housing units;

b. the timing of the construction of the affordable housing;

c. the arrangements to ensure that such provision is affordable for both first and subsequent occupiers of the affordable housing; and

d. the occupancy criteria to be used for determining the identity of occupiers of the affordable housing and the means by which such occupancy criteria shall be enforced.

Reason: To ensure that the Local Planning Authority retains effective control over the development and to ensure that the development provides affordable housing in accordance with policy COM 5 of the Bridgend Local Development Plan.

- 6** Apart from the demolition of the existing car park, no development shall commence on any phase of the development until the following information has been submitted to and agreed in writing by the Local Planning Authority:

a. Detailed specification and samples of, the materials to be used in the construction of the external surfaces of new car park, commercial unit and residential building;

b. Details and finishes at a scale of 1:5 of the following: (i) window units in the residential and commercial buildings, (ii) typical external doors (including fire doors), (iii) the proposed plant screening, (iv) decorative metal ventilation grills, (iv) security gates, (v) the car parking louvres and cladding panels, (vi) the cantilever support.

Development on each phase shall be carried out in accordance with the agreed details.

Reason: To ensure that the proposed materials of construction are appropriate for use on the development so as to enhance and protect the visual amenity of the area.

- 7** No development, apart from the demolition of the existing car park, shall commence until the implementation of an appropriate programme of building recording and analysis has been submitted to and agreed in writing by the Local Planning Authority, to be carried out by a specialist agreed by the Local Planning Authority and in accordance with an agreed written brief and specification.

Reason: As the structure is of architectural and cultural significance the specified records are required to mitigate impact.

- 8** No development, apart from the demolition of the existing car park, shall commence until a written scheme of archaeological investigation and mitigation has been submitted to and approved in writing by the Local Planning Authority. Thereafter, any necessary works identified and agreed in writing by the Local Planning Authority will be fully carried out in accordance with the requirements and standards of the written scheme.

Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource.

- 9** No development, apart from the demolition of the existing car park, shall commence until a scheme shall be submitted to and approved in writing by the Local Planning Authority to provide that all habitable rooms shall be subject to sound insulation measures to ensure that all such rooms achieve internal noise level of 35dBA Leq 16 hour during the day and 30 dBA Leq 8 hour at night. The scheme shall include the recommendations for noise mitigation for the external sitting area as stated in 8.2, paragraph 4 of Environmental Noise Assessment: Acoustic Consultants Limited: January 2015. The scheme shall ensure that habitable rooms, subject to sound insulation measures, shall be provided with acoustically treated active ventilation units. Each ventilation unit (with air filter in position), by itself or with integral air supply duct and cowl (or grille), shall be capable of giving variable ventilation rates ranging from:

(i) An upper rate of not less than 37 litres per second against a back pressure of 10 newtons per square metre and not less than 31 litres per second against a back pressure of 30 newtons per square metre, to:

(ii) A lower rate between 10 and 17 litres per second against zero pressure

The scheme shall also include the additional measures to be implemented to address flanking sound transmission paths from the commercial units to the residential properties. This scheme shall take into account the recommendations set out in point 8.2 of Environmental Noise Assessment: Acoustic Consultants Limited: January 2015.

The development shall be carried out in accordance with the agreed scheme.

Reason: To maintain noise levels at a sustainable level in the interests of residential amenities.

- 10** No habitable rooms shall be located in the southern elevation of the residential development, overlooking the proposed multi storey car park (facade B as indicated on the plan that accompanied the Environmental Noise Assessment: Acoustic Consultants Limited: January 2015).

Reason: To maintain noise levels at a sustainable level in the interests of residential amenities.

- 11** Cumulative fixed plant noise limits shall be restricted to the following rating level when assessed using BS 4142:

Time Period:

Daytime (07:00 hours to 23:00 hours) Plant Noise Limit: 48 LAr (1 hour) dB

Time Period:

Night time (23:00 hours to 07:00 hours) Plant Noise Limit: 35 LAr (15 minutes) dB

Reason: To maintain noise levels at a sustainable level in the interests of residential amenities.

- 12** No development, apart from the demolition of the existing car park, shall commence until a scheme has been submitted to and approved in writing by the Local Planning Authority to demonstrate how odour from the preparation and cooking of food at restaurants and food outlets will be controlled to ensure that the odour does not impact on the proposed residential flats. The scheme shall be implemented in full prior the commercial units being brought into beneficial use.

Reason: In the interests of safeguarding the amenities of the future occupiers of the residential units.

- 13** No development, apart from the demolition of the existing car park, shall commence until a scheme for the comprehensive and integrated drainage of the site showing how foul drainage, road and roof/yard water will be disposed of, including future maintenance requirements, has been submitted to and agreed in writing by the Local Planning Authority. The agreed scheme must be implemented prior to each respective phase of the development being brought into beneficial use.

Reason: To ensure safe drainage of the site.

- 14** Notwithstanding the submitted information, no development, apart from the demolition of the existing car park, shall commence on site until full details of the Retail and Residential Waste Strategy has been submitted to and approved in writing by the Local Planning Authority. The Retail and Residential Waste Strategy shall specify that all waste should be collected between 07.00 hours and 19.00 hours Mondays to Fridays. Development shall be carried out in accordance with the approved Strategy.

Reason: In the interests of highway safety and residential amenity.

- 15** No development, apart from the demolition of the existing car park, shall commence until full details of both hard and soft landscape works have been submitted to and agreed in writing by the Local Planning Authority and these works shall be carried out as approved. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc.); proposed and existing functional services above and below ground (e.g. drainage power, communications cables, pipelines etc. indicating lines, manholes, supports etc.); retained historic landscape features and proposals for restoration, where relevant. The agreed landscaping works shall be carried out in accordance with a programme agreed in writing by the Local Planning Authority prior to any new building works commencing on site.

Reason: To maintain and improve the appearance of the area in the interests of visual amenity, and to promote nature conservation.

* THE FOLLOWING ARE ADVISORY NOTES NOT CONDITIONS

This application is recommended for approval because the development complies with national and local policies and guidelines and does not adversely affect privacy or visual amenities nor so significantly harms neighbours' amenities as to warrant refusal. Furthermore, the development will not be detrimental to highway safety.

The archaeological work should be undertaken to the Standards and Guidance of the Chartered Institute for Archaeologists (CIfA) and it is recommended that a Registered Organisation with CIfA or a MCIfA Level Member should be employed for this purpose.

In order to discharge Condition 12, the Developer should provide the following information:

- a. Detailed Engineering Design Drawings;
- b. Revised information about the design calculations, storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent the pollution of the receiving groundwater and/or surface water.
- c. Confirmation from DCWW with regard to consents to discharge to the public sewerage system
- d. Management and maintenance arrangements for any private elements of the drainage and any other arrangements to secure the operation of the scheme throughout its lifetime and the lifetime of the development.

Contractors should be made aware that there is a possibility of encountering bat roosts unexpectedly during the development work. In the unlikely event of bats being found to be present on site, work should stop immediately and advice sought from the Natural Resources Wales, (NRW) (tel. 02920 772400).

Work should ideally be carried out in the autumn/winter months (October to March inclusive) when bats are least likely to be present. This should also minimise the potential for encountering nesting birds that are also afforded statutory protection.

The developer is advised that British bats and their breeding sites and resting places are protected by law through UK legislation under the Conservation of Habitats and Species Regulations 2010 which implements the EC Directive 92/43/EEC in the United Kingdom and the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000). This legislation makes it an absolute offence to damage or destroy a breeding site or resting place (sometimes referred to as a roost, whether the animal is present at the time or not), intentionally or recklessly obstruct access to a place used for shelter and protection, or deliberately capture, injure, kill, or disturb a bat/bats.

The developer is reminded of their legal requirement to consider wildlife on their development site. Further information on wildlife and development can be found in the Biodiversity and Development Supplementary Planning Guidance (SPG): A Green Infrastructure Approach.

Consideration should also be given to the provision of nest boxes within the development for bat and bird species. Suitable bird species include house sparrow, swift, sand and house martin, species which are declining in number due to a reduction in suitable nest sites. Further information can be found on page 55 sections 16.0 in the Biodiversity and Development: A Green Infrastructure Approach SPG. The incorporation of bat bricks, bat tiles and bat boxes into the development, would provide summer roosting opportunities for bats and would contribute to the environmental sustainability of the development. Further information can be found on page 46 section 7.0 of the above SPG. Incorporation of biodiversity enhancements will help contribute to the environmental sustainability of the development. This will demonstrate local authority compliance with S40 of the Natural Environment and Rural Communities (NERC) Act 2006, to have regard to conserving biodiversity.

MARK SHEPHARD
CORPORATE DIRECTOR COMMUNITIES

Background Papers

None