



**Proposed Residential Development
Former R.A.O.B Club, Heol y Groes
Pencoed**

Planning Statement
On behalf of Caddy Holdings

DRAFT FOR PRE APPLICATION CONSULTATION

Ref: DB/180062/R0001v2

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1. Letter of correspondence from local agent

1.0 Introduction

1.1 This Planning Statement is prepared on behalf of Caddy Holdings (“the applicant”) to accompany a full planning application submitted to Bridgend County Borough Council (“the LPA”) for the development of 24 apartments at the former R.A.O.B Club, Heol y Groes, Pencoed. The application is for:

“Demolition of existing buildings and erection of 24 apartments, car parking, landscaping and associated works”.

1.2 This Statement should be read in conjunction with the following accompanying documents:

- Design and Access Statement prepared by Mango Planning and 360AD;
- PAC report prepared by Have Your Say;
- Drainage report prepared by Vale Consultancy;
- Ground Conditions report prepared by Ian Farmer Associates;
- Preliminary Roost Assessment prepared by Wildwood Ecology;
- Transport Statement prepared by Corun Associates; and
- Tree and landscape report prepared by Cardiff Treescapes.

1.3 The Statement will demonstrate that the proposed development:

- Will provide new affordable homes in a sustainable location to meet local needs;
- Will not give rise to material harm to the residential amenity of existing nearby properties;
- Will enable the regeneration of a brownfield site;
- Will provide improvements to the appearance of the site; and
- Will create new local employment (during the construction phase).

1.4 Section 2 of this report describes the application site, while Section 3 describes the application proposal. Section 4 sets out the planning policy context, against which the application falls to be considered. Section 5 considers the planning matters

associated with the proposal. Finally, Section 6 provides a summary and our conclusions.

2.0 The application site

Site context

- 2.1 The application site extends to 0.24 ha and comprises of the former Royal Antediluvian Order of the Buffaloes (“R.A.O.B”) club, located to the north of Heol y Groes, Pencoed. The site falls within and at the edge of the district centre and settlement boundary of Pencoed as defined on the adopted Bridgend Local Plan (2013) proposals map. Although located within the centre, the site is sat back from Penybont Road, which provides the main road along which commercial activity is centred.
- 2.2 The site is occupied by the vacant R.A.O.B club, which occupies the northern section of the site with an expanse of hard surface car parking to the south and the west. An area of overgrown vegetation bounds the site to the north beyond which are residential properties and a rear access lane serving the units that front onto Penybont Road. To the east is a surface level car park, which serves the district centre and to the south the Pencoed Welfare Hall.
- 2.3 To the west is a public convenience block and a mixed-use development comprising commercial at ground floor with two floors of residential apartments above. The buildings largely screen the application site from the main commercial area with only a small element of the site in the southern tip being visible.
- 2.4 Access to the site for vehicles is taken from Heol y Groes to the south, whilst pedestrian access can be taken from the west between the public convenience block and the mixed use development.
- 2.5 In terms of the wider surrounding area, to the north and west are the commercial areas of the district centre. To the east and south are residential areas. Pencoed train station is located to the west of the site, approximately 200 m away. Bus stops are located on either side of Penybont Road, approximately 50m away.

- 2.6 The extent of the application site is shown on the red line site boundary plan (Dwg. No. 001-16) submitted with the application.

Planning history

- 2.7 Online records confirm that an application for two retail units, five town houses and eight apartments (Ref: P/10/791/FUL) on part of the site (western section) was approved with conditions on 9th March 2012.
- 2.8 More recently, an application for the conversion of the club into a hotel and restaurant (Ref: P/16/411/FUL) by the applicant was recommended for approval. However, due to delays in issuing a highways response, the funding for the proposal expired and the application was withdrawn.
- 2.9 In consideration of the above application, the Council required the applicant to enter into a legal agreement to ensure that the remaining unimplemented phases of planning permission P/10/791/FUL were revoked.

3.0 The proposal

- 3.1 The former R.A.O.B club has been vacant since 2015. The club was placed on the market after declining membership numbers rendered it surplus to requirements. The site was purchased by the applicant. Following withdrawal of an application for a hotel/restaurant on-site by the applicant, alternative redevelopment opportunities have been considered.
- 3.2 Following discussions with local social housing provider V2C, it has been decided to progress with a scheme which seeks to demolish the existing on-site buildings and redevelop the site to provide a total of 24 one bedroom apartments.
- 3.3 The proposed site layout indicates that a total of 25 car parking spaces will be provided to serve the existing Malt House and proposed development. The development is highly accessible by foot to the district centre and via public transport links.
- 3.4 V2C has identified the site as an ideal and sustainable development opportunity to provide much-needed new affordable homes for the local area.
- 3.5 The 24 units will provide apartments to meet the identified local needs. All of the affordable units will be offered by the housing association on a social-rented basis, where rent levels have regard to the Welsh Government's guideline rents and benchmark rents.
- 3.6 The proposed development is illustrated on the Proposed Site Plan (Dwg. No. S5), and further details are provided within the Design and Access Statement, submitted in support of the application.

4.0 Policy and other material considerations

4.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (“PCPA 2004”) requires that when making a determination on a planning application a local planning authority must make that determination in accordance with the development plan, unless material considerations indicate otherwise.

4.2 In this case, the Development Plan comprises the Bridgend County Borough Council Local Development Plan (adopted 2013) (“LDP”). We first turn to consider the development plan before reviewing other material considerations.

Bridgend County Borough Council Local Development Plan (adopted 2013)

4.3 The Local Plan was adopted in 2013 and therefore represents the most recent expression of the Council’s strategy for the Pencoed area for the period up to 2021.

4.4 The application site falls within the settlement boundary of Pencoed as defined on the Proposals Map and by Policy PLA1. Policy PLA1 states that development will be permitted within the defined settlement boundaries at a scale commensurate with the role and function of settlements. Pencoed is identified as a “main settlement”.

4.5 In terms of design, Policy SP2 states that all development should contribute to creating high quality attractive, sustainable places which enhance the community in which they are located, whilst having full regard to the natural, historic and built environment by:

- “1) Complying with all relevant national policy and guidance where appropriate;*
- 2) Having a design of the highest quality possible, whilst respecting and enhancing local character and distinctiveness and landscape character;*
- 3) Being of an appropriate scale, size and prominence;*
- 4) Using land efficiently by: (i) being of a density which maximises the development potential of the land whilst respecting that of the surrounding development; and (ii) having a preference for development on previously*

developed land over greenfield land;

- 5) *Providing for an appropriate mix of land uses;*
- 6) *Having good walking, cycling, public transport and road connections within and outside the site to ensure efficient access;*
- 7) *Minimising opportunities for crime to be generated or increased;*
- 8) *Avoiding or minimising noise, air, soil and water pollution;*
- 9) *Incorporating methods to ensure the site is free from contamination (including invasive species);*
- 10) *Safeguarding and enhancing biodiversity and green infrastructure;*
- 11) *Ensuring equality of access by all;*
- 12) *Ensuring that the viability and amenity of neighbouring uses and their users/occupiers will not be adversely affected;*
- 13) *Incorporating appropriate arrangements for the disposal of foul sewage, waste and water;*
- 14) *Make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change; and*
- 15) *Appropriately contributing towards local, physical, social and community infrastructure which is affected by the development”.*

4.6 In terms of parking standards Policy PLA11 requires that all development will be required to provide appropriate levels of parking and that it should be in accordance with adopted parking standards.

4.7 In respect of nature conservation, Policy EVN6 states that proposals for development or redevelopment will be required to retain, conserve, restore and enhance wherever possible woodland; trees; hedgerows etc. Where this is not possible mitigation measures will be required. Proposals must avoid or overcome harm to nature conservation assets and/or species of wildlife.

4.8 With regard to waste management, Policy ENV15 requires proposals for new built development to include provision for the proper design, location, storage and management of waste generated by the development both during construction and operation of the site.

- 4.9 Policy SP10 identifies Pencoed as a district centre. The policy states that all new development within retailing and commercial centres should provide retail, community or commercial floorspace on the ground floor.
- 4.10 Policy COM3 encourages the reuse of buildings or land for new residential developments within settlement boundaries where no other LDP policy protects the building or land for an existing or alternative use.
- 4.11 With regard to housing density, Policy COM4 states that proposals for residential development on sites exceeding 0.15ha should provide a net residential density minimum of 35 dwellings per hectare. A lower density may be acceptable subject to design or site constraints or where it can be demonstrated there is a lack of choice of housing type within a local community.
- 4.12 In terms of affordable housing, Policy COM5 states that the provision of at least 20% affordable housing will be sought on sites capable of accommodating 5 units or more or exceeding 0.15ha in Pencoed.
- 4.13 Policy SP14 states that planning obligations may be sought in respect of, inter alia, affordable housing; physical infrastructure works; open space; educational facilities and public transport facilities and services.

Other material considerations

Supplementary Planning Guidance (SPG)

- 4.14 SPG 8: “Residential Development” (adopted 2008) sets out to improve the standard of design in residential development. The guidance sets out key design objectives for all new residential development to adhere to. The objectives state that development should be designed to integrated with, protect and enhance the landscape and biodiversity uses of the site; should use land efficiently; create layouts that are accessible to all in society; create layouts that are legible; should respond to the character and local distinctiveness; should provide natural surveillance; ensure high quality; where possible provide a mix of uses and choice in

types of property; buildings and spaces should be flexible and adaptable and buildings and landscape should minimise resource use in their construction, operation and maintenance.

- 4.15 SPG 13: “Affordable Housing” (adopted 2015) reconfirms the affordable housing requirements as set out within Policy COM5. Further, it states that it is the LPA’s preference for a Registered Social Landlord (RSL) to be involved in the development and management of affordable housing to ensure that the units remain affordable in perpetuity, and that affordable units for social rent should comply with the Welsh Government’s Development Quality Requirements.
- 4.16 SPG 17: “Parking Standards” (adopted 2011) states that car parking should be provided in line with maximum requirements of 1 space per bedroom (max of 3) per house/apartment, and 1 visitor space per 5 units.

National policy

- 4.17 National planning policy for Wales is set out in Planning Policy Wales (“PPW”) Edition 10 (December, 2018) with supporting technical information provided in Technical Advice Notes (“TAN”). Technical guidance on “Joint Housing Land Availability Studies” is provided in TAN 1 (2015) and guidance on “Planning and Affordable Housing” is provided in TAN 2 (2006). Technical guidance on design is provided in TAN 12 (2016).
- 4.18 At the heart of PPW is a presumption in favour of sustainable development. Paragraph 1.17 confirms that Legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise.
- 4.19 The reuse of previously developed (or brownfield) land is encouraged wherever possible in preference to greenfield sites. Many previously developed sites in built-up areas are considered suitable for development because their re-use will promote sustainability objectives. This includes sites in and around existing settlements

where there is vacant or under-used land.

- 4.20 Chapter 4 of PPW titled “Active and Social Places” provides specific guidance in relation to housing. Paragraph 4.2.1 states that LPAs must understand all aspects of the housing market in their areas, which will include the requirement, supply and delivery of housing.
- 4.21 Paragraph 4.2.2 states that the planning system must identify a supply of land to support the delivery of the housing requirement to meet the differing needs of communities; it should enable the provision of a range of well designed, energy efficient, good quality market and affordable housing; and focus on the delivery of the identified housing requirement and the related land supply.
- 4.22 Paragraph 4.2.15 emphasises that LPAs must “...ensure that sufficient land is genuinely available or will become available to provide a 5 year supply of land for housing....”
- 4.23 Paragraph 4.2.17 recognises the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites. For example, sites and allocations which are no longer likely to be needed for office, industrial or retail purposes may be appropriate locations for housing.
- 4.24 Paragraph 4.2.25 states that a community’s need for affordable housing is a material planning consideration.
- 4.25 TAN 1: Joint Housing Land Availability Studies (2015) places an emphasis on the requirement for Local Authorities to maintain a five-year supply of readily available housing land suitable for development.
- 4.26 TAN 2: Planning and Affordable Housing (2006) identifies key areas where local planning authorities, housing authorities, RSLs and private developers should work together, such as:

- identifying potential sites for affordable housing (including windfall sites; and
- establishing an appropriate mix of housing types and tenures which will contribute to the identified need for affordable housing and to the objective of achieving mixed and sustainable communities.

4.27 TAN 2 also states that local authorities need to consider the relationship between the overall household requirements identified through the LHMA and the broad balance of housing proposed. In particular, whether the size and tenure of affordable housing proposed reflects the housing requirements identified.

4.28 TAN 12: Design (2016) provides advice on design considerations and, in relation to housing design, it states that local planning policies and guidance should aim to:

- create places with the needs of people in mind, which are distinctive and respect local character;
- promote layouts and design features which encourage community safety and accessibility;
- focus on the quality of the places and living environments for pedestrians rather than the movement and parking of vehicles;
- avoid inflexible planning standards and encourage layouts which
- manage vehicle speeds through the geometry of the road and building;
- promote environmental sustainability features, such as energy efficiency,
- in new housing and make clear specific commitments to carbon
- reductions and/or sustainable building standards;
- secure the most efficient use of land including appropriate densities; and
- consider and balance potential conflicts between these criteria.

Planning policy conclusions

4.29 When assessed against the aims and objectives of the development plan and other material considerations, the application proposal is considered to be fully compliant.

4.30 We assess the proposals in the following section.

5.0 Planning Assessment

- 5.1 The application proposal must be determined in a manner prescribed under Section 38(6) of the Planning and Compulsory Purchase Act 2004 (“PCPA 2004”), which requires that when making a determination on a planning application a local planning authority must make that determination in accordance with the development plan, unless material considerations indicate otherwise.

The development plan

Principle of development

- 5.2 The site falls within the settlement boundary of Pencoed, where under Policy PLA1 development will be permitted at a scale commensurate with the role and function of settlements. Pencoed is defined as a “main settlement” where new housing is accepted in principle. The principle of redevelopment of the site for housing is acceptable subject to detailed matters, which are considered in turn below.

Affordable housing

- 5.3 The application proposal is for affordable housing, to be provided by an established affordable housing provider, on a vacant brownfield site in a sustainable location that is well integrated with existing residential development.
- 5.4 In order to assess historic housing need, current need and newly arising need in the context of affordable housing supply, the most recent Local Housing Market Assessment 2016-2018 Draft Consultation (“LHMA”) found that the estimated annual requirement for affordable housing in the Borough is 292 units per year. In particular, there is strong demand for smaller one and two bedroom properties.
- 5.5 The delivery of affordable housing is a priority both of the Welsh Government and Bridgend County Borough Council. The application proposal to deliver a 100% affordable housing scheme, of which all units will be social rented, is compliant fully

with planning policy COM5 and will make a valuable contribution to meeting the identified need for affordable housing.

- 5.6 The proposed provision would make a valuable contribution towards the provision identified in the LHMA and this factor should weigh heavily in favour of the proposal in planning policy terms.

Residential development within a district centre

- 5.7 Policy SP10 indicates that new development proposals within a retailing and commercial centre should provide retail, community or commercial floorspace at ground floor.
- 5.8 As set out in Section 2, part of the site is screened from Penybont Road by existing buildings, which form part of the wider site and already incorporate retail at ground floor, leaving only a small area of the site visible from Penybont Road. The visible area is set well back from Penybont Road with an area of green public open space forming a natural barrier to it.
- 5.9 The Policy has been considered in the design evolution and discussed with local members and the town council.
- 5.10 In the current economic climate, unless development opportunities provide a retailer with an optimum pitch there is simply no demand. A specialist retail agent has advised that under such circumstances the site is poorly located to attract any retailer interest. A copy of the letter is provided at **Appendix 1**.
- 5.11 As such, whilst the proposal is not in accordance with Policy SP10, the proposal must be assessed against the development plan as whole. In that regard, the proposal is compliant with the need to provide more housing and specifically affordable housing such as that proposed.

Design

- 5.12 In dealing with design considerations, Policy SP2 states that all development should contribute to creating high quality, attractive, sustainable places which enhance the community by respecting and enhancing local character; being of an appropriate scale and size; using land efficiently; developing previously developed land etc.
- 5.13 It is considered that the proposed development is compliant with the requirements of Policy SP2. The design and layout has been considered carefully and complements the character of the surrounding area and ensures that there will be no negative impacts on neighbouring properties. The density is appropriate and the proposals seeks to re-use a vacant brownfield site, which is no longer fit for purpose, which accords with Policy COM3.

Highways and parking

- 5.14 A Transport Statement is submitted in support of the application demonstrating that the proposal is entirely acceptable in highways terms. The proposal is compliant therefore with Policy SP3 in respect of transport planning.
- 5.15 With regards to parking, 25 dedicated spaces are provided on-site to serve the existing Malt House requirements and provide for the new development. Given the social rented nature of the development, and the excellent public transport links to the wider area, this is considered to be an acceptable level of provision. The proposal is compliant therefore with Policy PLA11 in respect of car parking.

Ecology

- 5.16 In respect of ecology the Preliminary Roost Assessment found that the proposal would not impact upon statutory and non-statutory sites within the vicinity of the application site. The Assessment concluded that the proposal would unlikely give rise to any negative impact on bat populations. Further, the Assessment concluded that there may be a negative impact on nesting birds as a result of the proposal.

However, the Assessment has recommended measures to ensure that any potential impact is mitigated. The proposal is compliant with Policy ENV6.

Amenity

- 5.17 The proposed site plan makes a provision for external amenity areas, which in the context of the urban location is considered appropriate. Notwithstanding, the site is highly accessible by foot to a number of public open areas. These include areas of amenity around Pencoed leisure centre approximately 300 m to the south of the site, land to the north of Coed Y Craig approximately 250 m to the west of the site and land at Llwyn Gwern approximately 650 m to the south west of the site.

Other material considerations

Housing land supply

- 5.18 The latest Bridgend County Borough Council Joint Housing Land Availability Study (JHLAS) for 2019, which presents the housing land supply for the area at the base date of 1st April 2019, concludes that Bridgend is only able to demonstrate 2.9 years housing land supply, based on the prescribed residual method. The provisions of PPW and TAN 1, as discussed in the planning policy section, require that Local Authorities must be able to demonstrate that they have a five year supply of land readily available and suitable for development of housing. Where this can not be demonstrated, the need to increase housing land supply should be given weight in the determination of planning applications, provided that all other material considerations are adequately satisfied.
- 5.19 The application proposal represents a sustainable windfall opportunity and will assist the LPA in meeting the identified shortfall in housing land supply, this factor should weigh heavily in favour of the proposal.

Ground conditions and coal mining

- 5.20 The Investigation report concludes that there are contaminants on-site. However, these can be mitigated through the implementation of a suitable remediation strategy for the site, to ensure it is suitable for residential use.
- 5.21 In respect of Coal Mining the report confirms that the site does not fall within a surface area that could be affected by past underground mining. There are no records of mine entries within 20m of the site boundaries. It is considered therefore that there is a low risk from past mining activities.

Jobs and investment

- 5.22 The application proposal will create valuable employment during the construction phase of the proposed development. The importance of supporting local jobs is a common thread of national and local planning policy.
- 5.23 The application proposal will also regenerate a vacant site and will enable significant investment in the local area.

Planning obligations

- 5.24 The proposal is for a 100% affordable housing scheme at the application site, the delivery and operation of which can be secured by way of an appropriately worded legal agreement.

6.0 Conclusions

6.1 This Statement has demonstrated that the application proposal is compliant fully with the aims and objectives of both the development plan and other material considerations. In particular, the development proposal:

- Will provide new high quality affordable homes in a sustainable location to meet identified local need;
- Will enable the regeneration of an accessible, vacant brownfield site and provide significant improvements to the appearance of the site and local area;
- Will not have any significant impacts on neighbour amenity or the visual amenity of the area; and
- Will create valuable local employment opportunities during the construction phase.

6.2 The present planning policy context in Bridgend County Borough Council, namely the lack of housing land supply and affordable housing need are further compelling material planning considerations that weigh in favour of granting planning permission for the proposal.