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Grwp Datblygu/Development Group (Planning)

Deialu uniongyrchol / Direct Line: 643173

Gofynnwch am / Ask for: Mr P Thomas

Ein cyf / Our ref: PE/197/2020

Eich cyf / Your ref:

Dyddiad / Date: 30th July 2020

Dear Laura,

PRE-APPLICATION SCOPING MEETING ERECTION OF TENNIS CENTRE ISLAND FARM

Thanks to all for your attendance and valuable contributions to the on line meeting on 8th June 2020 in relation to the above project. The purpose of the scoping meeting was for Officers to understand the project in greater detail and to identify the level of pre-application advice that can be offered and what input will be required from other consultees, both internal and external as part of the pre-application process.

PROPOSAL

The project is detailed in the supporting letter prepared by Savills on behalf of your clients, HD Limited. The enquiry has also been accompanied by the following documentation:

- Proposed Site Layout Plan – reference 9806-SK1 (prepared by Roberts Limbrick, dated 18 May 2020)
- Transport Statement (prepared by Corun Associates, dated May 2020)

As shown on the enclosed draft layout plan, the proposed tennis centre will comprise of the following elements:

- An indoor tennis centre which will include 4 x indoor tennis courts as well as ancillary and supporting uses;
- 4 x outdoor tennis courts;
- 2 x outdoor padel-tennis courts;
- A total of 58 car parking spaces to serve the tennis; and a
- A comprehensive soft and hard landscaping scheme.

PROCEDURAL MATTERS

The proposal constitutes 'Major Development' and would be a project listed under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment (Wales) Regulations 2017 (the EIA Regulations). You may request that the Council issues a formal screening opinion as to whether the

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We welcome correspondence in Welsh. Please let us know if your language choice is Welsh

proposed project falls within the remit of the EIA Regulations and requires Environmental Impact Assessment (EIA). At this stage, it would seem unlikely that the proposal would constitute EIA development.

The requirement to undertake pre-application consultation, as set out in part 1A of the Development Management Procedure (Wales) Order 2012 applies to all planning applications for 'major' development, whether for full or outline permission. Prior to submitting an application for major development, the developer must:

- publicise a draft of the application - that is the information that would be required to be submitted as part of a formal planning application. This includes: Scaled plans, with north arrow, to identify the land to which the application relates; all other scaled plans, drawings and information that would be required to describe the proposed development – this includes any technical documents that would be needed in order to validate any subsequent application; Design and Access Statement; Draft Environmental Statement if required.
- consult landowner or occupier of adjacent land, the community including town and community councils and local members and 'specialist consultees' (the developer should display site notices on or near the site for a 28 day period) -
- write a report about the pre-application consultation undertaken – this will accompany the subsequent application

The list of 'specialist consultees' was briefly discussed at the meeting. I would recommend that it includes the following:

- Transportation and Engineering (Highways) – Contact: Robert Morgan – Rob.Morgan@bridgend.gov.uk
- Countryside Management Team (Ecology) – Contact: Robert.Jones@bridgend.gov.uk
- Land Drainage (SAB Approval) – Contact; Gethin.Powell@bridgend.gov.uk
- Shared Regulatory Services (Pollution Control – Noise) – Contact: hewilliams@valeofglamorgan.gov.uk
- Natural Resources Wales (Ecology and Drainage) – Contact: swplanning@cyfoethnaturiolcymru.gov.uk

The site is located in the Oldcastle Ward which is represented by Councillors Matthew Voisey and Lyn Walters - Cllr.Matthew.Voisey@bridgend.gov.uk and Cllr.Lyn.Walters@bridgend.gov.uk

Full contact details are available on the Council's website at the following link:

<https://democratic.bridgend.gov.uk/mgMemberIndex.aspx?FN=WARD&VW=TABLE&PIC=1>

Mrs Leanne Edwards is Clerk to Bridgend Town Council and may be contacted at: Carnegie House, Wyndham Street, Bridgend, CF31 1EF (Tel: 01656 815757)

Full details of the above procedures can be found in Section 6.4 of the Development Management Manual 2017 <http://gov.wales/docs/desh/publications/170505development-management-manual-en.pdf>

POLICY CONTEXT

The local policy context for your client's proposal is understood but I will reference the key policies that will need to be considered as part of any future planning submission:

Policy ENV1 – The enquiry site is located in the countryside as defined by Policy PLA1. Development will be strictly controlled but may be acceptable where it is necessary for: Outdoor Recreational and Sporting Activities. Where development is acceptable in principle, it should where possible, utilise existing buildings and previously developed land and/or have an appropriate scale, form and detail for its context. Mindful of the extant permission on site, any future application would still have to be assessed against this policy.

Policy SP2 – the overarching policy that requires all development to be of the highest quality and establishes 15 criteria against which all development proposals will be assessed. This policy dovetails with the 'placemaking agenda' promoted by national planning policy, (Planning Policy Wales – Edition 10 – December 2018).

Policy PLA4: All development proposals will be required to make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change and Peak Oil issues.

Policy SP3 requires all development proposals to promote safe, sustainable and healthy forms of transport through good design, enhanced walking and cycling facilities and improved public transport provision. Welsh Government is committed to reducing the reliance on the private car and supporting a modal shift to walking, cycling and public transport. Facilitating developments that are well sited and integrated with existing land uses and neighbourhoods is key.

Policy ENV5: Green infrastructure will be provided through the protection and enhancement of existing natural assets and the creation of new multi-functional areas of green space. Green infrastructure corridors will connect locations of natural heritage, green space, biodiversity or other environmental interest. They will be safeguarded through: 1) Not permitting development that compromises their integrity and therefore that of the overall green infrastructure framework; 2) Using developer contributions to facilitate improvements to their quality and robustness; 3) Investing in appropriate management, enhancement and restoration, and the creation of new resources.

Policy ENV6 - Proposals for development or redevelopment will be required to: 1. In the first instance, retain, conserve, restore and enhance wherever possible existing: a) Woodland; b) Trees; c) Hedgerows; d) Wetlands; e) Watercourses; f) Ponds; g) Green Lanes/Wildlife Corridors; h) Geological Features; i) Other Natural Features or Habitats. 2. Where this is demonstrated not to be possible, suitable mitigation or compensatory measures will be required to secure biodiversity including future management programmes. 3. Avoid or overcome harm to nature conservation assets and/or species of wildlife which may be resident, in-situ or which can be demonstrated to have frequented habitats within the site on a migratory basis. In terms of the aforementioned policy, I would direct you to SPG19 - Biodiversity and Development. All major and sensitive developments will be expected to make a positive contribution toward enhancing green infrastructure and when determining a planning application where biodiversity could be a material consideration the Council requires adequate

ecological information from the developer. This is needed to establish whether the development proposal is likely to have a significant effect on biodiversity and to identify any measures necessary for compliance with all relevant statutory obligations and national and local planning policy.

Policy ENV7 - Natural Resource Protection and Public Health - Development proposals will only be permitted where it can be demonstrated that they would not cause a new, or exacerbate an existing, unacceptable risk of harm to health, biodiversity and/or local amenity due to: 1) Air pollution; 2) Noise pollution; 3) Light pollution; 4) Contamination (including invasive species); 5) Land instability; 6) Water (including groundwater) pollution; 7) Any other identified risk to public health or safety. Development in areas currently subject to the above will need to demonstrate mitigation measures to reduce the risk of harm to public health, biodiversity and/or local amenity to an acceptable level.

Policy SP5 – Development should conserve, preserve, or enhance the built and historic environment of the County Borough and its setting. In particular, development proposals will only be permitted where it can be demonstrated that they will not have a significant adverse impact upon the following heritage assets: Sites or Areas of Archaeological Significance. It should be noted that the enquiry site lies within such an area. Technical documentation to address this policy will need to accompany the application.

Policy SP14 – Infrastructure: Applications for development should include material proposals which deal with the fair and reasonable infrastructural requirements of the development, and which help to mitigate any negative impacts that may arise as a consequence of the development. Where appropriate, such proposals will be secured by means of planning agreements/obligations. The requirements for such agreements will include consideration of the following in the context of this development:

- Renewable energy and low carbon technologies;
- Improvements to the highway network, including walking and cycling routes and public transport;
- Protection, enhancement and management of the natural, historic and built environment;

KEY ISSUES

The following issues have been identified at this stage having considered the proposal in the context of both national and local planning policies:

Principle of the Development: The extant permission for a tennis academy on this site is a material consideration. It was however part of a comprehensive sports village development which included new stadia, office developments, green infrastructure and critically new road infrastructure with a new traffic light controlled junction onto the A48 and a link road to Bridgend Science Park. At no time was it envisaged that any development would be served from, what was originally an agricultural access off Ewenny Road. Policies SP2, SP3 and ENV1 will provide the key tests as to whether the principle of the development is acceptable.

I understand that timescales dictated by the LTA will require an application for this development to be submitted in the forthcoming months and well before any publication of the Deposit Replacement Local Development Plan. I note that your client is promoting the adjoining Island Farm site as a mixed use development with the initial iterations of the master plan incorporating the tennis centre development. That approach is supported but consideration should also be given to securing the vehicular and

pedestrian from the Island Farm site as part of that development. In any event, the weight that could be afforded to proposals in the emerging development plan will be limited.

Highways and Transport: The planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:

- are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
- are designed in a way which integrates them with existing land uses and neighbourhoods; and
- make it possible for all short journeys within and beyond the development to be easily made by walking and cycling.

Against these national policy objectives, the scheme would appear to be deficient. The accompanying Transport Statement quotes the aims of the Active Travel Act but recognises that connections to the site, on foot, are limited. Improvements are proposed but they are localised and the routes connecting the site to the wider strategic network lack the necessary widths and opportunities to upgrade. Again, it is acknowledged that the tennis centre will be incorporated into the network of active travel routes that will part of that adjacent development but that can only be afforded limited weight given the status of the emerging replacement local development plan.

The existing vehicular access arrangements are sufficient for the uses they serve but it is intended that the access road and junction layout will be improved to the benefit of all road users. These arrangement will need to be examined in greater detail at the pre-application stage or as part of a future application. Improvements will affect part of the grounds of the property known as 'The Patch' which I understand is within your client's control. Should the arrangements deemed to be acceptable, it is likely that the junction improvements will be required before any development on the site of the tennis centre commences.

The assessment of the impact of the traffic generated by the development on the highway network appears to rely on TRICS database figures and traffic counts undertaken outside the traffic neutral months. The claim that only a modest increase in traffic will be generated which is unlikely to warrant concern will have to be further considered and I would recommend that the assessment also reviews the impacts on the A48/Ewenny Roundabout junction, in particular the limited queuing capacity for vehicles travelling along the eastern approach of the A48 to the roundabout but turning south along Ewenny Road which would be relevant to your client's proposal. Consistently in the transport assessment, reference is made to the extant permission on site but I fail to see how this is relevant in highway safety terms as the tennis academy and sports village development would have been accessible via the new A48 junction and through Bridgend Science Park. Such an arrangement would have minimised the impact on the A48/Ewenny Roundabout junction.

Welsh Government policy requires designers to integrate car parking in a way which does not dominate development. Parking spaces will need to achieve the quantum required by the Car Parking Guidelines, ([SPG 17 refers](#)). The following table sets out the number of spaces that should be provided as part of the development:

Public Leisure Centres	1 commercial vehicle space	1 space per 2 facility users & 1 space per 3 spectators
Fitness Clubs, Leisure Clubs & Sports Clubs (See Note 6)	1 commercial vehicle space	1 space per 2 facility users

6. Clubhouse bar and restaurant facilities must always be separately assessed.

Site Drainage: From 7th January 2019, all new developments of more than 1 house or where the construction area is of 100m² or more will require sustainable drainage to manage on-site surface water. Surface water drainage systems must be designed and built in accordance with mandatory standards for sustainable drainage published by Welsh Ministers. These systems must be approved by the local authority acting in its SuDS Approving Body (SAB) role before construction work begins. The SAB will have a duty to adopt compliant systems so long as it is built and functions in accordance with the approved proposals, including any SAB conditions of approval. Further advice on the process can be viewed at the following link:

<https://www.bridgend.gov.uk/residents/recycling-waste-and-environment/environment/flooding/sustainable-drainage-systems/>

Land drainage was only briefly discussed at the meeting and it is understood that foul drainage connections to the site were established as part of the previous development. I would however recommend early consultation with Dwr Cymru Welsh Water. The requirements of the Flood and Water Management Act (FWMA) 2010 were acknowledged by all and the need for the surface water drainage systems to be approved by the SuDS Approving Body (SAB) before construction work begins. Application forms and contact details are available on the following website:

<https://www.bridgend.gov.uk/residents/recycling-waste-and-environment/environment/flooding/>

I understand that discussions regarding the surface water disposal are on-going with colleagues in the Land Drainage Section.

SECTION 106 OBLIGATIONS

At this scoping stage it is difficult to identify whether any S106 obligations will be required but your client should be mindful that financial contributions may be sought toward off-site improvements to the highway infrastructure.

SCOPE OF DOCUMENTS

The scope of documents listed in the supporting letter would be sufficient to allow for the validation of a planning application. I would recommend the submission of a Tree Survey and Arboricultural Impact Assessment. The proposed improvements to the access arrangements may affect a number of existing mature trees.

FORMAL PRE-APPLICATION ADVICE

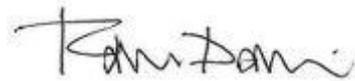
Our aim is to enable and promote high quality development and we were encouraged by your willingness to work with the Council to achieve this aim. For a project of this scale and importance, I would recommend that you use the Council's Non-Statutory Pre-Application Advice Service which will consist of a meeting followed by written advice, (£1130).

Specialist advice will be required and I would recommend that Robert Morgan (Highways Officer) Robert Jones (Ecology) and Gethin Powell (Land Drainage) attend the meeting. In total the fee for this service would be £1580 for planning advice including specialist advice based on £50 per hour for 3 hours by the Transportation Section, £50 per hour for 3 hours work by Land Drainage and £50 per hour for 3 hours work by the Ecologist.

These fees cover administration costs and the time spent in research, assessment, a meeting as necessary, and in making a written response. The Department would prefer payment to be made by credit card by telephoning the department (Tel. No. 01656 643675) where the payment can be taken.

I trust that the above information is sufficient at this time.

Yours sincerely,



Mr. Rhodri Davies BA, BTP, MRTPI
Development and Building Control Manager

c.c.	Robert Morgan	Senior Transportation Development Control Officer
	Robert Jones	Countryside Management Officer
	Gethin Powell	Highways and SUDS Drainage Engineer