



Ms A Borge
LDP Programme Officer
Bridgend County Borough Council

Date: 10 February 2023

Our Ref: JA M17/0713-20

By Email Only:
LDPProgrammeofficer@bridgend.gov.uk

Dear Ms Borge

RE: BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033) EXAMINATION

HEARING SESSION 6 - GOOD DESIGN AND SUSTAINABLE PLACEMAKING –
SUSTAINABLE TRANSPORT AND ACCESSIBILITY

RESPONDENT NUMBER 874 – TETLOW KING PLANNING ON BEHALF OF MULLBERRY
HOMES LTD

Thank you for sending me the Planning Inspector's invitation to Tetlow King Planning to participate at the Bridgend LDP Examination.

I am pleased to provide answers to the Inspector's questions for matter 6 below. I respond to the specific questions that are relevant to our previous representation to the Deposit LDP consultation.

Inspector's question 4 - Should Policy PLA12 be amended to recognise the potential for enabling development to take place to fund the delivery of the active travel network?

Bridgend County Borough Council (BCBC) responded to our request that Policy PLA12 should be amended to support enabling development to deliver the sought active travel network in its 'SD20 Deposit Consultation Report Appendix Volume 16 – Developers and Landowners Consultation Responses' (Page 102, respondent 874). BCBC states:

"The wording of Policy PLA12 prioritises the provision of active travel measures within development proposals and places the emphasis on developers to implement appropriate measures in accordance with the Council's Active Travel Network Map and the Active Travel (Wales) Act 2013. The supporting text (para 5.2.79) goes on to clearly state that PLA12 "...supports new developments that incorporate well-designed safe features and facilities that will be accessible to all people to walk and cycle for everyday journeys..." Paragraph 5.2.82 elaborates further by stating that priority will be given to proposals that incorporate walking and cycling and Paragraph 5.2.84 emphasises the importance of incorporating the measures described in Policy PLA12 in the delivery of any strategic site or any proposal. It also describes the means of securing such infrastructure through the planning system.

If anything, the changes proposed would reduce the emphasis on all development proposes needing to maximise walking and cycling. Therefore, the change is not considered necessary."

I disagree with the Council. I consider that Policy PLA12 should specifically support development at sites that will enable the delivery of the sought active travel network.

As an example, I refer to the site at land off Waunscil Avenue, Bridgend. We referred to this site in our previous representation to the Deposit LDP. We are agents for a planning appeal that has recently been submitted to the Welsh Assembly (but is not yet validated).

During previous planning appeals, Inspectors have considered and found acceptable the combination of residential proposals and the Council's aspirations for public open space and a community route at the site. The location of open space and the route of the community route (a walking and cycling route) was considered acceptable in earlier schemes.

For example, in the 2005 appeal (APP/F6915/A/05/1180711), the Inspector found that the site's development for both housing and the community route would provide an opportunity for a significant section of the community route to be provided.

The Inspector stated in paragraphs 16 and 17 that: *"Such a route would be of particular benefit to local residents, some of whom currently traverse the route despite its gradient, its overgrown and muddy state, and the absence of lighting or natural surveillance. Thus, I consider that in relation to the desire to promote public open space and play area provision and to achieve cycle and community routes, the envisaged development has the potential of meeting the aims of the Council's development plan."*

Similarly in the 2010 appeal (APP/F6915/A/08/2080480/WF) the Inspector considered that the proposed landscaping, community route and new access points would *"significantly improve the provision of public open space in the area."* (Paragraph 10). The Inspector added that the proposal presented a realistic opportunity to achieve the provision of public open space as part of the development.

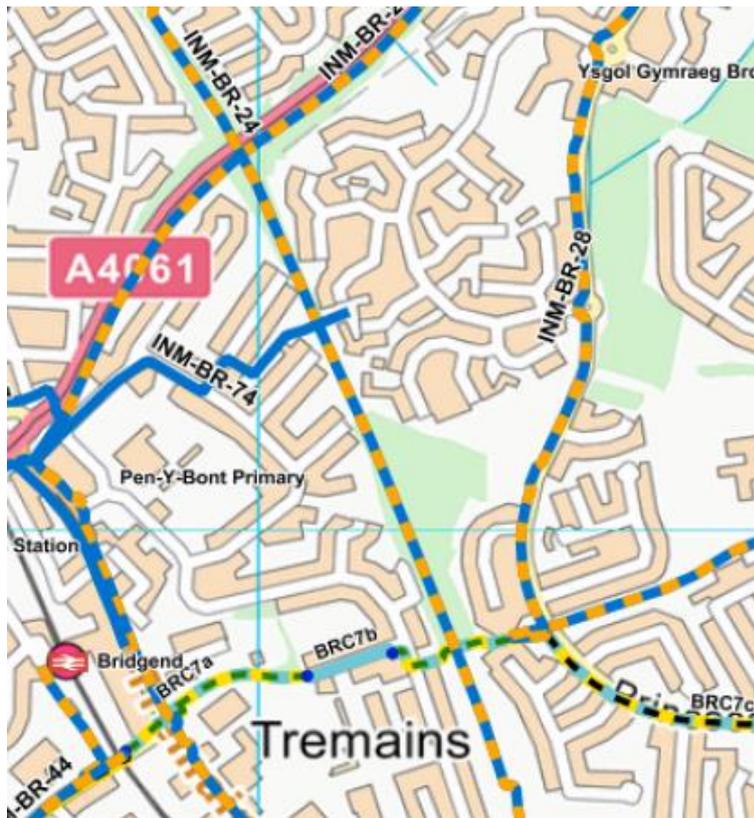
Again, in the 2011 appeal (APP/F6915/A/11/2154074), the Inspector recognised *"the benefits of the scheme in terms of the use of derelict, brownfield land to provide a sustainable development of housing and the associated community route and public open space"* which he made clear were *"in accordance with development plan policies."*

Draft Policies SP5 and PLA12 relate to active travel. BCBC has produced Active Travel Network Maps that set out detailed plans for a network of active travel routes and facilities in the County Borough. They identify the walking and cycling routes required to create fully integrated networks for walking and cycling to access work, education, services and facilities.

We therefore welcome that the Integrated Network Map identifies the route through our client's site as a future route proposal for an active travel route, between Wildmill Railway Station and Brackla Residential Area (INM-BR-24). This is shown at Figure 1.

Our proposals will also incorporate existing route INM-BR-74, which seeks an 'enhanced route through dropped kerb provision, and re-surfacing/enhanced lighting from Charles Street to Clos-y-Waun', also shown at Figure 1. This is identified as a short-term aim.

Figure 1 – Route INM-BR-24 and INM-BR-74 on Integrated Network Map 15



Source: BCBC

Draft Strategic Policy SP3 seeks to maximise opportunities for active travel and increased public transport use and promote connections within and outside the site to ensure efficient and equality of access for all. Similarly, draft Policy SP5 is worded to enhance and expand the active travel networks identified in the Council's Existing Routes Map and Active Travel Network Maps, including links to those networks as a means of improving connectivity. We welcome these policies and their wording.

The active travel policy itself, draft Policy PLA12 states that:

“Development must maximise walking and cycling access by prioritising the provision within the site, and providing or making financial contributions towards the delivery offsite, of the following measures as appropriate...

...2) Delivery of proposals identified within the Council's Active Travel Network Map;

3) Improvements, connections, and/or extensions to:

a) Routes and proposals identified on the Existing Routes Map and Active Travel Network Map...”

The supporting text at paragraph 5.2.81 states that *“opportunities should be maximised to further improve upon these routes, providing walking connections which will allow integration between new developments and existing communities.”*

We welcome the wording in draft Policy PLA12 and consider it important that the policy's wording maximises provision of the delivery of the Active Travel Network Map where possible, as our proposal would do.

We also consider that the policy should go further and specifically encourage supporting development that will help to enable the active travel network. It should also recognise that encouraging enabling development will allow the network to be developed without needing public funds to support it, ensuring quicker delivery of the Network.

Therefore, the first part of Policy PLA12 should read:

“Development proposals that maximise walking and cycling access will be supported including any associated development (such as housing) that helps to enable the provision of Active Travel routes. They will be particularly supported where they enable delivery without recourse to public funding.

Development proposals must prioritise the provision within the site, and/or provide or make ~~Development must maximise walking and cycling access by prioritising the provision within the site, and providing or making~~ financial contributions towards the delivery offsite, of the following measures as appropriate...”

Yours sincerely



JONATHAN ADAMS
SENIOR DIRECTOR
For and On Behalf Of
TETLOW KING PLANNING

jonathan.adams@tetlow-king.co.uk

Encs.