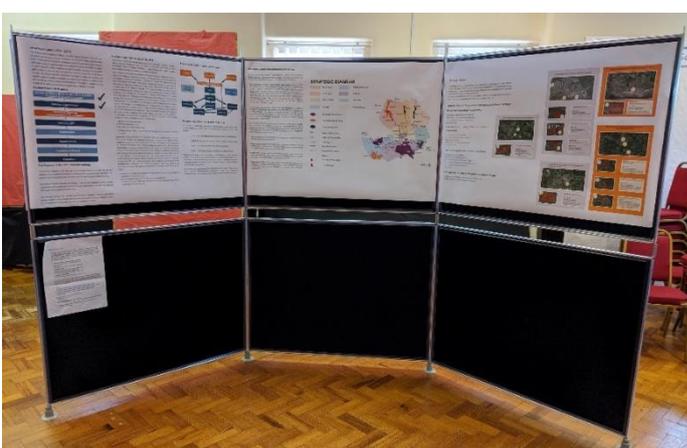


Bridgend Replacement Local Development Plan 2018-2033



Initial Consultation Report, 2020
(Preferred Strategy Consultation)

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1. Introduction

- 1.1 An up-to-date Local Development Plan (LDP) is an essential part of a plan-led planning system in Wales. The existing LDP (adopted on 18th September 2013) sets out the priorities and objectives of the Corporate Plan in land-use terms, although the housing land supply has now fallen below the 5 year minimum requirement within the County Borough. The Council is statutorily required, under Section 69 of the Planning and Compulsory Purchase Act 2004, to undertake a full review of the adopted LDP at intervals not longer than every 4 years from the date of adoption. As such, a full review of the adopted LDP was triggered in September 2017. The Review Report recognised an urgent need to address the shortfall in the housing land supply by identifying additional housing sites, whilst recognising other significant contextual changes in circumstances and policy at a national, regional and local level. A Replacement LDP is therefore now being prepared and will express, in land-use terms, the wellbeing objectives and priorities of the Bridgend Public Services Board's Well-being Plan.
- 1.2 Regulation 15 of the LDP Regulations requires the Council to publish its pre-deposit proposals (Preferred Strategy) for public inspection and consultation before finally determining the content of its LDP for Deposit. The Preferred Strategy was published in September 2019, representing the completion of a period of pre-deposit plan preparation and engagement, which has clearly influenced its development. The Preferred Strategy provides the strategic context for the preparation of more detailed policies, proposals and land use allocations that will subsequently be included in the Deposit LDP. It ultimately identifies the type and scale of spatial change required to achieve the proposed new LDP Vision and Objectives.
- 1.3 The Vision of the Replacement LDP is focused on the continued transformation of Bridgend County Borough into an interrelated network of safe, healthy and inclusive communities that connect more widely with the region to catalyse sustainable economic growth. This is to be achieved by maintaining and developing strong, interdependent, cohesive settlements whilst protecting and enhancing the County Borough's environmental and heritage assets. The LDP Vision shall be delivered through four Strategic Objectives, which have been defined to reflect the key issues facing the County Borough, align with national policy and ensure an appropriate balance between the different elements of sustainability. They are cross-cutting in their nature and also cross-reference the goals and objectives of the Well-being of Future Generations (Wales) Act 2015 and Bridgend Local Well-being Plan (LWBP):

- **SOBJ1: To Create High Quality Sustainable Places (Placemaking)**
- **SOBJ2: To Create Active, Healthy, Cohesive and Social Communities**
- **SOBJ3: To Create Productive and Enterprising Places**
- **SOBJ4: To Protect and Enhance Distinctive and Natural Places**

1.4 The Preferred Strategy statutory consultation period took place between 30th September 2019 and 8th November 2019, in accordance with the timescales outlined in the Community Involvement Scheme (CIS).

1.5 This Consultation Report has subsequently been prepared to outline how Bridgend County Borough Council has undertaken public participation and consultation on the Preferred Strategy itself, thereby fulfilling LDP Regulation 16a. The Report identifies the steps taken to publicise plan preparation, in accordance with the CIS, before outlining the specific bodies engaged, summarising the main issues raised and identifying how the responses have been or will be addressed. The Report provides significant detail on how this key period of consultation will influence development of the Deposit LDP.

2. Consultation Methods

2.1 One of the key aims of the Replacement LDP is to ensure plan production is based on effective community involvement. This is to ensure a range of views can be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were utilised at Preferred Strategy stage to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods will now be outlined in turn.

Local Advertisement

2.2 A Notice of Pre-deposit Public Consultation (see Figure 1 overleaf) was placed in the Glamorgan GEM on Thursday 26th September 2019, which was the week before the start of the consultation period. The Notice stated where the Preferred Strategy, initial Sustainability Appraisal Report (including the Environmental Report) and the background documents could be viewed along with details of how and when representations could be made. A follow-up notice was also placed in the Glamorgan GEM during the first week of consultation (3rd October 2019) for completeness.

Figure 1: Notice of Pre-deposit Public Consultation, Glamorgan GEM

FOR ALL THE LATEST LOCAL NEWS VISIT
www.glamorgan-gem.co.uk



BRIDGEND COUNTY BOROUGH COUNCIL
CYNGOR BWRDEISTREF SIROL PEN-YBONT
AR OGWR

Deddf Cynllunio a Phrynu Gorfodol 2004
Rheoliadau Asesiadau Amgylcheddol o Gynlluniau a Rhaglenni (Cymru) 2004
Rheoliadau Cynllunio Gwlad a Thref (Cynllun Datblygu Lleol) (Cymru)
Rheoliadau 2005 (Rheoliad 15)
Hysbysiad o Ymgynghoriad Cyhoeddus Cyn Adnewo ar gyfer Cynllun Datblygu Lleol
Newydd (2018 – 2033)

Mae Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr wedi paratoi dogfenau cynigion cyn adnewo ar gyfer y cynllun uchod. Ar ôl iddo gael ei labwysiadu, bydd y Cynllun Datblygu Lleol yn disodli'r cynllun datblygu presennol ac yn sail i benderfyniadau ynghylch cynllunio defnydd tir ar gyfer Bwrdeistref Sirol Pen-y-bont ar Ogwr.

Mae'r dogfenau cynigion cyn adnewo yn amlinellu gwledigaeth, dewisiadau strategol, y strategaeth a ffeir a pholisiau allweddol yr Awdurdod, ac maent yn cynnwys gwybodaeth gefndirol allweddol ac adroddiad cychwynnol yr arfarniad o gynllunio (sy'n cynnwys yr adroddiad amgylcheddol).

Mae'r dogfenau Strategaeth a Ffeir a gwybodaeth gefndirol ar gael i'w gweld ar wefan y Cyngor. Mae copiau hefyd ar gael i'w harchwilio yn ystod oriau agor arferol yn Swyddfeydd Dinesig y Cyngor, Stryd yr Angel, Pen-y-bont ar Ogwr a phob llyfrgell gyhoeddus yn y Fwrdeistref Sirol yn ystod oriau agor arferol y gellir cael manylion amdanant ar wefan y Cyngor, neu drwy gysylltu â'r llyfrgell berthnasol.

Y dyddiad cau ar gyfer cynllunio sylwadau ar Strategaeth a Ffeir ar gyfer Cynllun Datblygu Lleol Pen-y-bont ar Ogwr yw 5pm ar 8 Tachwedd 2019.

Cyflwynwch unrhyw sylwadau ar y ddogfen hon drwy yn ysgrifenedig drwy e-bost neu drwy'r post (gan ddefnyddio'r Ffurflen Sylwadau safonol ar gael ar-lein) fel a ganlyn:

Ewch i <https://www.bridgend.gov.uk/>
 Anfonwch Gopi o'r Ffurflen Ymgynghoriad mewn e-bost i LDP@bridgend.gov.uk
 Postwch Gopi o'r Ffurflen Sylwadau i: Cynllunio Datblygu, Swyddfeydd Dinesig, Stryd yr Angel, Pen-y-bont ar Ogwr, CF31 4WB

Nodwch fod yr ymgynghoriad hwn yn ymwneud â materion a phynciau a drafodir yn y Strategaeth a Ffeir ac nid yw'n hysbysu'r ddiwedd pob Adran o'r Strategaeth a Ffeir, sydd wedi eu cynllunio i'ch cynorthwyo chi gyda'ch sylwadau. Bydd sylwadau a weir yn briodol, ac a gyflwynir yn gywir o fewn y cyfnod ymgynghoriad penodedig, yn cael eu cydnabod a'u hadrodd mewn modd priodol fel y gall y Cyngor eu hystyried.

Gellir cyflwyno cais gyda'r sylwadau i chi gael eich hystyried ynghylch cam nesaf y Cynllun Datblygu Lleol a/neu fod y Cynllun Datblygu Lleol wedi ei gyflwyno i Lywodraeth Cynulliad Cymru er mwyn cael archwiliad amhysbysol a/neu fod y cynllun wedi ei labwysiadu.

Dim oherwydd a gyflwynir yn unol â'r hysbysiad hwn y mae'n ofynnol i'r Awdurdod eu hystyried. Ni chaiff sylwadau a weir adeg y cam cyn adnewo presennol eu hystyried gan yr Arolygydd a benodwyd i gynnal yr Archwiliad Amhysbysol. Bydd cyfle arall i gyflwyno sylwadau adeg y cam adnewo a bydd y sylwadau hyn yn cael eu hystyried yn ystod yr archwiliad.

Mae rhagor o wybodaeth am broses y Cynllun Datblygu Lleol a dogfenau cefndir perthnasol ar gael ar wefan y Cyngor <https://www.bridgend.gov.uk/cynllunio> neu **Flonich y Tim Datblygu Cynllunio ar 01656 643169 i gael rhagor o wybodaeth.**

Richard Matthams, Rheolwr Cynllunio Datblygu.

Planning and Compulsory Purchase Act 2004
The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004
The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005
(Regulation 15)
Notice of Pre-deposit Public Consultation for a Replacement Local Development Plan
(2018 – 2033)

Bridgend County Borough Council has prepared pre-deposit proposals documents for the above plan. The Replacement Local Development Plan (LDP) will, upon adoption, replace the current development plan and be the basis for decisions on land use planning for Bridgend County Borough.

The pre-deposit proposals documents outline the Authority's vision, strategic options, preferred strategy and key policies, and include key background information and an initial sustainability appraisal report (which includes the environmental report).

The Preferred Strategy and background documents are available to view on the Council's website.

Copies are also available for inspection during normal opening hours at the Council Civic Offices, Angel Street, Bridgend and all public libraries in the County Borough during their normal opening hours, details of which can either be obtained from the Council's website, or by contacting the relevant library.

The closing date for the submission of comments on the Bridgend LDP Preferred Strategy is 5pm on 8th November 2019.

Please submit any comments on this document to us in writing by email or post (using the standard Comment Form available online) as follows:

Visit <https://www.bridgend.gov.uk/> Email a Copy of the Consultation Form to LDP@bridgend.gov.uk
 Post a Copy of the Comment Form to **Development Planning, Civic Offices, Angel Street, Bridgend, CF31 4WB**

Please note that this consultation relates to issues and topics discussed in the Preferred Strategy and is not an opportunity to make detailed comments on individual Candidate Sites. All comments should relate to the questions included at the end of each Section of the Preferred Strategy, which are designed to assist with your representation.

Representations which are properly made, and duly submitted within the specified consultation period, will be acknowledged and reported in an appropriate manner to Council for its consideration.

Representations may be accompanied by a request to be notified of the next stage of the LDP and/or that the LDP has been submitted to the Welsh Assembly Government for independent examination and/or of the adoption of the plan.

The Authority is only required to consider representations made in accordance with this notice. Representations made at the current pre-deposit stage will not be considered by the Inspector appointed to carry out the Independent Examination. There will be a further opportunity for representations to be made at the deposit stage and these representations will be considered at the examination.

Further information on the LDP process and relevant background documents are available on the Council's web site at www.bridgend.gov.uk/planning or **Telephone the Development Planning Team on 01656 643169 for further information.**

Richard Matthams, Development Planning Manager.

Success for Wick Group of Artists' autumn exhibition



Some of the artwork being showcased at the autumn exhibition.

WICK Group of Artists this year held an autumn exhibition as part of a festival of art and craft events across the Vale, supported by Cowbridge Community College.

A spokesman said: "It was good to be part of this wider festival, although as it turned out to be the last lovely, warm weekend of the summer visitor numbers and sales were down somewhat on previous years."

The group, includes artists who

attend the Wednesday art class in Wick as well as the Thursday group, worked together to put on the exhibition.

This year there were several new artists and about 18 in total exhibited.

Paintings varied from being small, very detailed pieces, to much larger, some oil, pastel and watercolour as well as acrylic and pencil.

Wick Village Hall was filled with more than 80 beautifully displayed paintings and guests were able to watch several artists

getting on with their paintings.

The spokesman added: "It was good to see some of our regular visitors as well as new faces, and to see everyone enjoying the event, catching up with friends and even buying a picture or two."

"About 100 people visited over the two days and all proceeds of our admission fee and a percentage of other sales, means we can give a useful donation to both the village hall and the local church. Thank you to all who supported us."

LD

'Walk to School, improve your health and save the planet'

A GENERATION ago, 70 per cent of children walked to school. Now, it's less than half.

The Living Streets charity is looking to reverse this trend with their Walk to School campaign this October for primary and secondary school children.

Walking to school has many clear benefits, from improved attentiveness in the classroom, through to less traffic and pollution on our roads.

During morning peak traffic times, one in five cars on the road are taking children to school and two in five parents of primary school children are worried

about pollution levels around their children's schools.

Ogmore MP Chris Elmore said: "There are so many reasons to take part in Walk to School – from improving our children's physical and mental health through daily exercise, to doing our bit to reduce carbon emissions to help protect our health and our planet."

"We have all read about the dangers posed by the 'climate emergency' and should remember that small steps like this really can make a big difference. The benefits are clear, and I'd urge mums and dads across Ogmore to get involved and Walk to School this October."

What's on at the theatre?

Spanish Lies in Bridgend

TICKETS are now on sale for Phoenix Theatre's latest production of Frank Vickery's comedy

Spanish Lies on October 11 and 12, when once again proceeds will support The Sandville.

Hoping to revive their flagging marriage and celebrate 25 years together, Dougie takes Lorna back to their honeymoon hotel in Majorca and we eavesdrop on earlier decisions with the knowledge of what happens later...

Tickets are available from The Phoenix Ticket Line on 01656 783647 or 07890546311 or the Grand Pavilion box office on 01656 815995 or www.grandpavilion.co.uk.

Welsh Dragons in modern classic TAKING Flight Theatre Company will

be taking a family show

You've Got Dragons to theatres across the UK

British Sign Language and audio description.

The show is suitable for young children, schools and families, and is fully accessible to those with a D/deaf, hard of hearing, blind or visually impaired member.

The show will take place at Blaengarw Workman's Hall on October 28.

Call 01656 815995 or visit www.awen-wales.com/blaengarw-workmens-hall Blaengarw Workmens Hall and Salisbury Playhouse.

Council Web Site and Public Inspection

- 2.3 The package of consultation documents was made available online via Bridgend County Borough Council's Website (www.bridgend.gov.uk); including direct links from both the 'Consultations' and 'Development Planning' pages. A single index-linked PDF containing all background papers was provided via the Consultation Page for ease of reference. A screenshot of the Consultation Page is provided in Figure 2 below.

Figure 2: Preferred Strategy Consultation Page, Council Website

The screenshot shows the website for Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr (Bridgend County Borough Council). The page is titled 'Replacement local development plan strategy consultation'. It features a navigation menu with 'Residents', 'Business', 'My Council', and 'Visit us'. The main content area includes a breadcrumb trail: 'Residents > Planning and building control > Development planning > Replacement Bridgend Local Development Plan 2018 to 2033 > Replacement Local Development Plan current consultations > Replacement local development plan strategy consultation'. The main heading is 'Replacement local development plan strategy consultation'. Below this, there is a section titled 'We are consulting on our Replacement Local Development Plan Preferred Strategy.' followed by a paragraph of text. Another section is titled 'This consultation's position in the process of replacing the LDP' with a paragraph of text. A third section is titled 'Comment on the preferred strategy' and contains a call to action: 'The deadline for commenting on the Bridgend LDP preferred strategy is 5pm on 8 November 2019.' On the right side, there are sections for 'Related links' and 'Documents', each with a list of links.

- 2.4 A facility was made available for respondents to complete an electronic response template and submit this form by email (to ldp@bridgend.gov.uk) in order to make representations. Respondents were also provided with the option to print the response form for completion by hand and submission by post if preferred.
- 2.5 In addition to this online presence, bilingual printed reference copies of the Preferred Strategy were placed within public facing Council buildings, including

every library in the County Borough (fixed and mobile) as well as the Customer Service Centre at the Council's Civic Offices in Angel Street, Bridgend. These documents were available to view during the usual opening hours. Bilingual hard copies of the response forms were also made available alongside the Preferred Strategy documents for members of the public to complete and submit by post in addition to online signposting.

LDP Consultation Database Dissemination

2.6 Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Preferred Strategy Consultation. In total, 354 representors were contacted, provided with details of how to access the package of consultation documents and told how to respond. For reference, at the start of the consultation period, the Database included:

- 54 County Borough Councillors
- 26 Representatives of Town and Community Councils
- 59 Statutory Consultees
- 143 Other Consultees
- 15 Developers / Land Owners
- 57 Individual Members of the Public

2.7 A detailed list of the bodies engaged during the Preferred Strategy Consultation is provided in Appendix 3. As the consultation progressed, additional representors were informed of and added to the database upon request.

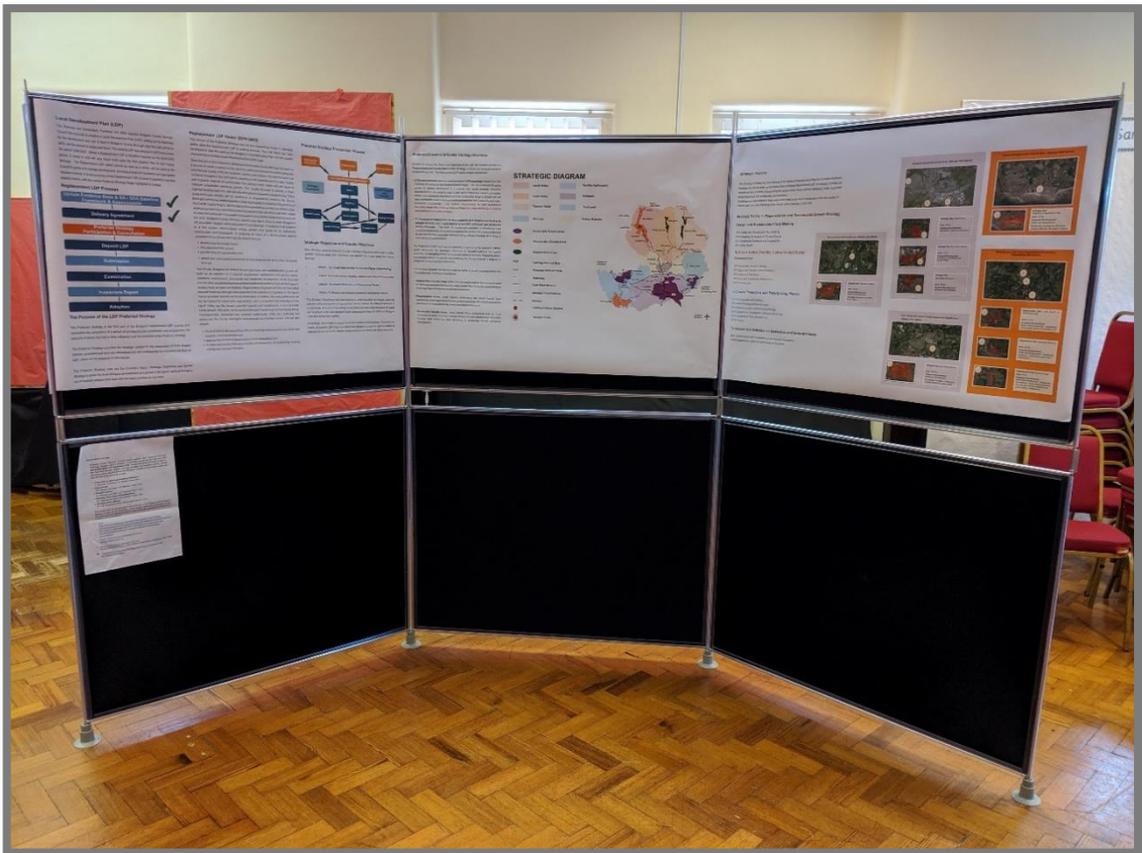
Public Exhibitions

2.8 A schedule of exhibitions were arranged across the County Borough, enabling local residents to 'drop in' within the advertised times to discuss the scope of the Preferred Strategy, share opinions and find out how to make formal representations. A minimum of two Development Planning Officers were present at each of the thirteen exhibitions to explain the process directly to members of the public and to clarify any queries. Hard copies of the documents and background papers were made available at each exhibition along with bilingual exhibition boards documenting key elements of the Preferred Strategy. The exhibitions were held throughout the consultation period in accordance with the advertised timetable as follows:

- **Portacabin at Jennings Building, Porthcawl**
 - 7th October 12pm-6pm (48 attendees)
 - 8th October 10am-1pm (22 attendees)
- **Pyle Library**
 - 14th October 2pm-6pm (35 attendees)
 - 15th October 10am-1pm (30 attendees)

- **Pencoed Library**
21st October 2pm-6pm (20 attendees)
22nd October 10am-1pm (16 attendees)
- **Maesteg Town Council Meeting Room**
28th October 2pm-6pm (2 attendees)
29th October 10am-1pm (4 attendees)
- **Bridgend Civic Offices**
4th to 8th November 2019, office hours 8.30am-5pm (9 attendees)

Figure 3: Public Exhibition at Maesteg Town Council, October 2019



Town and Community Council Engagement Events

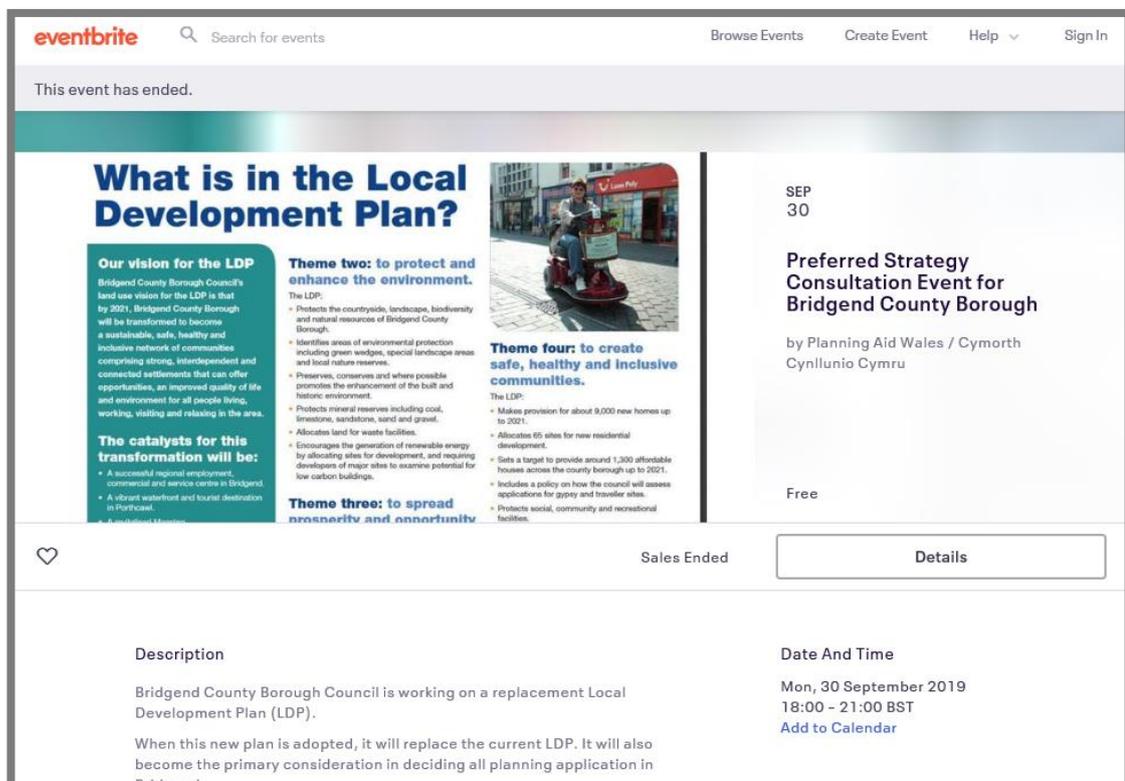
- 2.9 Planning Aid Wales were commissioned by the Council to run engagement events for all Town and Community Councils in Bridgend County Borough; both before and during the consultation. These events were designed to provide more information on the LDP process, the implications of the Preferred Strategy and details of how to respond and shape the process.
- 2.10 Five events were originally planned based on grouped clusters of Town and Community Councils in order to provide a geographical focus point at each event.

Central venues were selected within these clusters, based on the availability of suitable halls, Planning Aid staff and Town and Community Councillors, whilst ensuring the events were spread over a suitable four-week period. The original advertised timetable was as follows:

- Monday 23 September, 6pm – 9pm, Maesteg Town Hall
- Monday 30 September, 6pm – 9pm, Ynysawdre Parish Room
- Friday 4 October, 5.30pm – 8.30pm, Brackla Community Hall
- Monday 7 October, 1pm – 4pm, Cefn Cribbwr Green Hall
- Monday 14 October, 6pm – 9pm, High Tide Inn, Porthcawl

2.11 All clerks were contacted in order to advertise the engagement events and respondents were able to book places via Eventbrite (Figure 4), or by contacting Planning Aid Wales directly by telephone or email. There were no restrictions placed on the number of representatives from each Town and Community Council. However, due to a lack of responses, the Cefn Cribbwr event had to be cancelled and was replaced with a substitute event at Heol y Cyw Welfare Hall on Monday 4th November from 2.30pm – 5pm.

Figure 4: Eventbrite Town and Community Council Engagement Invite



2.12 At the events, Planning Aid Wales staff acted as independent and impartial facilitators in order to encourage attendees to express their views and opinions

openly. Council Officers were purposely not present to avoid undermining the role of the facilitators, to allow feedback to be collated objectively and, ultimately, to avoid detracting from the purpose of the events. Planning Aid Wales effectively captured this information at each event and reported the feedback to the Council to consider as part of the Preferred Strategy consultation. A copy of the related report prepared by Planning Aid Wales is provided in Appendix 1.

Youth Council Open Day Exhibition

- 2.13 Following liaison with the Council's Children's Rights and Participation Worker, an exhibition was held at the Bridgend County Borough Youth Council Open Day on 28th October 2019, which was arranged during half term in order to maximise attendance. A large exhibition board was displayed and two Development Planning Officers attended. This provided an opportunity for participants to raise questions on local land-use issues and for Officers to provide further clarification and background information on the policies and proposals. A summary of the feedback from this exhibition is provided in Appendix 2.

Social Media and Radio

- 2.14 The consultation was also promoted periodically on social media and several posts were made on the Council's official Twitter Page during the consultation window (example provided in Figure 5). This helped to ensure that the Preferred Strategy engagement process was continually promoted at different points throughout the consultation window, providing opportunity for re-tweets and online discussion to maximise exposure. The consultation was also promoted independently through other media sources including Wales Online and Bridge FM Radio Station.

Figure 5: Mid-Consultation Twitter Post



3. Consultation on Pre-Deposit Proposal (Preferred Strategy)

3.1 The Preferred Strategy was published in September 2019, representing the completion of a period of pre-deposit plan preparation and engagement, which clearly influenced its development. The list of documents that were available for public consultation were:

- Bridgend County Borough Local Development Plan 2018-2033 Preferred Strategy Consultation Document

Background Papers

- Background Paper 1: Vision and Objectives
- Background Paper 2: Strategic Growth Options
- Background Paper 3: Spatial Strategy Options for the Distribution of Growth
- Background Paper 4: Housing
- Background Paper 5: Local Housing Market Assessment
- Background Paper 6: Employment
- Background Paper 7: Retail
- Background Paper 8: M4 Junction 36
- Background Paper 9: Compatibility Assessment of the LDP Vision, Objectives & Strategic Policies Against the Wellbeing of Future Generations Act

Evidence Base Documents

- Existing LDP Review Report
- Replacement LDP Delivery Agreement
- Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Scoping Report
- Sustainability Appraisal, incorporating the Strategic Environmental Assessment.
- SA and SEA - Initial SA Report
- The Full Sustainability Appraisal of the Preferred Strategy
- The Full Sustainability Appraisal of the Preferred Strategy Non-Technical Summary
- Habitats Regulations Assessment
- Candidate Site Register
- Settlement Assessment Study (2019)
- Demographic Analysis and Forecasts Report (2019)
- Local Housing Market Assessment (2019/20)
- Draft Economic Evidence Base Study (2019)
- Draft Retail Study (2019)
- Equalities Impact Assessments
- Bridgend Smart Energy Plan (2019)
- Outdoor Sport and Space Audits (2017)
- Special Landscape Designations (2010)

- Landscape Character Assessment for Bridgend County Borough (2013)
- Gypsy and Traveller Accommodation Assessment (2016)
- Bridgend's Active Travel Integrated Network Map
- Bridgend Destination Management Plan 2018-2022
- Bridgend Strategic Flood Consequences Assessment (2010)

3.2 The consultation was framed around twelve questions, designed to assist with individual representations and ensure all key strategic aspects of the Preferred Strategy were duly considered by respondents. Representors were asked to make specific comments on the preferred options, related policies and recommendations.

3.3 In total, 70 representations were submitted by a range of organisations/individuals. This section provides an overview of the main findings of the public consultation exercise on the Council's LDP Preferred Strategy. It is not intended to be a comprehensive report on each comment received, rather a summary of the key issues raised in response to the specific questions on the consultation form (NB. full copies of the responses are provided in Appendix 4).

3.4 **A significant number of representations were site specific in focus, although this Report does not attempt to evaluate the comprehensive merits of candidate sites. All candidate sites will be evaluated as part of the Candidate Site Assessment Methodology, which is separate to the Preferred Strategy Consultation.** The report is therefore structured around each consultation question, sets out the main corresponding points received under thematic headings, together with the Council's subsequent responses.

Question 1

The key issues and drivers identified through the Replacement LDP preparation process have directly informed the development of the LDP Vision, Objectives and Preferred Strategy.

Do you have any comments to make on the key issues and drivers?

3.5 Generally, most local residents responding the consultation agreed with all key issues and drivers. Some residents showed particular support for National and Regional Issue NR3, emphasising how Porthcawl should not extend into the open countryside to avoid causing detrimental impact upon the landscape. Additionally, there was support for local Issue and Driver LS16, as development of the waterfront was deemed critical for Porthcawl in order to strengthen its image as a tourist destination.

- 3.6 Broadly speaking, Savills (on behalf of Bridgend College) have commented that, “The identified key local issues and drivers appear to be appropriate and accurately reflect local issues which could have strategic land-use implications for the LDP”. Barratt David Wilson also state, “Given that they are general and factual in nature, BDW consider that the 12 national and regional issues (NRs) are a useful starting point”. Natural Resources Wales are also, “Supportive of the plan’s objectives and the focus of the draft policies appear reasonable”.
- 3.7 One resident largely agreed with the identified key issues and drivers, although was of the opinion that some issues and drivers could be expanded further. Specifically, it was felt that NR9 (national and regional issue) failed to reference the climate crisis and LS1 (local issue and driver) also omitted these issues. The respondent recommended considering and referencing the Bridgend Biodiversity and Ecosystems Resilience Forward Plan, Planning Policy Wales, Special Landscape Areas and Green Infrastructure. Further suggestions were made in relation to the Built Heritage and Historic Environment, noting reference to the BCBC Biodiversity and Ecosystems Resilience Forward Plan. These suggestions are noted and stronger linkages will be considered in the preparation of the Deposit Plan.
- 3.8 One respondent felt a running track was needed in Pencoed and that any new development will add further to this existing deficiency. Local issue LS14 was referenced, which has already identified deficiencies in outdoor sport provision within the County Borough, particularly in large urban centres. An updated version of the Outdoor Sport and Children’s Playing Space Audit will inform the Deposit Plan, holistically incorporating green infrastructure.
- 3.9 Another resident recognised and agreed with local issue LS11, which states that “there is a shortage in the provision of smaller dwellings; in particular one-bedroom properties in the social rented sector and 2 bedroom entry level properties in the general housing markets across the County Borough”. The respondent believes that there should be wider recognition of the national housing crisis and greater emphasis should be placed on the provision of affordable housing in the replacement LDP. This is noted by the Council, although housing need is identified in the 2019/20 Local Housing Market Assessment and area specific targets and thresholds will be identified following completion of the forthcoming affordable housing viability study.
- 3.10 The HBF have requested, “A separate heading for housing, which should include a more detailed commentary on both national and local housing issues across all tenures including market housing”. However, it is felt that these issues are already clearly referenced under the social issues section.
- 3.11 The HBF has also referenced Objective 2J (which seeks to promote new development that is designed to minimise the impact of transport emissions through the implementation of new technology, including provision of infrastructure that supports the use of ultra-low emission vehicles). The HBF argue that, “The wording and requirements of this policy should be in line with Welsh Government guidance which the HBF understand will be consulted on

next year, rather than a separate local requirement". This comment is acknowledged and any policy developments will be kept under review in preparation of the Deposit Plan.

Settlement Hierarchy

- 3.12 A number of representations have been submitted that discuss the merits of the Settlement Hierarchy, whilst also supporting or opposing the position of certain settlements within it.
- 3.13 The Welsh Government is broadly supportive of the approach used to arrive at the settlement hierarchy. It is stated that, "The settlement hierarchy has been informed by a Settlement Assessment Paper, the methodology of which is detailed, sensitive and weighted towards sustainability criteria, in particular the proximity to and frequency of public transport at peak times, employment opportunities and services and facilities". The potential strategic sites within growth areas will be subject to a detailed assessment of delivery, phasing, infrastructure requirements and viability to both inform and support the Deposit Plan.
- 3.14 WYG Environment Planning Transport Ltd (on behalf of Persimmon Homes West Wales) consider that, "The Settlement Hierarchy outlined within the Preferred Strategy...will allow for a sustainable pattern of growth". WYG also consider, "That a preferred strategy which focuses development on these existing primary and key settlements will achieve a plan that is 'appropriate' in soundness terms". WYG also specifically stress that, "Persimmon Homes West Wales support the designation of Bridgend as the County's 'Primary Key Settlement' due to its ability to accommodate sustainable growth whilst supporting existing facilities, infrastructure and services". CBRE (on behalf of Ford Motor Company Ltd) also, "Welcome the preferred strategy and the clear recognition that Bridgend would continue to be the main focus for regeneration and sustainable development".
- 3.15 Savills (on behalf of Bridgend College), consider that, "The role of Pencoed as a 'Main Settlement' is supported and reflects the economic function, availability of facilities and range of sustainable travel opportunities (including a train station) in the town". Lichfields (On behalf of Persimmon Homes) also welcome the acknowledgement of the large-than-local role of Pencoed, support its identification as a Sustainable Growth Area and highlight the link with their client's strategic allocation at Parc Llanilid, Llanharan, Rhondda Cynon Taf. As such, and in the context of the Cardiff Capital Region, the need for appropriate infrastructure, including cross-boundary transportation, is stressed. Lichfields endorse, "The recognition of the need for the emerging LDP to maximise the socio-economic benefits from the implementation of the South Wales Metro and the Cardiff Capital Region (CCR) City Deal".
- 3.16 On behalf of Taylor Wimpey, Lichfields have submitted representations that support Porthcawl as a hub for services, employment, housing and retail within the region and state that "it is highly appropriate that it is designated as a Regeneration Growth Area". However, it is suggested, "NR3 should recognise the role of Porthcawl as a hub for services, employment, housing and retail, in

addition to its status as a tourism and leisure destination". Barratt David Wilson have made similar comments; welcoming, "The inclusion of NR1 which recognises the role that Porthcawl plays as a hub for a range of uses including housing", whilst suggesting NR3 should, "Recognise the attractiveness of the town as a place to live, and work, beyond its role as a tourist destination". Lichfields are also of the opinion that, "Porthcawl is not reflected at Strategic Objective 1d, which focuses only on the potential of Porthcawl as a tourist destination", and, therefore, Lichfields suggest additional emphasis on Porthcawl as, "A key hub for services, employment, housing and retail development". These comments are noted and the Strategic Objective will be refined to reflect the impact that the Waterfront Regeneration will have on the Town Centre in these broader respects.

- 3.17 On behalf of Llanmoor Homes, DPP have argued that, "The settlement of Bettws has not, however, been identified in either of the two Areas [Regeneration Growth Areas and Sustainable Growth Areas]. This, in our view, is a failing of the Plan and no apparent justification is included within the Strategy for this". Contrary to this statement, the justification for not allocating significant growth to Bettws is considered highly evident. The 2019 Settlement Assessment has clearly identified Bettws as a Local Settlement and Background Paper 3: Spatial Strategy Options evaluates a number of reasonable alternatives to accommodate growth before justifying the preferred spatial strategy. Moreover, Bettws is within the Valleys Gateway and there are capacity issues running north to south at Junction 36, which is discussed in more detail in Background Paper 8.
- 3.18 Similar arguments are put forward by a group of landowners in relation to South Cornelly. It is argued that South Cornelly is, "Functionally linked with Pyle / North Cornelly, both physically and in terms of access to shops, services and facilities, and employment opportunities". On this basis, the group of landowners consider that South Cornelly should be included as part of the grouped main settlement of Pyle, Kenfig Hill and North Cornelly. It is also argued, "An insufficient level of growth is planned for 'Local Settlements'", which is considered to, "Compromise the long term sustainability of local facilities and services in these areas and restrict economic growth". Whilst the functional linkages between South Cornelly and the grouped main settlement of Pyle, Kenfig Hill and South Cornelly are fully acknowledged, the 2019 Settlement Assessment has identified South Cornelly as a Local Settlement in its own right. This is based on application of a tri-principle scoring matrix relating to sustainable transport and accessibility, facilities and services plus employment provision. South Cornelly was not considered an area that demonstrates capacity for significant sustainable growth, hence why it was not identified in the Preferred Strategy. A settlement boundary review will also take place to inform the Deposit Plan.
- 3.19 Equally, RPS (on behalf of Barratt David Wilson) have stated, "The Preferred Strategy does not acknowledge the functionality between Bridgend and Laleston and the role that Laleston could play in accommodating growth in the Bridgend Sustainable Growth Area". RPS consider that, "The settlement should not be overlooked as a sustainable location for growth". However, the 2019 Settlement Assessment clearly identified Laleston and Merthyr Mawr as a Local Settlement

and significant growth in this vicinity would not accord with this classification. Refer also to Background Paper 3: Spatial Strategy Options. Correspondingly, RPS highlight that the 2019 Settlement Assessment has omitted the presence of an Active Travel route that passes through the southern boundary of Laleston. On this basis, RPS feel, “The Preferred Strategy does not acknowledge the functionality between Bridgend and Laleston and the role that Laleston could play in accommodating growth in the Bridgend Sustainable Growth Area”. The Council welcomes RPS having highlighted this typing error and can confirm the report will be corrected, with the respective tables documenting four additional points for Laleston and Merthyr Mawr (owing to the presence of one Active Travel route within the settlement). However, this typing error does not change the position of Laleston and Merthyr Mawr within the Settlement Hierarchy and in any case, the Council was aware of this route when developing the Preferred Strategy. Whilst this comment is therefore considered helpful, it does not serve to alter or undermine the spatial strategy or level of growth apportioned to the respective settlement. Indeed, other settlements deemed Local Settlements still score more highly than Laleston and Merthyr Mawr within the Settlement Assessment, even with a four-point addition to the latter.

- 3.20 In terms of broader geographic distribution, Merthyr Mawr Community Council have stated, “The difference in the economy between the valleys and the coast needs to be addressed”. Also, Savills (on behalf of Lavignac Securities Limited) have expressed concerns that,

“there are a number of references within Table 2 of the Strategy (Page 26) to the key national and regional issues that on the one hand promote the Llynfi, Ogmore and Garw Valleys for economic development, yet on the other hand and throughout the Preferred Strategy Consultation Document discounts or discourages the economic growth of the Valley Gateway on the basis of the M4 Junction 36 Background Paper”.

- 3.21 The Key Issues and Drivers have led to the Ogmore and Garw Valleys being identified as Regeneration Areas, which are settlements that would benefit from **community based regeneration**, recognising that a range of localised approaches are required to incite community investment opportunities. These areas are not earmarked for significant growth. Maesteg and the Llynfi Valley is collectively identified as a Regeneration Growth Area in recognition of the fact that larger brownfield regeneration schemes are remaining, acknowledging that longer lead-in times may sometimes be required. However, the sites in Maesteg and the Llynfi Valley are within walking distance of both railway stations and bus routes, thereby promoting active travel opportunities, conducive to PPW’s placemaking principles. Maesteg is also considered to have a high level of self-containment. As referenced in the 2019 Settlement Assessment, it is the second largest town in the County Borough, is the main commercial and shopping centre for the Llynfi Valley and benefits from significant employment and manufacturing centres and industrial estates. The rationale for the spatial distribution of growth is clearly set out in Background Paper 3, along with the 2019 Settlement Assessment. The constraints that prevent significant growth being allocated to the Valleys Gateway are explained in Background Paper 8: M4 Junction 36.

Alignment with the NDF, Emerging SDP and Regional Planning

- 3.22 Savills also consider that, “The NDF identifies the Valleys gateway area and the Llynfi, Ogmore and Garw Valleys as being located within a National Growth Area (NGA)”. On this basis, it is argued, “The Preferred Strategy should recognise the potential implementation of the NDF and the need to future proof it for the reparation of any forthcoming Strategic Development Plan as part of the Cardiff City region”. The Council considers the Preferred Strategy to be in accord with the draft NDF proposals. Specifically, Bridgend is identified as the key growth area within the draft NDF and as the Primary Key Settlement within the Preferred Strategy. The draft NDF does not spatially define ‘the Valleys’ although, in any case, the designation of Regeneration Areas and Regeneration Growth Areas will help ensure appropriate levels of sustainable economic growth are enabled within the northern part of the County Borough.
- 3.23 Lichfields (on behalf of both Persimmon and Taylor Wimpey) have recognised the need for alignment between the Replacement LDP, emerging National Development Framework (NDF) and Strategic Development Plan (SDP) for the Cardiff City Region. However, Lichfields have expressed concern around the NDF’s emphasis on affordable housing, use of 2014 based principal projections and high affordable housing ‘targets’. Lichfields argue that the Council, “Should not seek to align its housing figures with the (market and affordable) housing figures contained in the Draft NDF, as this would fail to meet actual housing need and would potentially undermine the deliverability of future development”. The level of growth underpinning the Preferred Strategy is robustly justified by the 2019 Demographic Forecasts and Analysis Report, the 2019 Economic Evidence Base Study and Background Paper 2: Strategic Growth Options.
- 3.24 Lichfields endorse the Preferred Strategy’s recognition that the 411 affordable homes needed per annum in Bridgend County Borough should not constitute a delivery target. Lichfields are of the opinion that, “Careful consideration is required in respect of the quantum of affordable housing that is to be provided, the mechanisms for delivery, and the implications of the high affordable housing need on overall housing requirements over the LDP period”. An area based affordable housing requirement will be developed as part of the Deposit Plan and will be based on the 2019/20 Local Housing Market Assessment and forthcoming affordable housing viability study.
- 3.25 DPP (on behalf of Edenstone Homes) stated, “We consider that the key issues and drivers have been identified and are covered here”, whilst considering, “That greater emphasis could be given to Bridgend’s role within the Cardiff Capital - from both a housing and economic perspective”. The Council note these comments, although many references and links are made to the Cardiff Capital Region throughout the Preferred Strategy, most prevalently in the Vision itself, along with Key Issues NR1, NR6, NR7, NR10. DPP also emphasise that, “The western fringes of Bridgend will also have a role to play, to some degree, with the Swansea Bay Deal” and advocate greater consideration of this relationship. Again, this comment is noted and crucial interdependencies between the Swansea Bay Region and the Cardiff Capital Region are important given Bridgend County Borough’s pivotal position in this respect.

Demographics, Economic Activity and Employment

- 3.26 Lichfields (on behalf of Persimmon Homes and Taylor Wimpey) support the Preferred Strategy's recognition that, "The County Borough would benefit from additional younger, economically active households in order to counterbalance the ageing population and help to attract and support business growth". The need for a range of housing types to meet the needs of younger people is stressed, as is the importance of supporting future economic growth by making "adequate provision for employment-generating facilities". These comments are noted and are already fundamental components of the Preferred Strategy. Refer to Background Paper 2: Strategic Growth Options and the 2019 Economic Evidence Base Study.

Question 2

The Preferred Strategy makes provision for a level of growth that would enable provision of up to 4,995 jobs, supported by a housing provision for 8,333 new homes to meet a housing requirement of 7,575 dwellings. This represents Mid Growth Option from the Strategic Growth Options Background Paper.

Do you have any comments to make on the preferred level of growth?

- 3.27 A range of comments have been made on the justified growth option, with some representatives in broad support, others suggesting the option is not ambitious enough and others suggesting the option is too high.

Broadly Supportive Comments

- 3.28 The Welsh Government supports the principle of the Council's approach and "considers the latest projections have been taken into account by the Council, along with other relevant policy considerations set out in paragraphs 4.2.6 – 4.2.8 (PPW, Edition 10)". The Welsh Government is therefore "broadly supportive of the level of homes and jobs proposed", stating that the link "is not disputed, and is consistent and aligns with the preferred growth option".
- 3.29 Welsh Water have advised that, "There is no reason why a combination of Welsh Water's regulatory investment and developer funded infrastructure improvements cannot ensure this number of new units is delivered over the plan period".
- 3.30 Savills (on behalf of Bridgend College) have expressed their support for the Mid Growth Option as being the most appropriate to achieve a balanced and sustainable level of economic growth. Savills have stated, "This identified housing requirement makes use of the most recent household population projections and recognises the need to encourage a more youthful, skilled population base to counter-balance the ageing population, which is supported". Savills add, "It is encouraging that the Council recognises the direct relationship between the provision of housing land and economic growth".

- 3.31 Boyer Planning have also commented that the Mid Growth Option is “considered reasonable in the context of supporting a balanced and sustainable level of economic growth and meeting housing need”, notwithstanding having concerns with some of the components of housing supply.
- 3.32 Barratt David Wilson broadly support the proposed level of housing growth “provided it is treated as a starting point and is not reduced through the plan making process”. Barratt David Wilson also state, “It is encouraging that the Council recognises the direct relationship between the provision of housing land and economic growth”.
- 3.33 Geraint John Planning (on behalf of Pobl) cite “no fundamental objection to the level of employment land the Authority are seeking to provide through the revised LDP”.
- 3.34 Asbri Planning have commented that the Mid Growth Option “seems reasonable”, accepting that “a high growth level of 680 dwellings a year may be unrealistic”, although acknowledging certain past years have witnessed higher completions than others, which could justify a higher figure.
- 3.35 DPP, “Support Bridgend CBC’s decision not to go for the lower level of growth, but to try and aim higher which would provide an ‘equilibrium’ in terms of growth in employment and population”. DPP also reference the fact that this should be considered an ‘absolute minimum’ and advocate exploring a higher level of growth.
- 3.36 The Council notes all of these comments. It should be reiterated at this point that alternative scenarios have been given due consideration (as discussed within Background Paper 2: Strategic Growth Options), before arriving at the preferred, justified growth option.

Employment Land Provision

- 3.37 The Welsh Government has sought clarification on why Strategic Policy 1 has made provision for 71.7 hectares of employment land to deliver the 60 hectares of employment land need identified in the Economic Evidence Base Study. The Welsh Government state,
- “In essence, the 60ha is inclusive of flexibility as it is on the ‘upper end’ of what could be achieved. These conclusions are stated within the plan at paras 5.4.16-5.4.17. On this basis the rationale for this over allocation which adds an apparent ‘double flexibility’ **is not clear and requires explanation and justification. In particular, given the level of homes and jobs are linked, what are the implications for this approach on the level of homes and jobs in the plan?**” (original emphasis).
- 3.38 Geraint John Planning (on behalf of Pobl) have also raised concerns about identifying previously allocated land, which is yet to be realised. A flexible approach is suggested for Ty Draw Farm, Pyle specifically to, “Allow and cater

for the site's development on a range of uses, including C3 residential (where appropriate and the surrounds are fitting to cater for and allow residential development)".

3.39 Merthyr Mawr Community Council has also questioned the level of employment land underpinning the Preferred Strategy. Whilst a "good supply of land for employment" is welcomed, it is considered that, "Land, once designated for development, is unlikely to become undesignated should circumstances change". Reference is made to the importance of regenerating unoccupied employment sites and, "Vacant areas within current employment zones". Merthyr Mawr Community Council have also expressed concerns, "That the strategy does not include an acknowledgement of the potential changes in the economic climate and consequent housing and employment demands".

3.40 In addition, Cwm Taf Morgannwg Public Health Team have referenced the ageing population in the County Borough and stress that, "As state pension rises, older people will still be part of the workforce. They also have assets and skills that contribute to community cohesion".

3.41 CBRE (on behalf of Ford Motor Company Ltd) consider that, "The regeneration of the Ford Bridgend site represents a strategic opportunity". More specifically,

"It is considered critical that the use of a safeguarding policy does not unnecessarily constrain opportunities. In an ever-evolving business environment, and as recognised in the employment policy, the need to ensure flexibility for repurposing of sites, responding to market conditions and market signals, and consideration of securing viable and sustainable development will be critical. Constraint by B Use Classes may be counter productive to ensuring such flexibility is secured".

3.42 The Council notes all of these comments, which are inter-related, and argue against rigidly allocating an excess of employment land, whilst ensuring the Replacement LDP can respond to changing circumstances. However, the planned level of housing growth is neither constrained in a manner that could frustrate economic development or promoted in such a way as to encourage inward commuting. Rather, the underlying projection seeks to promote sustainable forms of growth that will help minimise the need for out-commuting and promote more self-contained, interconnected communities. The Economic Evidence Base Study indeed states that,

"the demand assessment identifies that at most 60 ha of employment land can be justified over the 15-year plan period, averaging at 4 ha per annum. This allows for 2 ha of net growth (associated with higher housing targets) and also to provide for replacement of past losses at 2 ha per year". This level of employment land provides capacity to

accommodate slightly more jobs (333) than additional employable people (266) per annum, providing a small contingency should new job creation be more biased to industrial as opposed to office uses. Underpinning the LDP on this level of employment growth would therefore ensure there is plentiful employment land to meet the needs and requirements of a range of future potential employment scenarios”.

3.43 The Study then goes onto identify what land should be allocated to meet the identified need, considering existing supply and possible new sites. A review of the suitability of the existing employment sites portfolio has been conducted, which determined that 15 of the 37 sites identified in the existing LDP “are capable of contributing to the supply that in total sums to 43.7 ha, some 17 ha short of the upper limit of the justifiable need”. This comprises almost all undeveloped parcels within existing estates. In addition, the study recommends, taking forward three of the four existing Strategic Sites that will contribute a further 28 ha to the supply of employment land.

3.44 The conclusion of the Economic Evidence Base Study in this respect is stated in paragraph 6.58,

“Our view is that this possible over-supply [i.e. a total of 71.7ha] should provide the Council flexibility to choose to release further sites where the planning balance may suggest that sites are better used for alternative uses. So, for example, where a site may be viewed as equally good for housing, retail or community uses, and where releasing the site for these other uses does not threaten the integrity of the remaining employment sites”.

3.45 This is the rationale for the provision identified in Strategic Policy 1 (i.e. 71.7 hectares of employment land, which is 20% higher than the 60 hectare need identified). However, in light of these comments, the 20% additional employment land flexibility allowance will be re-considered during preparation of the Deposit Plan, ensuring that careful alignment is maintained with the housing requirement flexibility allowance.

3.46 Moreover, the Preferred Strategy will be implemented by a new Development Management Policy that will seek to manage the release of the existing employment stock effectively. This policy will add flexibility to respond to changing market signals and encourage alternative uses for sites or buildings that cannot be viably re-used for employment purposes. As stated in paragraph 5.4.17 of the Preferred Strategy,

“This is considered an unrestrictive and positive approach to ensure that a range and mix of site types are available across the County up until 2033; providing plentiful scope for continued investment without frustrating housing supply. This will facilitate allocation of enough land so that at least every new worker, suggested by the demographic evidence, has an opportunity to work in Bridgend’s B class economy should the employment market respond positively to the increase in labour supply. The relationship between the uplifted homes, labour

supply and jobs, will be kept under review in the context of the Cardiff Capital Region”.

3.47 Welsh Government have also referenced the need to improve clarity and presentation of the Employment Chapter within the Preferred Strategy. These detailed points are noted by the Council and will be reflected in the Deposit Plan.

3.48 More specifically, Barratt David Wilson consider that,

“if the Replacement LDP is to allocate additional employment land in Porthcawl, the quantum of housing and its distribution must reflect this. Furthermore, as a general point, the Waterfront Site provides an opportunity for the Council to deliver modern employment and business units alongside the proposed foodstore and mixed leisure / tourism proposals (and housing) at the Waterfront”.

3.49 The need for employment land and the spatial distribution thereof is document in the 2019 Economic Evidence Base Study. In terms of the Waterfront Site specifically, a masterplanning exercise will be completed to inform the Deposit Plan.

Preferred Strategic Growth Option (Level)

3.50 The HBF has objected to the chosen growth option, “Based on the lack of economic ambition and alignment with the Councils own economic growth ambitions as well as those of the City Deal”. It is argued that the proposed growth level “is in fact not aspirational enough” and claimed that, “Past delivery rates appear to be given great wait (*sic*), yet the fact that these were below the previous plans housing target is ignored”. Lichfields also reference this point and state “The average number of completions during this time was only 506dpa, 21.9% below the requirement figure”.

3.51 LRM Planning (on behalf of Taylor Wimpey) do not support the Mid Growth Option, declaring that “the need figure is based on post-recession trends and does not provide the basis for an accurate forecast over the next 15 year period”. The High Growth Option is considered to be more appropriate by LRM Planning. The HBF also object to the household formation rates used, stating, “The 2014-based household projections are based on trends experienced between 2009 and 2014 and so have been heavily influenced by the recession”. Reference is made to variables such as lack of mortgage finance, lower employment levels and reduced rates of housing completions having suppressed household formation during this period. The HBF argue that the Preferred Strategy evidence base has not taken account of these trends. This view is shared by Barton Willmore, who argue that “the Mid Growth Option is

grounded in post-recession trends”, and instead, consider that, “The High Growth option should be pursued, with higher levels of growth also considered appropriate to underpin the County Borough’s economic aspirations as part of a wider region benefitting from a City Deal”.

3.52 Contrary to these interpretations, the level of housing proposed within the Preferred Strategy is actually 3,510 dwellings above the Welsh Government 2014-based principal projection and 2,475 dwellings above the WG 10 year migration variant even before the flexibility allowance is factored in. Furthermore, Background Paper 2: Strategic Growth Options actually acknowledges (on several occasions) that the 2014-based projections are indeed heavily influenced by recessionary trends and would result in out-migration, especially amongst the economically active, which would not deliver on the range of issues the plan is seeking to address. Hence, the proposed demographic led scenario is **not** simply derived from the 2014-based principal projection, rather recalibrated to include three additional years of mid-year estimate (2014-2017) data. The rationale behind this preferred growth option is very clearly explained in the 2019 Economic Evidence Base Study and Background Paper 2: Strategic Growth Options, which both support and draw on the evidence within the 2019 Demographic Analysis and Forecasts Report. As Background Paper 2 concludes, the Mid Growth Option is considered most conducive to achieving an equilibrium between the number of economically active people remaining within and moving into the County Borough plus the number of employers relocating and/or expanding within the same vicinity. It is therefore inaccurate to state that past delivery rates have been ‘ignored’ on a relative basis, rather they have been re-considered in light of more recent demographic trends and migration patterns over a six-year historical period (2011/12–2016/17); updated to include the latest three years of population statistics. This means there are more recent components of change (i.e. births, deaths, internal and international migration trends) used to calibrate the assumptions underpinning the dwelling requirement in the Preferred Strategy.

3.53 Conversely, Merthyr Mawr Community Council consider the Mid Growth Option to be, “A high growth figure in that the difference between the 3 figures mean that the mid term growth is significantly weighted at the higher end of the given spectrum”. This is not considered to be, “A reasonable assumption for the area” and the Community Council is of the opinion that,

“There appears to be a mismatch between the preferred strategy to support growth of up to 333 jobs per annum, the amount of houses at 505 per year and the aim to minimise out commuting. This is given that most working households will have more than one person in employment”.

- 3.54 Reference is also made to “the upcoming loss of 1700 jobs at Ford” and concerns are cited, “That the projected desired housing figure may not fully take into account the amount of houses being built and projected over all within the wider Cardiff Capital Region”.
- 3.55 The rationale for the preferred level of growth is explained in Background Paper 2, which reflects the most recent post-recession trend based data available, would appear deliverable based on recent trends and would also facilitate an element of economic aspiration to inform the housing requirement within the replacement LDP. Furthermore, the 2019 Economic Evidence Base Study also concluded that the number of jobs supported under the Mid Growth Option is likely to be an upper estimate of what can be delivered in Bridgend County Borough and additional over-supply of dwellings may otherwise lead to a proliferation in unsustainable commuting patterns. Proceeding on this basis could lead to delivery of excessive greenfield sites at the expense of more sustainable urban extensions and regeneration schemes, thereby rendering it difficult to achieve an equilibrium between economic growth and sustainable development.
- 3.56 Nevertheless, the HBF claim that, “Little or no consideration appears to have been given to the economic/employment implications of the scenarios or the extent to which they would align with the identified employment target for the LDP period or the growth aspirations of the Cardiff Capital Region City Deal”. This statement is factually incorrect and a significant level of consideration has been given to the link between economic growth, dwellings, employment, jobs and employment land. This is well documented in the Preferred Strategy itself (Chapters 4 and 5 especially refer) in addition to key evidence base studies (the 2019 Economic Evidence Base Study and the 2019 Demographic Analysis and Forecasts Report) and Background Papers (2: Strategic Growth Options, 4: Housing, 6: Retail and 7: Employment). The fundamental intention of the growth option underpinning the Preferred Strategy can be succinctly explained by the acronym ‘**CARM**’, which seeks to **Counter-balance** the ageing population by **Attracting** skilled, economically active households, **Retaining** skilled, economically active households and rendering the County Borough a **Magnet** for employers to move into or expand within. As explained clearly within the evidence base, the Mid Growth Option would therefore help to achieve a better balance between the location of employment and housing, facilitate delivery of varied job opportunities and provide a level of employment land deemed realistic by the Economic Evidence Base Study. Turley (on behalf of Ashfield Land) have commented, "To achieve the above it will be important to provide attractive and diverse centres, providing a suitable mix retail and leisure uses", which is noted.

Preferred Strategic Growth Option (Methodology)

3.57 Lichfields have argued, “There are a number of issues with the methodology applied as part of the Council’s assessment of housing need, which indicate its unsuitability as the basis for the emerging housing requirement and its insufficiency to achieve the aims of the LDP Preferred Strategy”. Lichfields are also of the opinion that, “The proposed housing requirement would fail to deliver the level of housing required to support this aim (CARM)”. However, the evidence base has thoroughly considered the relationship between economic growth, dwelling provision, employment, jobs and employment land (the 2019 Economic Evidence Base Study, the 2019 Demographic Analysis and Forecasts Report, Background Papers 2: Strategic Growth Options, 4: Housing, and 7: Employment refer). Lichfields have submitted comprehensive responses to substantiate these claims and the key elements of these responses will now be evaluated in turn.

3.58 Firstly, Lichfields state that,

“The analysis undertaken by Edge Analytics shows that the proposed housing requirement of 505dpa would support between 219 and 266 additional jobs (*sic*) per annum. As set out below, this is significantly lower than the target identified by Strategic Policy 1 and even more substantially lower than the past levels of job creation in Bridgend County Borough. Hence, it would not even support a “business as usual” approach to the economy”.

3.59 Both the Economic Evidence Base Study and the Demographic Analysis and Forecasts Report have clearly defined the difference between ‘employment’ and ‘jobs’. Essentially, the 266 employment growth referred to is a *people* measure of employment, acknowledging that a person might support one or more jobs but counting a person once. This represents the labour force and the level of employment that the level of population growth the Mid Growth Option could support. This does not translate directly into ‘jobs’ as Lichfields infer, hence why the number of jobs Strategic Policy 1 seeks to accommodate (4,995 jobs or 333 per annum) varies from the employment number. As paragraph 1.10 of the Economic Evidence Base Study states,

“The need to focus on ‘jobs’ means that care must be taken when considering the employment implications of demographic projections. In reality, one person may have more than one job (e.g. two part time jobs) due to a range of factors (availability of employment, lifestyle factors, choice, population ageing etc.) and due to population ageing this is a growing trend in the economy. Furthermore, the number of employed persons in the economy is not a proxy for job availability. As such,

projections of 'employed persons' in the economy under particular growth scenarios cannot be used to determine employment land requirements and demographic evidence cannot directly be taken as a guide to the number of jobs. Rather, as detailed in this report, employment need must be calculated based on the availability and requirement for jobs".

3.60 Therefore, Lichfields' deduction that 266 'jobs' (*sic*) "is significantly lower than the target identified by Strategic Policy 1" is incorrect. As Chapter 4 of the Economic Evidence Base Study discusses in depth, there is no guarantee that the local economy will choose to pick up this labour or that all of these economically active persons will choose to work. However, the LDP has nevertheless made provision for slightly more jobs than employed persons (333 per annum) to allow the local economy to respond in a positive way to the planned economic growth. This is a key element of the Preferred Strategy.

3.61 Secondly, Lichfields argue that,

"This figure of 4,995 jobs over the Plan period (333 jobs pa) appears to have been calculated based on a proposed employment land requirement of 4ha. This land requirement includes 2ha to "manage baseline growth" and an additional 2ha to reflect the possible labour supply to be accommodated by the Mid Growth Option (totalling 266 "employable people"). It therefore follows a demographic-led approach rather than planning for a particular economic growth target, which is the method required by PPW".

3.62 The Economic Evidence Base Study has utilised a range of approaches to determine the level of jobs and employment land needed to underpin the Preferred Strategy (this is also clearly documented in Background Paper 7: Employment). These approaches include:

1. A past take-up analysis, which has analysed delivery of employment land in the existing LDP period, cross referenced with taxation based floorspace data from the Valuation Office Agency. Projecting forward the most recent data would suggest a need of 2 ha per annum, and, within this estimate there is scope to manage windfall losses without any further adjustment.
2. A labour demand approach, which has utilised an economic forecast from Experian to identify sector change over the plan period, translated into land use categories plus demand for floorspace and then verified through examination of other market information. A gross employment land analysis of this forecast also suggests need for 2 ha of employment land per annum.

3. A labour supply approach, which determines the level of employment that could be supported based on demographic analysis of the population size, the potential labour force, commuting ratio expectations and unemployment rates. This approach generates need for 2 ha of additional employment land per annum over and above the original 2 ha justified separately by the past take-up approach and labour demand approach.

3.63 Therefore, both past trends and the economic forecasting approach indicate that 2 ha of employment land a year will be required a year – largely driven by windfall losses from existing stock being reutilised as opposed to new sites and net additional floorspace being delivered. In addition, because the Preferred Strategy is seeking to deliver more new homes than the principal or variant Welsh Government projections, an additional 2 ha of annual employment land is provided to ensure the LDP will make positive provision for a younger (working age) migration profile. This has assumed every new employed person will generate demand for B class space and jobs come forward as a mix of offices and industrial (i.e. 1:24 sqm per job). The total 4 ha per annum therefore provides capacity for slightly more jobs than employed persons (333 jobs); providing additional contingency for the mix of potential jobs to differ or land not to come forward. It is therefore wholly inaccurate to state that the Preferred Strategy “would not even support a “business as usual” approach to the economy”.

3.64 Thirdly, Lichfields have also argued that it is “unclear why the Council has selected the six-year scenario as the Mid Growth Option, rather than the 16-year scenarios, which encompasses longer-term trends”. This is actually very clearly explained within Background Paper 2,

“The POPGROUP Short Term Scenario is based on migration over a six-year historical period (2011/12–2016/17); updated to include the latest three years of population statistics. This means there are more recent components of change (i.e. births, deaths, internal and international migration trends) used to calibrate the assumptions. This latter scenario reflects the most recent post-recession trend based data available, would appear deliverable based on recent trends and would also facilitate an element of economic aspiration to inform the housing requirement within the replacement LDP (paragraph 7.3.1).

3.65 Conversely, the Long Term scenario varies in that it is based on internal migration rates and international migration flows from a full sixteen-year period (2001/02–2016/17). Therefore, it captures high net international migration prior to 2011 along with lower net international migration in the latter half of the historical period. This is considered a less robust basis to inform the Preferred Strategy.

3.66 Fourthly, and in order to support the points made, Lichfields have conducted their own, alternative economic growth analysis. Lichfields perceive that this alternative analysis, “Indicates that there is need for between 670 and 730 dwellings per annum to achieve the policy aims of the LDP”. This ‘need’ has been calculated “as a result of flexing the assumption applied in relation to demographic trends, economic growth and housing completions”. The detailed datasets behind these ‘flexed assumptions’ have not been made available, although there are some key differences worth noting, based on definitions provided by Lichfields:

- The scenarios modelled by Lichfields consider the relationship between dwellings and jobs as opposed to dwellings and employment. The two terms are not interchangeable and are therefore not directly comparable. The Council’s evidence base has utilised the latter to identify the growth in the labour force and then considered how this boost in economically active households translates into jobs and employment land (refer to the 2019 Economic Evidence Base Study and Background Paper 7: Employment). Lichfields reference the 2019 Demographic Analysis and Forecasts Report heavily in their response, but this needs to be considered in tandem with the 2019 Economic Evidence Base Study.
- Lichfields have incorporated 2018 mid-year estimates and have noted that they were not available at the time the 2019 Demographic Analysis and Forecasts Report was published (May 2019). It was always the Council’s intention to refresh the evidence base as the Replacement LDP progresses to consider the latest mid-year estimates together with any updates to the household projections.
- Lichfields have utilised a higher vacancy rate (4.9%, rather than the 4.8% used in the Council’s analysis 4.8%).
- Lichfields’ assessment applies age/gender-specific economic activity rates for each local authority area are based upon the national economic activity rate projections that were published by the Office for Budget Responsibility (OBR) in January 2017. Lichfields has rebased these national rates to the local authority level using data from the 2011 Census and the latest (2018) Annual Population Survey. However, the Council’s evidence base has adjusted Bridgend’s economic activity in line with the Office for Budget Responsibility’s (OBR) (July 2018) forecast of long-term changes to age-specific labour force participation, which also been supplemented with analysis of the Experian economic forecast.

- 3.67 The result of Lichfields' 'flexing of assumptions' suggests that there is misalignment between population and employment within the Preferred Strategy and that 670 to 730 dwellings per annum are required to achieve the policy aims of the LDP. The supporting rationale behind this analysis is based on a sensitivity test using the 2008-based household membership rates, and the Ministerial Letter dated 2014, which emphasised the recession-laden nature of the 2011-based projections. Both sets of projections referenced are now outdated and it should be emphasised that the Preferred Strategy is actually 3,510 dwellings above the Welsh Government 2014-based principal projection and 2,475 dwellings above the WG 10 year migration variant even before the flexibility allowance is factored in.
- 3.68 Lichfields also consider that 670 to 730 dwellings per annum is deliverable based on a **single year** of dwelling completions, stating "579 dwellings were completed in 2019; against this figure the delivery of 681 dpa would represent an increase of only 17.6%, which is considered achievable". The Council does not consider a single year of dwelling completions an appropriate gauge of deliverability and has assessed all growth scenarios against longer term past delivery rates. Lichfields have stated that "there is not rationale or justification to set future housing need by reference solely to past delivery rates". However, the Preferred Strategy has categorically not done this as referenced in the evidence base.
- 3.69 Lichfields have cited the fact that their alternative approach, "Has been endorsed by Planning Inspector for appeals in England, including at Longbank Farm in Middlesbrough¹ and at Plantation Road, Boreham, Essex², and it is considered that these conclusions equally apply in the Welsh planning context". However, Lichfields do not reference later developments in either of these cases, which are of paramount significance.
- 3.70 Firstly, the Longbank Farm, Middleborough inquiry was shortly superseded by the Examination in Public of the Redcar and Cleveland Local Plan and Inspectors Report (23rd March 2018), which carries more weight than the appeal. The Report discounts the alternative view on economic activity rates and the approach to projecting forward past growth. The Inspector concluded,

"Establishing the future need for housing is not an exact science, and no single approach will provide a definitive answer. Assessing the OAN [Objective Assessment of Need] for housing is based on an exercise of reasoned judgements on a careful assessment of the relevant evidence. In my opinion, the Council has followed this approach".

¹ Longbank Farm, Ormesby, Middlesbrough (APP/V0728/W/15/3018546) 9 March 2016.

² Land off Plantation Road, Boreham, Essex (APP/W1525/W/15/3049361) 25 May 2016.

3.71 Secondly and subsequent to the Plantation Road appeal, another appeal (Main Road, Great Leighs³) was made against Chelmsford City Council for non-determination and the appellant similarly challenged the household formation rates and economic activity rates justified by the Council. As the Inspector's Report summarises,

"The main difference between the parties was the size of the labour force that would be necessary to meet the projected growth in jobs and whether this could predominantly be met by the existing population (the Council's view) or whether additional workers would be required thus triggering the need to deliver additional housing (the appellant's view). The difference in the figures came down to the use of different forecasting models".

3.72 The Inspectors Report then concludes on this point by stating,

"The Council used the activity rates from the EEFM [East of England Forecasting Model]. However, these figures, due to the very high employment rates they predict, were considered unrealistic and implausible by the appellant who felt that the activity rates, would in reality, be much lower and produced a number of alternative EARs based on a different set of projections including OBR, EU and KCC12. Whilst I agree that the OBR rates are highly regarded, they project forward current patterns of behaviour this would mean that future likely changes to activity, such as people working longer would not be captured. However, on the basis of what I have read and the evidence provided at the Inquiry, whilst I acknowledge that the employment rates used by the Council are high I am satisfied with the explanation provided by the Council as to how they have been calculated. As these have then been used to calculate the OAN I consider that the Council's OAN to be robust".

3.73 Whilst this argument was raised again in responses to the Chelmsford Local Plan, the alternative approach (and challenge to the Council's dwelling and job requirement) was not persisted with at the Examination in Public. The Inspectors Report is yet to be published, although the Inspector's Post Hearing Advice Note considered that the Chelmsford Local Plan, "Could be found sound subject to main modifications". Further modifications to the housing and/or job numbers underpinning the plan were not matters where further modifications were considered necessary by the Inspector.

³ Main Road, Great and Little Leighs, Great Leighs (CM13 1NP APP/W1525/W/15/3121603) 26 September 2016.

- 3.74 The circumstances are considered no different in the case of Bridgend County Borough. In summary, therefore, Lichfields' claims have been disproven by Sound Inspectors' reports, later appeals and plans reaching the opposite conclusion to Lichfields. The alternative projections presented by Lichfields are therefore not considered to undermine the integrity of the Preferred Strategy's evidence base and are not considered to have as much weight as suggested by Lichfields.
- 3.75 Fifthly, Lichfields have quoted ONS Job Density data, presented as average growth per annum from 2000-2017 (412 jobs) and 2012-2017 (600 jobs). Lichfields suggest that the Preferred Strategy has not taken this into account and therefore not planned positively to support the economy. This data is derived from the Annual Business Inquiry and is defined by the ONS as "the total number of filled jobs in an area...rounded to the nearest thousand and subject to sampling and non-sampling error". However, this is a very simplistic analysis, which averages rounded data between different time periods and does not provide a robust forecast of future job change. No reference is made to the fact that national job growth was higher within each Nation and the UK as whole over these same periods (using the same method). It is highly questionable whether this can be sustained with a nationally ageing population, declining international migration, lower unemployment rates in recent years (nationally and locally) and the Government's focus on productivity. Crucially, therefore, Lichfields' job density analysis does not identify future trends or provide evidence that can be used to accurately predict what will happen over the life of the Replacement LDP. The simplistic analysis is therefore not considered robust enough to provide any certainty that job growth will continue at the same rate throughout the plan period. Similar conclusions were made by the Inspector within the Report on the Examination of the Redcar and Cleveland Local Plan (23rd March 2018) and the Inspector concluded, "Although recent job growth has been positive, analysis of past-trends does not clearly and robustly demonstrate that this is likely to continue throughout the plan period".
- 3.76 In contrast, employment-led scenarios were included in Bridgend County Borough Council's evidence base; the analysis underpinning the economic growth outlook was for relatively low growth, although headline total job growth masked growing and declining sectors. Traditional manufacturing was forecast to decline, offset by growth in office sectors, some construction and warehousing / wholesale. Employment growth figures were also derived for each of the other demographic scenarios using a robust formulation of assumptions relating to economic activity, unemployment and commuting, providing an indication of the employment growth that could be supported under this combination of growth/assumptions. The 2019 Economic Evidence Base Study also considered a range of inter-related trends that have affected job numbers. These more holistic issues are discussed in depth in both Chapters 3 and 4 of the Economic

Evidence Base Study. A range of data sources relating to past employment land take up, labour demand and labour supply have also been triangulated to robustly plan for an equilibrium between economic growth, dwellings, employment, jobs and employment land. This is considered a far more holistic basis to underpin the Replacement LDP.

- 3.77 Finally, Lichfields argue that the Preferred Strategy is not aligned with the draft NDF (which identifies Bridgend as being located within the National Growth Area in South East Wales). On this basis, Lichfields consider the Strategy fails to support the Cardiff Capital Region City Deal Aims and would not deliver an aligned policy approach between housing requirements and employment growth. Lichfields suggest that “the Council should support greater employment growth than currently set out in the Replacement LDP”. However, the County Borough is already a major regional employment hub, with specific strengths in advanced manufacturing. The Preferred Strategy seeks to enhance these assets to progressively improve the County Borough’s economic competitiveness whilst significantly contributing to the success of the Cardiff Capital Region. Based on the robust evidence base underpinning the Preferred Strategy, it is clear that the Mid Growth Option would facilitate delivery of sustainable levels of economic growth that best achieves an equilibrium between new homes and employment provision, balanced against other key infrastructure requirements. The Preferred Strategy will enable 60 hectares of new employment land to be brought forward without constraining economic opportunity or unduly preventing the release of land for other uses. This will enable accommodation of up to 4,995 additional jobs over the Plan to enable the Strategic Objectives and broader Vision to be achieved. In addition, it should be re-emphasised that the Welsh Government is broadly supportive of the level of homes and jobs proposed.

Flexibility Allowance

- 3.78 Whilst referencing that 10% flexibility is a starting point, Welsh Government have stressed,

“The key point is that the LPA demonstrates that there is sufficient flexibility at key points in the plan period through the trajectory. Statements of Common Ground will assist in clarifying the timing and phasing of all sites. The trajectory should illustrate the degree of flexibility throughout the plan period”.

- 3.79 Several commentators have suggested that the proposed housing requirement flexibility allowance should be revised. The HBF have stated “the 10% flexibility allowance is too low and should be increased in view of the plan's reliance on several regeneration and brownfield sites, several of which have previously been allocated and have a long track record of non-delivering”. The HBF also state that, “The extra flexibility that is talked about as a result of discounting sites

in the JHLAS should not be a reason to have a low flexibility percentage allowance”. Lichfields have also cited deliverability issues with previously allocated sites, raising concerns that the housing requirement does not meet the tests of soundness. However, Lichfields also state “if the emerging LDP succeeds in ensuring its housing allocations are deliverable, it is considered that a 10% flexibility allowance is acceptable”.

3.80 Barratt David Wilson have suggested an allowance of 20% should be considered instead given the historic problem with delivering a number of the sites allocated within the adopted LDP. Equally, RPS (on behalf of Barratt David Wilson) state, “The proposed Mid Growth Option would appear reasonable and justified subject to the flexibility allowance being increased and the LDP strategy not having to rely on regeneration sites”.

3.81 Asbri Planning also feel that, “A higher figure could be justified in order to allow for a potential period of prolonged growth or by increasing the flexibility allowance from 10% to 20% to allow for unforeseen circumstances.”

3.82 It should be stressed that no actual evidence has been provided by these representors to justify an alternative flexibility allowance. However, these statements are, in any event, considered premature as viability and deliverability testing of potential strategic and housing allocations is yet to be completed. The Preferred Strategy and Background Paper 4: Housing both make it very clear that the flexibility allowance is to be refined at Deposit stage. Paragraph 5.3.13 of the Preferred Strategy states,

“The final selection of sites will be dependent on further detailed site assessment work including:

- The ability to deliver the level of supporting infrastructure required;
- A masterplanning process to ensure they create sustainable, cohesive, well-designed places delivered through a strong placemaking approach; and
- A financial viability assessment to ensure the site is deliverable within the Plan period”.

3.83 Ultimately, the flexibility allowance has initially been set at 10%, although will be subject to refinement as more detailed site viability and deliverability work is completed and the housing trajectory is further developed. The flexibility allowance will be evidence based and not set arbitrarily. Additional regeneration sites will also be allocated within the Deposit Plan; located within parts of the County Borough that will benefit the most and also those that exhibit opportunities to deliver the greatest positive impacts of such growth (i.e. the Llynfi, Ogmere and Garw Valleys). However, as referenced in PPW, the housing land supply will not

be dependent on these additional regeneration sites, as some will require longer lead-in times, preparatory remediation-based enabling works and more detailed strategies to enable their delivery. These sites will therefore be considered 'bonus sites' in addition to both the provision identified in the housing balance sheet and the flexibility allowance, an approach that accords with PPW.

Small Site and Windfall Site Allowance Rate

- 3.84 Some commentators have argued that the small site and windfall site allowance documented within the Housing Balance Sheet is too high. Boyer Planning have questioned whether any assessment of urban capacity has been conducted to support this rate, argued it places less certainty over the geographical distribution of housing and considers that Welsh Government's emphasis on the role of a plan-led system will place less emphasis on speculative applications going forward.
- 3.85 Whilst the HBF supports the large windfall site allowance, the HBF has requested a reduction in the small site allowance,
- “because we consider that both current and proposed National and LDP policies will result in less small sites coming forward. Accordingly, we request a reduction in the number of units provided from small windfall sites over the plan period”.
- 3.86 DPP are of the opinion that, “There appears to be a higher than average reliance on windfall sites coming forward as part of the plan” and advocate placing more emphasis on ‘Edge of Settlement’ sites, “To deliver the overall housing strategy for Bridgend to ensure that the housing numbers continue to ‘tick over’”.
- 3.87 The rationale behind the small site and windfall site allowance is clearly documented in Background Paper 4: Housing (Sections 4 and 5 refer). It is important for the future extrapolation rate to be based on a balanced rate of completions to avoid being skewed by particularly high or low trends. Contrary to DPP's statement, therefore, a ten year average (2009/10 to 2018/19) has been utilised and considered the most robust for this purpose as this period encompasses the recession, the subsequent repercussions and the following years of economic recovery. This is actually considered a conservative projection, and delivery rates may well be higher on an annual basis, although this rate avoids undue reliance on small and windfall sites as a component of supply given the evident volatility of such dwelling completions in the recent past. This approach closely follows Welsh Government Guidance detailed in the Development Plans Manual. The Preferred Strategy is similar to the existing LDP Strategy and the revised settlement boundaries will also be broadly similar, so it is reasonable to assume small sites and windfall sites they will come forward at

this rate based on the settlement strategy and hierarchy. Indeed, a clear settlement hierarchy has been established, based on the 2019 Settlement Assessment, which actually provides certainty as to the geographical distribution of housing growth.

- 3.88 A settlement boundary review will also be conducted to inform the Deposit Plan to provide scope for small sites and windfall sites to come forward in addition to self-build, custom build, place plan led development and co-operative housing schemes. An assessment will be conducted to identify the total area of 'white land' within the revised settlement boundaries to further evidence the windfall and small site extrapolation rate. The Preferred Strategy seeks to facilitate a range of options to come forward, including self-build, custom build and co-operative housing. Strategic Policy 6 also recognises the role that Place Plans can have in assisting with identifying small, local development sites that reflect local distinctiveness and address local, specific community scale issues.

Existing LDP 'Rollover Sites'

- 3.89 A number of challenges have been made to the existing LDP 'rollover' sites proposed for re-allocation, notably Porthcawl Waterfront Regeneration Site and Parc Afon Ewenni, Bridgend. Rather than including the sites as a proposed 'rollover' allocations, certain commentators have argued that they should be assessed in the context of other strategic site options to determine which are the most appropriate. The HBF feel that, "A large element of the proposed housing supply is associated with such sites putting at risk the ability of the plan to deliver, as has been seen by the previous plan which included the same sites and a similar strategy". RPS (on behalf of Barratt David Wilson) also reference the existing LDP's under-delivery of homes due to the reliance on brownfield regeneration sites. It is suggested that, "Housing-led regeneration schemes should not be included in the overall housing supply as relying on their delivery could seriously prejudice achieving the development plan housing requirement".
- 3.90 The rationale for re-allocating these sites is well documented within Background Paper 4: Housing, informed by the 2019 Joint Housing Land Availability Study. However, paragraph 6.3 of the Background Paper specifically states that the 'roll over' sites will need to be "supported by robust evidence on delivery, phasing, infrastructure requirements and viability" to both inform and support the respective site allocations. In response to the comments, therefore, these sites will indeed be assessed with other strategic site options. This information will be available at Deposit Stage. It should be noted that representors have not substantiated claims with any supporting evidence relating to the deliverability or viability of these sites, merely provided commentary on past site history.

- 3.91 Conversely, Geraint John Planning have made a joint representation on behalf of all parties with an interest in Parc Afon Ewenni and confirmed that, “A coordinated and comprehensive approach to the development of this site is being pursued, with active dialogue and liaison having taken place with all parties in order to advance the opportunity”. Geraint John Planning have confirmed that a refreshed masterplanning exercise is to be conducted and that, “There is a commitment on behalf of the site promoters to conducting and submitting a refreshed viability assessment for the site”.
- 3.92 The HBF also specifically object to inclusion of the Maesteg Washery and Former Cooper Standard Site, Maesteg within the Preferred Strategy on the basis of their past track records of non-delivery. As detailed within paragraphs 3.7-3.12 of Background Paper 4: Housing, these sites have been classified as ‘Land Bank Commitments – Sites without Planning Permission’. Notwithstanding the status of these sites in the JHLAS, they have been initially discounted from the ‘Land Bank Commitments’ strand of supply that contributes towards the Housing Balance Sheet in the Preferred Strategy. This is a purposely conservative approach. Including the entire land bank in the housing provision total is otherwise considered a ‘high risk strategy’ by Welsh Government, where appropriate, and exclusion of these sites helps to safeguard against a lack of delivery over the life of the Replacement LDP. A significant number of the sites in this category are expected to come forward as indicated, yet excluding them at this stage provides a reserve form of supply in the event that any other sites do not come forward as anticipated. RPS (on behalf of Barratt David Wilson) have welcomed the Preferred Strategy’s acknowledgement, “That some sites in this vicinity will require longer lead in times than others for delivery to take place”, and, therefore, “Have no objection to them being included for housing-led regeneration schemes they should not be included in the overall housing supply”.

Proposed Strategic Site Delivery (Flood Risk)

- 3.93 Natural Resources Wales have commented, “We have identified issues with the regeneration and strategic sites; all will require assessment (some in areas which have not been highlighted within the plan) including flood risk, protection of water quality and biodiversity”. Welsh Government has also stated,

“the Council should ensure no highly vulnerable development is allocated in C2 Flood Plain. Where development is located in zone C1, while the principle of development may be appropriate in national policy terms, the key consideration for the LPA will be to demonstrate that allocations are suitable and deliverable in line with any mitigation measures that may be required to meet the requirements of national policy. The LPA will need to undertake a sufficiently detailed Flood Consequences Assessment (FCA) where appropriate and relevant, and seek advice from the statutory body,

NRW prior to the examination. The authority should keep abreast of the emerging Welsh Government Technical Advice Note 15 (currently subject to consultation) with regards to allocations and the policy framework within the plan”.

- 3.94 These comments are noted. The Council’s Strategic Flood Consequences Assessment will inform the Deposit Plan and advice will be sought from Natural Resources Wales where appropriate. Site promoters will need to support potential strategic allocations with a Flood Consequences Assessment and other key assessments to justify their inclusion in the Deposit Plan.

Proposed Strategic Site Delivery (Deliverability)

- 3.95 Challenges have been made to the deliverability of certain proposed strategic allocations in favour of others and significant commentary has been provided to support or discredit sites identified in the Preferred Strategy and/or Candidate Site Register. Put succinctly, many of these representations question the viability and deliverability of identified sites and suggest certain proposals should be supported ahead of others. Due to the site-specific nature of these representations, further detailed summaries are not provided within the main body of this report, although full representations are available in Appendix 4 for reference.

- 3.96 As stated in the Preferred Strategy document itself (paragraphs 4.4.44 – 4.4.47 refer), the identified Strategic Site Options are theoretically considered to have the potential to underpin the Spatial Strategy by accommodating sustainable housing growth and focusing development within the Regeneration Growth Areas and Sustainable Growth Areas. However, the final selection of sites will be dependent on further detailed assessment work, including:

- The ability to deliver the level of supporting infrastructure required;
- A masterplanning process to ensure they create sustainable, cohesive, well-designed places delivered through a strong placemaking approach; and
- A financial viability assessment to ensure the site is deliverable within the Plan period.

- 3.97 The Preferred Strategy document also makes it clear that site promoters will be expected to submit specific information on the viability and deliverability of sites and failure to do so could affect the prospect of site allocation. The Council will need to have a high degree of confidence that each allocated site has a realistic prospect of being delivered within the LDP period, including whether the site promoter has a serious intention of developing the site. In order to inform the Deposit Plan, a Candidate Site Assessment process will be undertaken, which will gather suitable evidence to robustly demonstrate the viability and

deliverability of each site. Viability assessments will therefore need to be undertaken based on anticipated costs, values and site specific issues (i.e. abnormal costs) whilst also identifying the contribution sites can make to the delivery of infrastructure, affordable housing and other policy requirements. Site promoters will be expected to submit viability information as part of this assessment process and failure to do so may result in the site being discounted from the Deposit Plan. In addition, if the site is a longstanding residential proposal that has been subject to detailed scrutiny as part of ongoing Joint Housing Land Availability Studies, the site will also be discounted unless new evidence is provided to suggest the prospect of delivery has now changed. Sites will also be assessed based on their neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints and opportunities. In addition, there will be an assessment of the policy context, together with the local geographical context, including known infrastructure issues. This will inform development of the housing trajectory.

- 3.98 Wood PLC (on behalf of National Grid) have identified that two of the proposed strategic sites (Island Farm and Parc Afon Ewenni) are, "Crossed or in close proximity to National Grid infrastructure". Accordingly, "High quality and well-planned development in the vicinity of its high voltage overhead lines" is advocated and reference is drawn to the 'A Sense of Place' guidelines. In addition, "National Grid requests that any High-Pressure Gas Pipelines are taken into account when site options are developed in more detail". These comments are noted by the Council.

Infrastructure to Support Growth

- 3.99 A number of respondents cited concerns around supporting infrastructure and the pressure new growth will place on existing settlements. Others have referred to potential strategic sites and shared doubts that they would be able to provide adequate supporting infrastructure.
- 3.100 Merthyr Mawr Community Council have stated, "Consideration must be given to the realistic capacity of travel infrastructure which is afforded by such large developments even taking into account improvements". The Community Council has also referenced air quality impacts and questioned, "What reassurance is there that future developments will be supported by a proper infrastructure which maintains the wellbeing standards of residents?".
- 3.101 Pencoed Town Council has also highlighted the need to improve education facilities and sporting activities, therefore requesting that the Replacement LDP makes provision for a 21st Century School with facilities for sporting activities in Pencoed. Cwm Taf Morgannwg Public Health Team also state how, "It is important that any proposed development supports the provision of an effective

learning environment that meets any potential increase in the demand for school places”.

- 3.102 Furthermore, Natural Resources Wales stress, “When considering infrastructure we consider water resources and drainage arrangements such as provision of sewerage infrastructure to be paramount”.
- 3.103 The Preferred Strategy has sought to identify and differentiate between the sustainability of places by developing a settlement hierarchy; apportioning growth towards settlements that demonstrate strong employment, service and transportation functions. These settlements are therefore considered the most conducive to accommodating growth in a sustainable manner. Planned development will be of an appropriate scale and nature in relation to local housing and employment needs, sympathetic to local character, beneficial to the local community and deliverable with accompanying and identified major infrastructure investment.
- 3.104 An infrastructure capacity assessment will be conducted for strategic sites to identify key infrastructure needs such as education and highways contributions. This process is necessary in order to foster sustainable communities at a scale capable of incorporating a mix of complementary uses (notably a new primary school as a minimum on strategic sites) that enhance communities. Strategic Policy 10 of the Preferred Strategy states that all development proposals should be supported by adequate existing or new infrastructure. This is fundamental in order to mitigate likely adverse impacts and to integrate a development proposal within its surroundings by ensuring reasonable infrastructure provision or financial contributions are provided by developers where necessary. The Council will ensure, through conditions and legal agreements referenced in the Replacement LDP, that the infrastructure is in place to accommodate new developments. As stated in paragraph 5.2.32, “Making active travel for transit and leisure a more attractive prospect will ensure improved health and well-being outcomes in addition to contributing to lower levels of traffic and improvements in air quality”.
- 3.105 Savills (on behalf of Bridgend College) have commented that, “It is encouraging that the Council recognise that increasing housing supply, not only meets housing needs but provides the scale of growth needed to secure investment in infrastructure, facilities and additional benefits for a local community”. With specific reference to the College site in Pencoed, Savills stress, “The College is working with the Council to ensure that improved education provision, leisure facilities and transport links can be delivered as part of the proposed allocation”. Lichfields also emphasise, “When setting policy requirements for infrastructure (including affordable housing), it is therefore vital that the Council considers robust evidence on the costs of infrastructure provision along with reasonable site and development costs”. This is noted by the Council.

- 3.106 The HBF considers that the heading of 'Strategic Policy 10: Infrastructure' is misleading, "As it contains the requirements usually called 'developer contributions'". In addition, "The HBF objects to the wording 'infrastructure should be provided by developers where necessary'". Instead, the HBF suggest utilising the wording, "Mitigate the negative impacts of a development to make it acceptable in planning terms". These comments are noted by the Council and will be considered in development of the Deposit Plan.

Primary Healthcare Provision

- 3.107 Many representors felt existing surgeries were already at capacity and primary healthcare facilities would not be able to accommodate any additional households, particularly doctors' surgeries.
- 3.108 The Council has been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held a year prior to publication of the Preferred Strategy to ensure the broad level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will be maintained with Cwm Taf Morgannwg University Health Board throughout plan preparation. This will be key to service provision planning as the Replacement LDP progresses and more detailed site allocations are proposed within the Deposit Plan.
- 3.109 The Preferred Strategy has also been subject to a Health Impact Assessment (HIA), which is a systematic yet flexible process that assesses the Replacement LDP's potential positive, detrimental and/or unintended consequences for the health and well-being of Bridgend County Borough's population. It also considers potential inequalities and assesses the possible impacts on vulnerable groups within this population. The HIA has provided a set of evidence based recommendations and suggestions to be considered within the LDP development process, which are broadly consistent with priorities identified in the Bridgend Well-being Plan, and have been incorporated into the Preferred Strategy. The findings from the HIA have also been fed back to the Public Service Board. The Council will continue to work with Public Health Wales to ensure health and well-being impacts are considered in the future as the Replacement LDP progresses.

Congestion and Lack of Transport Infrastructure.

- 3.110 A number of representors cited concerns with transport capacity issues, specifically congestion within certain principal settlements.
- 3.111 Merthyr Mawr community Council has commented that, “No thought appears to have been given to car sharing or public transport along the motorway which would require car parking facilities. In reality, given the increasing ability to make flexible and less formal travel arrangements, the ability to park and car share seems like an essential tool in reducing individual car journeys and congestion”.
- 3.112 The Preferred Strategy primarily seeks to direct growth towards settlements with or with easy access to public transport hubs, where there is current or planned infrastructure in place to accommodate the levels of growth required. Whilst the Council cannot ultimately control public transport services, the Council can try to influence such provision by working closely with other bodies. Early conversations have therefore been held with Transport for Wales and there are planned increases in provision to passenger services on the South Wales Mainline. There are also proposals to enhance the Bridgend to Maesteg railway line and the South Wales Metro prospectus indicates that this could potentially include increased frequency of services and enhancement of heavy rail sections of the route, accompanied by other infrastructure improvements to accommodate growth. The planning process can equally have a stronger bearing on other elements of transportation such as provision of Active Travel routes. Sustainable growth in the settlements indicated would necessarily be accompanied by safe walking and cycling linkages alongside green infrastructure to provide logical routes grounded in Active Travel principles. This can help promote more active lifestyles, combat social isolation and provide close linkages to the key places (i.e. employment, education or recreation) residents will need to visit. Indeed, Cwm Taf Morgannwg Public Health Team, “Support the creation of ‘walkable neighbourhoods, where a range of facilities are within walking distance of most residents, and the streets are safe, comfortable and enjoyable to walk and cycle””. It is also suggested that, “Cycle racks and appropriate signage to encourage walking and cycling is also prioritised to support this aim”.
- 3.113 It is however acknowledged that there are site specific transport capacity issues and additional growth will place more pressure on existing roads and junctions. More detailed site assessment work will therefore seek to address transport issues individually before sites come forward through the Replacement LDP. A Strategic Transport Assessment will be conducted to assess how to meet additional demands on the transport network through provision of additional facilities and capacity (for all modes of travel) to satisfy local and more distant travel needs. The Assessment will provide a framework for the transport infrastructure improvements required to support the delivery of sustainable

development in alignment with the Vision and Objectives of the Replacement LDP.

- 3.114 One respondent residing in Pencoed welcomes the Pencoed College Strategic Site, although feels traffic congestion is a major concern. The respondent suggests improving the existing highway infrastructure to accommodate such growth, overcoming the level crossing issue and increasing the level of public transport available. Any development will need provide a comprehensive Transport Assessment and Travel Plan. This will consider all modes of transport in line with the transport hierarchy, and develop a strategy to reduce demand and mitigate transportation impacts caused by any proposal. Additionally, in Pencoed, a moratorium currently exists inhibiting further development to the west of the railway line due to restrictions around the level crossing. Overcoming the level crossing will require intervention and funding from Welsh and UK Government.
- 3.115 Whilst welcoming Background Paper 8 as a start “to identify and address capacity issues at Junction 36”, Savills (on behalf of Lavignac Securities Limited) have commented,

“The report does not include any comparative information between Junction 36 and other similar junctions elsewhere on the motorway network in general or at other motorway junctions within Bridgend or along this section of the M4. This would be useful in considering the extent and uniqueness of the issues that arise at the Junction 36 and whether this in fact does justify the contraction of development opportunity within the Valleys Gateway. Notwithstanding this, Lavignac is pleased to see that there (*sic*) options have been identified to consider how capacity issues may be resolved, and would be pleased to work with the highways authority and the planning authority in order to consider how these might be resolved in the medium to long term”.

- 3.116 These comments are duly noted by the Council and the evidence base will be developed as Replacement LDP process progresses. A Strategic Transport Assessment will be conducted to assess how to meet additional demands on the transport network through provision of additional facilities and capacity (for all modes of travel) to satisfy local and more distant travel needs.

Question 3

The Preferred Strategy is based on Option 4 of the Spatial Strategy Options Document, ‘Regeneration and Sustainable Urban Growth’. This represents a hybrid of the other three options to help realise the regeneration

aspirations and priorities of the Council while balancing the need to deliver future housing requirements for the County Borough. Development is directed to settlements and parts of the County Borough which will benefit the most and where there are opportunities for securing the greatest positive impacts and benefits of growth.

Do you have any comments to make on the preferred spatial strategy?

Spatial Strategy (Supportive Comments)

- 3.117 The Welsh Government is, “Broadly supportive of the spatial strategy and level of homes and jobs proposed, subject to the clarifications”. Natural Resources Wales also, “Agree in principle with your decision to utilise the Regeneration and Sustainable Growth Strategy”. Savills (on behalf of Bridgend College) support the preferred spatial strategy, supporting, “The conclusion made by the Council that additional viable and deliverable sites (including some greenfield sites) are therefore required to ensure that the County Borough’s future housing requirements can be delivered”. DPP agree that “this is the most appropriate approach to delivering the existing proposed growth level”.
- 3.118 The HBF, “Supports the proposed spatial strategy in part”, notwithstanding site specific concerns as previously discussed. RPS (on behalf of Barratt David Wilson) consider that the, “Council’s approach to allocate sustainable urban extensions on greenfield land to sustain existing communities throughout the County is welcomed”, whilst cautioning against relying on brownfield regeneration sites to deliver housing. Barratt David Wilson have stated, “We therefore support the conclusion made by the Council that additional viable and deliverable sites (including some greenfield sites) are therefore required to ensure that the County Borough’s future housing requirements can be delivered”.
- 3.119 Lichfields (on behalf of Persimmon Homes) consider that the “identification of Pencoed as a Sustainable Growth Area is appropriate due to its suitability for logical expansion and its accessible location”. Lichfields also consider that, “The settlement is well-placed to accommodate growth, albeit that the spatial options for growth of Pencoed are extremely limited. Hence, the area of land to the east of the A473 presents the only realistic direction of travel”. Reference is again drawn to the ‘potential further strategic growth at Parc Llanilid’.
- 3.120 DPP (on behalf of Llanmoor Homes) support the identification of Bridgend as the Primary Key Settlement. In addition, Turley (on behalf of Ashfield Land), "Support the emphasis placed on Bridgend as part of the spatial strategy" and comment that, "Bridgend is rightly recognised as being of sub-regional importance". Savills (on behalf of Lavignac Securities Limited) also add that the strategy is a, “Generally appropriate short-term solution to the direction of development in

Bridgend in advance of the preparation of the SDP". Barton Willmore are in agreement that, "Option 4 'Regeneration and Sustainable Growth Strategy' is the appropriate preferred spatial strategy, with a focus on the delivery of underutilised sites and elsewhere greenfield sites". Barton Willmore, "Accordingly support Bridgend as being identified as having capacity for sustainable growth which would benefit from further residential expansion". Land at North East Brackla is referenced as one example of an under-utilised site that could accommodate mixed-use development in this context.

- 3.121 Boyer Planning (on behalf of the Jehu Group) support the designation of Maesteg and the Llynfi Valley as a Regeneration Growth Area, particularly in the context of the land south of Pont Rhyd-y-Cyff. Boyer Planning consider that "delivery within part of the site, such as at land east of Bridgend Road (ID: 325.C1), which has been demonstrated to be both suitable and deliverable as either part of a Strategic Site within the RGA or as a standalone Edge of Settlement site, should not be fettered by the deliverability of the wider site". This is noted by the Council.
- 3.122 Geraint John Planning (on behalf of BPM Technology Corp Ltd) also support the potential strategic allocation within Pont Rhyd-y-Cyff and has provided a high level viability statement in support of Land South of Pont Rhyd-y-Cyff. Geraint John Planning, "Wish to emphasise that the site promoter fundamentally supports the preferred strategy and is committed to ensuring the development site can be delivered and contribute to the wider objective of delivering the strategic opportunity".
- 3.123 These comments are all noted by the Council.

Spatial Strategy (Alternative Viewpoints)

- 3.124 A number of respondents queried why certain settlements have been earmarked to accommodate growth, especially given that many of the same settlements have already been subject to significant development in the recent past. Other respondents feel the spatial distribution should be altered and certain settlements should accommodate more of the proposed growth than others.
- 3.125 It has to be acknowledged that some places have more potential than others to facilitate sustainable placemaking and the scope for settlements to accommodate growth is also dependent on their individual role, function and capacity. Hence, the Preferred Strategy has sought to identify and differentiate between the sustainability of places by developing a settlement hierarchy. This is informed by the conclusions of the Bridgend County Borough Settlement Assessment (2019), which reflects Bridgend's historical and functional settlement pattern and seeks to achieve more sustainable places in a number of ways.

3.126 The Preferred Strategy therefore provides a framework to help realise the regeneration priorities of the Council (notably within Porthcawl and Maesteg / the Llynfi Valley), whilst also apportioning sustainable growth towards existing settlements that demonstrate strong employment, service and transportation functions (Bridgend, Pencoed and Pyle / Kenfig Hill / North Cornelly). This dual faceted approach seeks to broadly balance housing need, economic development and environmental protection and enhancement to allow the County Borough to prosper, simultaneously contributing to the success of the Cardiff Capital Region. Growth will therefore be apportioned to these settlements based on their urban capacities, accessibility, availability of amenities and employment provision (range and quantity) to facilitate sustainable levels and patterns of development, recognising that accompanying infrastructure will also need to be provided.

Spatial Strategy (Valleys Gateway)

3.127 Asbri Planning (on behalf of the JEHU Group) are of the opinion that,

"Whilst the M4 Junction 36 Capacity Background Paper is based on valid evidence, and it is acknowledged that the restriction of further large scale development beyond the settlement limits of the Valleys Gateway settlements may be justified on this basis, it is disputed that there should be a blanket rejection of all sites".

3.128 Asbri Planning have therefore stated, "In the context of the Valleys Gateway, the Preferred Strategy is not in accordance with the Planning Policy for Wales site sequence, in seeking to resist development in a sustainable settlement on sites which meet the provisions of PPW". This statement is categorically incorrect and the Preferred Strategy stringently utilises the site search sequence outlined in Planning Policy Wales. Suitable previously developed land and underutilised sites within existing settlements will be considered in the first instance, before sites on the edge of settlements. As clearly evidenced in Background Paper 8, the capacity issues at Junction 36 prohibit significant additional residential development in the Valleys Gateway, which in turn, impacts upon the suitability of some sites for development in this vicinity. Asbri Planning have requested a definition of, "What may constitute 'further significant growth'" and have suggested retention of sites that constitute under-utilised land within existing settlement boundaries in the Valleys Gateway. An Assessment of Candidate Sites and a Settlement Boundary Review will be conducted to inform the Deposit Plan. However, any new development proposals will also need to be supported by a Strategic Transport Assessment to gauge impacts of additional demands on the transport network.

3.129 Savills (on behalf of Lavignac Securities Limited) have commented that, “It would appear that this issue of capacity at Junction 36 of the M4 is relevant not only to the Valleys Gateway, but also to the Llynfi, Ogmore and Garw Valleys, the road network for all of these being directed through the same motorway junction”. However, this latter statement does not reflect the type of growth promoted in the Valleys areas. The Ogmore and Garw Valleys are identified as Regeneration Areas, which are settlements that would benefit from **community based regeneration** and recognise that a range of localised approaches are required to incite community investment opportunities. Maesteg and the Llynfi Valley is collectively identified as a Regeneration Growth Area in recognition of the fact that larger brownfield regeneration schemes are remaining, acknowledging that longer lead-in times may sometimes be required. However, the sites in Maesteg and the Llynfi Valley are within walking distance of both railway stations and bus routes, thereby promoting active travel opportunities, conducive to PPW’s placemaking principles. The proposal for enhanced services on the Maesteg Line is of particular relevance to the County Borough. Moreover, Maesteg is also considered to have a high level of self-containment. As referenced in the 2019 Settlement Assessment, it is the second largest town in the County Borough, is the main commercial and shopping centre for the Llynfi Valley and benefits from significant employment and manufacturing centres and industrial estates.

Spatial Strategy (Pyle, Kenfig Hill and North Cornelly)

3.130 Boyer Planning (on behalf of Llanmoor Homes) also support, “The status Bridgend is attributed within the PS and agree that it should be the primary focus for residential development”. However, whilst “recognising the sustainability credentials of the grouped settlement of Pyle, Kenfig Hill and North Cornelly”, the scope for this area to accommodate a substantial quantum of new homes is doubted. Boyer Planning reference the fact that this area “has not been subject to much development in recent years” and question developer interest and sales values. The suggestion is to reduce the proportion of growth allocated to this settlement, with “any surplus created attributed to Bridgend as the most sustainable settlement in the Borough, with a proven track record of housing being delivered”. In another representation (on behalf of Bellway Homes), Boyer Planning state, “There is only one strategic site option for the settlement, which the evidence base suggests is subject to major environmental / deliverability constraint”.

3.131 Conversely, Asbri Planning (on behalf of the Jehu Group) support, “The identification of Pyle, Kenfig Hill and North Cornelly as a Main Settlement and Sustainable Growth Area”. Equally, Barton Willmore (on behalf of South Wales Land Developments Ltd), “Support Pyle as being identified as having capacity for sustainable residential growth which would benefit from further housing

development". Geraint John Planning also, "Agree with the proposed growth area for Pyle, Kenfig Hill and North Cornelly and welcome development within these areas".

- 3.132 Geraint John Planning have also made a further representation on behalf of all parties with an interest in the Land East of Pyle, confirming that, "A coordinated and comprehensive approach to the development of this site is being pursued, with active dialogue and liaison having taken place with all parties in order to advance the opportunity". A range of studies have already been completed to support the site's allocation, including a preliminary landscape and visual appraisal, an initial ecological appraisal, a desktop archaeological assessment, a flood risk statement, a transport study, an active travel plan and an illustrative site masterplan. Geraint John Planning have therefore confirmed that there has been a, "Significant level of work undertaken to-date to support the site's promotion" and, "All the landowners within the Regeneration Area are committed to ensuring the development site can be delivered". The Leaders Romans Group have also referenced this "Comprehensive suite of report and surveys", together with the fact that, "Strategy meetings have begun to assist with the delivery of a logical and comprehensive scheme, with all necessary highways and infrastructure requirements" for the Land East of Pyle. It is also stated that, "The land's very location will mean significant interest from the development industry, and this is reflected by the number of approaches that our client (and indeed as reported by Geraint John Planning for their client's land) has received". The Leaders Romans Group therefore support the allocation as a sustainable urban extension and state, "Our clients will work with the adjacent landowners, and our intention is that we will market the land during 2020 to seek a suitable development partner".
- 3.133 Notwithstanding these site-specific points, the spatial strategy has been informed by the 2019 Settlement Assessment, Background Paper 3 and the Local Housing Market Assessment. A number of representors have sought clarity on why certain sites have or have not been identified in the Preferred Strategy, although this is clearly specified in paragraph 4.4.45 of the Preferred Strategy document itself. Only major Regeneration Sites together with potential Sustainable Urban Extensions (capable of delivering 1,000 homes or more based on an indicative density of 35 dwellings per hectare) were identified within the respective Regeneration Growth Areas and Sustainable Growth Areas. Moreover, it should be re-emphasised that all candidate sites will be assessed as part of the Candidate Site Assessment Procedure, which will be used to inform the Deposit Plan. Potential strategic sites will also be subject to a detailed assessment of delivery, phasing, infrastructure requirements and viability to both inform and support the Deposit Plan.

Regeneration Growth Areas

- 3.134 A significant number of representors supported the brownfield led strategy for Porthcawl and its designation as a Regeneration Growth Area. Supportive comments referred to the central location of the waterfront site, combined with its existing infrastructure, transport links and retail provision. It was felt that brownfield growth in this area would boost the profile of the Town Centre, attract a younger population base to the area and increase footfall for retailers. This was deemed to be preferable to building new homes on the outskirts of the town; an approach that was negatively perceived by a number of local residents due to environmental implications and the loss of green areas and habitats.
- 3.135 However, a number of commentators submitted representations with differing opinions. LRM Planning (on behalf of Taylor Wimpey), "Supports the Council's intention to achieve sustainable growth by channelling development towards settlements that already benefit from significant services, facilities and employment opportunities". Particular support is given to "the designation of Porthcawl as tier 2 Main Settlement" and the, "Intention to maintain Porthcawl as a priority area for regeneration". Reference is also made to the importance of identifying deliverable sites to, "Ensure the successful execution of the strategy".
- 3.136 Lichfields (on behalf of Taylor Wimpey) elaborate on this point in relation to Porthcawl by suggesting, "Consideration should be given to allocating sustainable sites on the edges of Regeneration Growth Areas in recognition of the key roles of these hubs in spreading prosperity to surrounding communities". Lichfields also emphasise, "The important contribution that greenfield sites adjacent to the Regeneration Growth Area boundary can make in meeting the identified housing need for Porthcawl in the short term".
- 3.137 Boyer Planning, "Do not consider that Porthcawl has been appropriately categorised within the proposed spatial strategy", on the basis that it, "Is predicated on the proposed rollover of the Porthcawl Waterfront Regeneration Site allocation from the existing to the Replacement LDP". Attention is also drawn to the varying documented capacities of this site, although capacities are indicative at this stage and will be subject to a refreshed master planning exercise. Boyer Planning therefore conclude, "We consider the town should be identified as a sustainable growth area in addition to its status as a regeneration growth area in the LDP".
- 3.138 Barratt David Wilson feel that if Porthcawl was re-designated in this manner, it would allow, "The opportunity and flexibility to include a mix of housing sites in and on the edge of the settlement to deliver the necessary amount of growth". Barratt David Wilson are also of the option that, "The need for greenfield release

needs to be extended to Porthcawl”, citing deliverability concerns regarding the Waterfront Regeneration Site (based on the site’s past history).

- 3.139 The Leaders Romans Group also, “Do not consider that Porthcawl has been appropriately categorised within the proposed spatial strategy”, based on, “serious concerns over the delivery of the Porthcawl Waterfront site within the plan period”. It is instead argued that, “We consider the town should be identified as a sustainable growth area in addition to its status as a regeneration growth area in the LDP”.
- 3.140 LRM Planning (on behalf of Taylor Wimpey) also consider that, “There are fundamental technical and viability issues to be overcome prior to the delivery of this site. It cannot be relied upon for delivery and should not form part of the supply absent any evidence to the contrary”.
- 3.141 WYG Environment Planning Transport Ltd (on behalf of Persimmon Homes West Wales) support the preferred spatial strategy, “As a suitable and sustainable growth strategy for the County Borough over the replacement plan period”, although suggest amending the designation of Porthcawl to a Sustainable Growth Area. This is, “Considered appropriate and will provide flexibility to achieve the provision of housing within the Waterfront Regeneration Area but not to the detriment of effectively stunting housing growth within the ‘main settlement’ of Porthcawl”.
- 3.142 The preferred spatial option underpinning the Preferred Strategy seeks to prioritise brownfield regeneration with Porthcawl through the regeneration of its waterfront, which is clearly defined within Objective 1d. Porthcawl is therefore designated as a Regeneration Growth Area. Paragraph 4.48 states, “Regeneration Growth Areas constitute settlements that would benefit from appropriate growth to address a broad range of socio-economic issues **within their vicinity**, whilst demonstrating capacity to accommodate that growth in a sustainable manner” (emphasis added). The spatial boundary is expected to follow the respective settlement boundary for Porthcawl, subject to definition at Deposit Stage, and paragraph 4.48 clearly states, “A number of (primarily brownfield) sites in need of redevelopment and investment will be earmarked **within these Areas**” (emphasis added). Paragraph 4.4.10 goes onto to specifically highlight the redevelopment of Porthcawl’s Waterfront as the means of revitalising the broader settlement. Therefore, significant growth on greenfield sites at the edge of Porthcawl does not accord with the preferred spatial strategy (see also Background Paper 3: Spatial Strategy Options).
- 3.143 Instead, the major regeneration project, on the town’s waterfront, will provide the strategic focus of residential-led growth and opportunity for Porthcawl by maximising the benefits of the unique location that incorporates views across

Sandy Bay. The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising flood defences, enhanced active travel links plus education, retail and community facility provision. The project area is closely linked to the town centre, which will continue to benefit from environmental improvements. The deliverability and viability of all strategic sites will be assessed to inform the Deposit Plan.

Link between Spatial Strategy and Local Housing Market Assessment

- 3.144 The Welsh Government has referred to the 2019/20 LHMA, commenting, “The plan has considered a number of growth and spatial options yet there is no discussion or conclusion on how these options have been informed by findings in the LHMA”. The Council notes these comments and acknowledges that improved commentary needs to be made within the Deposit Plan and background papers to explain how the need identified in the LHMA has informed the growth and spatial options. It should however be stressed that the LHMA identified housing need across the whole County Borough, the highest of which being within Bridgend itself (142 units per annum). This evidence, combined with the 2019 Settlement Assessment and Background Paper 3: Spatial Strategy Options, led to Bridgend being identified as the Primary Key Settlement within the Preferred Strategy. Equally, the LHMA identified high need within and informed classification of the other Main Settlements in the Preferred Strategy (including the grouped settlement of Pyle, Kenfig Hill and North Cornelly, Pencoed and Porthcawl).
- 3.145 Welsh Government state, “The Deposit plan should clearly explain how the level of affordable housing need in the LHMA has influenced the scale and location of growth in the plan. It is essential the authority demonstrates it has maximised affordable housing delivery to meet Key Issues and Objectives”. The Preferred Strategy’s proposed spatial distribution of growth has implicitly been developed to maximise affordable housing delivery in high housing need areas based on the findings of the LHMA. However, although the Council recognises that these linkages need to be made more overt within the Deposit Plan to more clearly demonstrate this very point.
- 3.146 Welsh Government also referenced the fact that, “No broad level affordable housing viability assessment has been submitted to support the Preferred Strategy. It is therefore unclear how viability has informed the plans spatial distribution and the scale of housing sites”. This comment is duly noted by the Council. An affordable housing viability study will be prepared to support and inform the Deposit Plan and the broad percentages of affordable housing residential sites will be expected to deliver across the County Borough.

Question 4

The policies in this section relate to design and sustainable place making.

Do you have any comments to make on the related policies within this section?

Design and Sustainable Place Making

- 3.147 A number of comments have been made in relation to Strategic Policy 2: Design and Sustainable Place Making.
- 3.148 Savills (on behalf of Bridgend College), “Broadly agree with the principles and ambitions that they [the design and sustainable place making policies] promote”. Cwm Taf Morgannwg Public Health Team also support Strategic Policy 2 and 5 in relation to integrating active travel routes and green infrastructure networks to incite creation of a high quality environment.
- 3.149 Barratt David Wilson link the four strategic policies, “Which together relate to design, placemaking, climate change, transport, and active travel”. Barratt David Wilson do not consider these policies to be contentious, although feel that they, “Effectively repeat guidance contained within PPW...and accordingly are superfluous and could be removed”.
- 3.150 The HBF has requested clarity on whether, “All developments are required to comply with all of the listed criteria”, and feel, “in reality this will not be the case so the fact criteria will be applied where relevant needs to be included in the wording of the policy”. Similar comments have been provided by RPS (on behalf of Barratt David Wilson). The HBF also consider that references to Design and Access Statements should be removed from the supporting text, as, “The requirement for the contents of these is set out by national guidance, it is not for an LDP to change the content required within them”. This sentiment is also echoed by RPS (on behalf of Barratt David Wilson).
- 3.151 Lichfields (on behalf of Taylor Wimpey) are of the opinion that references to design of ‘the highest quality possible’ is, “Highly subjective and should not be applied in LDP policy”. Lichfields therefore recommend that, “The emerging LDP should simply require that development is of *“high quality”*, thereby affording discretion to decision makers in their assessment of development proposals”. Lichfields also feel that criterion 11 is, “Overly prescriptive” in requiring all developments to prioritise the use of locally sourced construction materials and secondary recycled aggregates or materials before using primary materials. Instead, “Taylor Wimpey therefore considers that this draft text should be

amended to state that developers should demonstrate the use of circular economy principles”.

- 3.152 Furthermore, Lichfields (on behalf of Taylor Wimpey) have stated, “Point 12 requires all development to ensure that the viability of neighbouring uses and their users/occupiers is not adversely affected. It is not clear how this would be assessed and we therefore propose reference to viability should be deleted”.
- 3.153 South Wales Police have commented that, “No mention is made in the document of community safety, Designing out Crime or Secured by Design, which are commented on in Welsh Government Documents Technical Advice Note 12 and Design and Access Statements in Wales April 2017”. It is therefore requested, “That these topics be included in next year’s Deposit Plan”.
- 3.154 Savills (on behalf of Lavignac Securities Limited), “Supports sub-policy 4 (3) that prioritises the delivery of the key transport measures and schemes identified in the Bridgend Local Transport Plan including the resolution of capacity at Junction 36 of the M4”.
- 3.155 Welsh Water, “Welcome the provision of criterion 13 of Strategic Policy 2”, commenting that, “adequate capacity within the public sewerage and water supply networks are key to ensuring new development sites are sustainable and deliverable”.
- 3.156 The Councils notes and welcomes all of these comments and will consider them in more detail as policy wording is developed prior to publication of the Deposit Plan.
- 3.157 More broadly speaking, Merthyr Mawr Community Council have stated, “The aim should be for high levels of energy efficiency as possible”. The Community Council recommend that the Local Planning Authority should, “Insist that all homes are insulated to the highest standard”, and, “the building of passive houses as standard should be obligatory for developers”. Similarly, a local resident has suggested including a policy that requires all new homes to be, “Built to zero carbon standards and at the very least that no new housing estates are to have gas supplies”. Furthermore, the same resident suggests, “New housing should be built to standards higher than existing building regulations, in order to ensure new homes will be energy efficient”. While the Council is committed to high quality design and standards of homes and the Replacement LDP will strive to achieve these standards, an improvement in standards would also require a change in building regulations to come into effect.
- 3.158 Merthyr Mawr Community Council are also, “Concerned that strain on the waste water and sewage capacity be fully taken into account to include the effect of

road run off into local rivers and the consequent effects on the riverine ecosystem". Correspondingly, Welsh Water have commented,

"Ensuring there is sufficient capacity within the public sewerage system is an important element in protecting and enhancing the natural environment, whilst along with an adequate potable water supply and drainage infrastructure (including sustainable drainage systems) is key to ensuring new development sites are sustainable, viable and deliverable. As such, we welcome the provision of SOBJ 4 and its constituent specific objectives, in particular OBJ 4c".

3.159 However, Welsh Water do note that, "There is no reference within the Preferred Strategy to the recently established SuDS Approval Boards (SABs), as set out in the Flood and Water Management Act 2010 (Schedule 3)". This is deemed important as,

"The requirement for new developments to obtain SAB consent may result in layouts and densities changing in some housing developments, but the onus is on landowners/developers to consider SuDS prior to master planning their site which will ensure there is no need to retrofit schemes into the design at a later stage".

3.160 In addition, Welsh Water have referenced the fact that they are embarking on Drainage and Wastewater Management Plan, which will become statutory documents in the near future, and would therefore, "Welcome a mention of the DWMP within the LDP if possible".

1.161 All detailed comments within this section are noted by the Council and will be considered in development of the Deposit Plan.

Mitigating the Impact of Climate Change

3.162 In relation to Strategic Policy 3, Merthyr Mawr Community Council have stated that,

"The use of the word "mays" at the top of this list makes it appear like no more than good intentions which can be easily overturned or ignored. If climate change is to be addressed then teeth and a strong planning backbone rather than good intentions are essential".

Conversely, both the HBF and RPS (on behalf of Barratt David Wilson) are of the opinion that, "Not all developments will be able to achieve all the listed criteria" and, "it is not for new development to help solve the existing problem". Both representors feel that this policy should be reworded so that new development,

“Should try not to make it any worse and can be required to deal with any direct impact as a result of the development”.

3.163 Lichfields (on behalf of Taylor Wimpey) reference criterion 1 and state that Taylor Wimpey’s developments follow the approach of reducing energy demand and promoting energy efficiency. However, Lichfields state the policy, “Should not specify a minimum requirement for a proportion of energy demand to be covered by these technologies as this might give rise to viability pressures that may undermine the deliverability of new development”.

3.164 Welsh Water, “Welcome the inclusion of criteria 6” and state that, “minimising pollution from wastewater is something that we strongly believe in and adhere to”. In addition, criterion 7 is also welcomed by Welsh Water, and it is stated that,

“Disposing of surface water in a sustainable manner will ensure that it will not communicate with the public sewerage network, thereby having the effects of not only protecting the environment and reducing flood risk, but also ensuring there is sufficient capacity in the public sewerage network for foul-only flows from development sites”.

3.165 These comments are noted by the Council and will be considered in development of the Deposit Plan.

Active Travel

3.166 Lichfields (on behalf of Taylor Wimpey) cite broad support for Strategic Policy 5: Active Travel, subject to the tests of necessity.

3.167 The HBF are “Supportive of the principles”, although feel, “Much of the improvements suggested by the policy will be off site and not in the control of the developer or often the Council, making implementation difficult if not impossible”. The HBF go on to cite viability issues and the need for these to be recognised. It is stated, “Further such requirements are very difficult to cost at the early stages of a land purchase and can often be very costly particularly where third party land is involved, running the risk of a ransom situation”. Barratt David Wilson also reference this point by stating, “The impact on viability should be recognised within the policy wording or supporting text.” These comments are duly noted by the Council.

Question 5

This section of the Preferred Strategy focusses on meeting housing needs in accordance with the site sequence outlined in Planning Policy Wales, and ensuring that new development is supported by necessary and adequate infrastructure.

Do you have any comments to make on the related policies?

Site Typology

- 3.168 A number of representors have commented on the site typologies detailed in the Preferred Strategy in terms of their impact, suitability and/or definitional status.
- 3.169 Welsh Water has made three key points in this respect. Firstly, brownfield sites are deemed, “Generally more likely to result in less water and sewerage constraints than a greenfield approach, though this is location dependant”. Secondly, “Strategic sites of between 1,000 and 2,000 dwellings will invariably require water and sewerage infrastructure improvements which may need to be funded by developers if the sites are to progress in advance of potential regulatory investment”. Thirdly, once identified, Welsh Water, “Will be able to determine whether there is sufficient capacity within the water and sewerage networks to accommodate the growth proposed” in relation to edge of settlement sites. The Council notes and welcomes these comments and will ensure ongoing engagement with Welsh Water as the Replacement LDP progresses.
- 3.170 Lichfields (on behalf of Persimmon Homes) endorse the proposed approach of the Preferred Strategy in terms of locating development “On brownfield land where possible and on sustainable sites with access to a range of services, thereby reducing the need to travel”. However, the need to consider viability and deliverability is also stressed. This will undoubtedly be considered by the Council to inform the Deposit Plan. Lichfields (on behalf of Taylor Wimpey) also consider that “the emerging LDP should allocate housing sites in locations within and on the edge of existing settlements with good access to services”. Barratt David Wilson broadly consider that, “The commentary in the Preferred Strategy in relation to Site Typography is useful as it adds clarity on the type of sites which may be considered compatible with the Strategy”, whilst advocating an allowance for edge of settlement sites. This is deemed important, “In order to relieve some of the pressure” on housing land supply, with specific reference to Porthcawl. The site typology and justification for different approaches in different settlement is detailed in paragraphs 4.4.17 - 4.4.43 of the Preferred Strategy and Background Paper 3: Spatial Strategy Options.
- 3.171 Whilst Geraint John Planning recognise the potential strategic sites to the East of Pyle and Pencoed College Campus, “Will certainly help to deliver the projected

housing target for BCBC”, smaller complementary allocations are promoted within Kenfig Hill and Pencoed, respectively. Put succinctly, Geraint John Planning, “Consider there to be a need for smaller sites to be allocated which can deliver housing over a shorter term”. Boyer Planning (on behalf of Bellway Homes) argue that, “The LDP should not be too heavily reliant on strategic sites to meet the identified housing requirement”, instead advocating a range of allocations. Equally, DPP advocate providing a range of sites, including the use of Edge of Settlement Sites, stating, “Small sites can be delivered relatively quickly, often without large upfront capital investment, and can therefore make a significant cumulative contribution to overall annual housing completions”. Furthermore, RPS (on behalf of Barratt David Wilson) consider that, “A good spread of sites of a meaningful scale (250+) together with larger sites (1000+) minimise the risk of sites not being deliverable”. In response to these points, it should be noted that the Preferred Strategy, “Only identifies major Regeneration Sites and Sustainable Urban Extensions (capable of delivering 1,000 homes or more based on an indicative density of 35 dwellings per hectare)” (para 4.4.45 refers). It is fully acknowledged that a range of sites will be required to deliver the Replacement LDP’s housing requirement successfully and these will be identified in the Deposit Plan, subject to the Candidate Site Assessment process. Indeed, Barratt David Wilson have cited support for, “The inclusion of non-strategic housing sites within Strategic Policy 6 of the Preferred Strategy”.

- 3.172 A number of comments have also been made on the site typologies identified in the Preferred Strategy. Boyer Planning (on behalf of Bellway Homes) have argued against the rigid application of 150 units to edge of settlement sites, stating, “Whether or not a site will impact negatively on existing local infrastructure is entirely reliant on the site specific situation and attributing a ‘one catch fits all’ threshold is not considered appropriate”. Instead, Boyer Planning are of the opinion that, “Each site should be considered on its merits as to whether there is sufficient supporting infrastructure, or if there is insufficient supporting infrastructure whether the site can provide the necessary mitigation / contributions”. Savills (on behalf of Bridgend College) recommend that, “An additional type of site is included in the Deposit Plan for strategic sites over 150 homes, but not defined as SUEs”. Savills cite concerns that, this approach could, “Risk otherwise sustainable sites suitable for development not being allocated in the plan”. Reference is also made to the fact that Bridgend College does not fall neatly into one of the defined site types. DPP (on behalf of Edenstone Homes) have also referenced the 150 unit restriction, stating that, “Such a number on one of the smaller settlements in Bridgend may well result in a substantial impact in infrastructure terms, however, on others there may be scope to absorb more than 150”. DPP add that, “Whilst some justification is provided within the PS in respect of the 150 figure, some flexibility should be afforded here to allow a great number – potentially up to 200, where it can be demonstrated that more dwellings can be

absorbed by the settlement". In addition, RPS (on behalf of Barratt David Wilson) state, "Smaller sites of say 250 plus homes can still deliver improvements to existing infrastructure and/or provide new supporting infrastructure and they have the benefit of being able to make a contribution to housing supply in the short term". The Leaders Romans Group argue that, "Planning conditions, obligations via Section 106 agreements and Community Infrastructure Levy (CIL) are the established method of ensuring that development appropriately contributes to new or improved infrastructure, regardless of scale or the amount of development". On this basis, it is considered that, "The figure should not be used in the assessment of candidate sites and each site should be considered on its merits as to whether there is sufficient supporting infrastructure, or if there is insufficient supporting infrastructure whether the site can provide the necessary mitigation / contributions".

- 3.173 The rationale for this approach is clarified in paragraph 4.4.39 of the Preferred Strategy, which states, "Sites that are larger than 150 homes are often not of a significant enough scale to deliver supporting infrastructure and thereby have the potential to impact negatively on local communities by exacerbating localised problems". However, it is further clarified that, "Sites of this scale will only be considered where it can be clearly demonstrated that there is capacity to accommodate the respective level of growth within the settlement and/or necessary facilities and infrastructure improvements are provided in support of the development". Several representors consider this approach contradictory to having a 150 unit threshold in the first instance and have therefore suggested utilising this latter approach to determine the suitability of edge of settlement sites. These comments are noted by the Council and this issue will be further considered in development of the Deposit Plan.

Exception Sites

- 3.174 Representations have been made supporting the inclusion of an Affordable Housing Exception Site policy, although objecting to the 10 unit 'cap' proposed. Geraint John Planning have submitted responses on behalf of both Valleys to Coast and Pobl to this end, suggesting removal of the wording 'Affordable Housing Exception Sites will comprise of no more than 10 units, which is the appropriate size for a sustainable cluster of affordable units'.
- 3.175 In order to support this suggestion, the weight attached to meeting a community's need for affordable housing (as a material planning consideration detailed in Planning Policy Wales) is referenced. In addition, the need to include a range of policy approaches (detailed within TAN 2) to meet an authority-wide target for affordable housing is highlighted. Emphasis is also placed on Planning Policy Wales' requirement to consider affordable housing exception sites where

appropriate, which are to constitute “small housing sites within or adjoining existing settlements for the provision of affordable housing to meet local needs which would not otherwise be allocated in the development plan”, which is, “An exception to the policies for general housing provision”.

3.176 The Council considers that the proposed Affordable Housing Exception Policy wording is categorically compliant with both Planning Policy Wales and TAN 2. This policy will constitute a supplementary means of contributing towards the affordable housing requirement that will be identified in the Deposit Plan. The affordable housing requirement will be based on both the housing need identified in the Local Housing Market Assessment and a forthcoming affordable housing viability study.

3.177 However, the primary argument posed by Geraint John Planning is that, “It is clear that national planning policy supports the extension of existing settlements where developments would meet a local need for affordable housing”. Paragraph 3.56 of PPW is then quoted with added emphasis,

“Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, **in particular where they meet a local need for affordable housing** or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a **scale and design that respects the character of the surrounding area**” (GJP emphasis).

3.178 The proposed policy is not out of accord with this paragraph, and, on the contrary, would facilitate delivery of small affordable housing schemes by Registered Social Landlords within or adjoining existing settlements in the countryside. As paragraph 4.4.41 of the Preferred Strategy states, “Whilst the Council’s preference is for development to take place within the defined settlement boundaries, exception sites recognise that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner”. Therefore, an exception for small sites to come forward would facilitate these aims, acknowledging that 10 units is an appropriate size for a sustainable cluster of affordable units. This is considered to be of an appropriate scale as detailed in paragraph 3.56, in recognition of the fact that larger sites can otherwise become increasingly uncondusive to the delivery and maintenance of a balanced, mixed tenure community. It should be emphasised that individual clusters of more than 10 affordable units would not normally be

appropriate on private developer sites and therefore it is highly questionable why larger clusters should be considered appropriate in the countryside.

3.179 Geraint John Planning also quote the Minister for Housing and Local Government's Letter, again with added emphasis,

"The most recent version of PPW, published last December, requires local planning authorities to follow place-making principles. Place-making is a people-centred approach to planning, designing and managing communities to promote peoples' health, happiness and well-being which must be central to preparing LDPs and deciding planning applications. PPW already allows local planning authorities to identify sites for up to 100% affordable housing. **Whilst PPW also states that such sites are likely to be small in scale and number in relation to the total number of sites available, the need for social housing is now so acute that this policy needs to be implemented in a flexible way to reflect local circumstances.** PPW will be updated to reflect the revised policy as part of the current review of the delivery of housing through the planning system." [GJP emphasis].

3.180 However, this letter does not specifically refer to affordable housing exception sites, which are considered exceptions to general housing provision by their very nature and would therefore not be specifically allocated within the Plan. The potential for 100% affordable housing site allocations will nevertheless be considered for inclusion in the Deposit Plan as informed by the forthcoming affordable housing viability study and the 2019/20 Local Housing Market Assessment. These allocations are, however, a separate consideration to affordable housing exception sites specifically.

3.181 Finally, a range of alternative affordable housing exception site policies from neighbouring authorities are also summarised by Geraint John Planning. Reference is made to exception site policies in Neath Port Talbot (9 units and below, which is subject to review), the Vale of Glamorgan (generally 10 or fewer dwellings, although more than 10 dwellings may be acceptable subject to criteria) and Swansea (criteria based according to local needs). Geraint John Planning therefore suggest, after reviewing these policies, "It becomes apparent that there are other viable options to improve the number of dwellings allocated on Affordable Housing Exception Sites". However, in all cases, these policies have been developed to address locally identified needs, viability and different geographical contexts. Geraint John Planning do not reference the exception site policy in Rhondda Cynon Taf, which, as found in recent RTPi research (January 2019), "Is significantly more than most other policies" at 30 units. Nevertheless, this policy has not delivered substantial numbers of affordable units under the existing LDP, which shows that greater flexibility on unit numbers is not solely

conducive to additional affordable housing delivery through an exception site policy. This argument is therefore not considered to be one that justifies removing the 10 unit criteria attached to the proposed policy.

- 3.182 Ultimately, the Affordable Housing Exception Site policy is intended to be a supplementary means of meeting the need identified for affordable housing in the Local Housing Market Assessment. The Council has proactively sought to introduce this policy into the Replacement Plan and it is considered one of several means of meeting the County Borough's need for affordable housing that will be identified in the Deposit Plan. This policy will support site-specific targets and thresholds, informed by an affordability housing viability study. In addition, a settlement boundary review will be conducted to enable a range of small and windfall sites to come forward, which could include RSL led schemes in addition to self-build, custom build and co-operative housing. The plan will seek to deliver the vast majority of affordable housing **within the designated settlement boundaries** in accordance with placemaking principles. Promotion of significant levels of development in the countryside (affordable housing or otherwise) is not considered conducive to this aim. None of the arguments posed by Geraint John Planning (on behalf of Valleys to Coast and Pobl) are considered sound justification to remove the 10 affordable unit limit proposed for exception sites in the countryside. The aim of this policy, as referenced in paragraph 4.4.41 of the Preferred Strategy, is to "provide a means of delivering affordable housing in areas where it may otherwise prove difficult to meet housing need".
- 3.183 Correspondingly, DPP consider that "affordable housing exception sites of 10 dwellings or less could make a meaningful contribution towards housing numbers", although state that, "No indication is made within the PS as to the expected contribution AH exceptions sites will make to the overall housing delivery number". However, as referenced above, this policy is not intended to make a significant contribution to housing numbers, only provide a mechanism to address need for affordable housing in exceptional circumstances.
- 3.184 On behalf of Taylor Wimpey, Lichfields object to the wording in Strategy Policy 6, which states, "There will be a presumption against housing development in all areas outside defined settlement boundaries, unless the proposal is considered an appropriate exceptional case". Lichfields suggest that, "This statement conflicts with the provision at Point 2 that allows for Non-Strategic Housing Sites at the edge of established settlements. It should therefore be deleted".
- 3.185 The Council does not consider this a conflict. Criterion 2 (which states, "Create new Sustainable Urban Extensions (SUEs) on the edge of established settlements") would constitute allocations at the edge of existing settlements, although within amended settlement boundaries in accordance with the preferred spatial strategy. However, the supporting text referenced by Lichfields refers to

development outside of defined settlement boundaries. Lichfields argue that, “Draft Policy SP6 and the accompanying text should clarify that the “edge of established Settlements” includes sites that are in close proximity to these settlements but may not necessarily adjoin the existing settlement boundary in the adopted LDP”. However, this would be out of accord with the Preferred Strategy and broader sustainable placemaking principles. Market housing will not be not permissible outside of settlement boundaries, only small affordable housing sites through the Exception Site Policy.

Housing Balance Sheet

- 3.186 Lichfields (on behalf of Persimmon) have stated, “It is appropriate that a substantial portion of growth is channelled towards Pencoed, given its position in the second tier of the settlement hierarchy and its capacity to sustainably accommodate growth”.
- 3.187 However, Lichfields have also stated (on behalf of Taylor Wimpey) that, “Porthcawl is missing from this list of potential areas for new allocations”, considering that “this omission is not aligned with the Preferred Strategy or with national policy and should be rectified”. Whilst new allocations are not identified in Porthcawl specifically, the Housing Balance Sheet should be considered as a whole. A significant level of growth is allocated on the Porthcawl Waterfront Regeneration Area Site as a ‘Rollover’ Allocation, informed by the preferred spatial strategy.
- 3.188 Lichfield feel, “This approach focuses development on one area that has not yet been delivered” and a number of other commentators have questioned the delivery of Porthcawl Regeneration Area and Parc Afon Ewenni. DPP have also cautioned against over-reliance on regeneration sites, “To ensure that the numbers proposed are achievable”. This is echoed by RPS (on behalf of Barratt David Wilson), who advise against relying on housing-led regeneration sites as part of the overall housing supply, considering that this approach, “Could seriously prejudice achieving the development plan housing requirement”. LRM Planning (on behalf of Taylor Wimpey), also argue that, “The Porthcawl Regeneration Area site should be removed as an LDP ‘Rollover’ Allocation as outlined on the Housing Balance Sheet within the Preferred Strategy (Table 6) and allocated as a ‘bonus site’”.
- 3.189 However, as clearly stated in paragraph 5.3.11 of the Preferred Strategy, the Housing Balance Sheet “Is indicative at present, using a base date of 1st April 2019, and will be refined as the Plan progresses”. This will also be informed by an assessment of the deliverability and viability of sites to inform the Deposit Plan. As Welsh Government state, “Demonstrating delivery of the strategy, strategic sites and ‘rolled forward’ allocations will be critical and this should be

supported by your authority's evidence in the Deposit plan". In addition, Welsh Government state, "The Deposit plan must be underpinned by viability work, an infrastructure plan and a robust housing trajectory included in the plan appendix". These comments are considered to be of paramount importance by the Council and were always intended to be factored into the development of the Deposit Plan.

- 3.190 Boyer Planning have quoted the capacity of the Land East of Pyle and stated that there is, "A contradiction within the PSCD regarding the level of growth required and the capacity of the strategic site being considered". However, as clarified in paragraph 5.3.14 of the Preferred Strategy, proportional growth has been indicated, "Considering all strands of housing supply collectively (i.e. extant completions, land bank commitments, small site projections, windfall site projections and new allocations)". The indicative growth levels per settlement are therefore not fixed and will be subject to further refinement in the Deposit Plan.

Greenfield Development Concerns

- 3.191 Several representors have questioned why certain greenfield sites are being considered for development and suggested pursuit of a 'brownfield' only strategy instead. Specifically, Merthyr Mawr Community Council has questioned, "The policy of building large developments on greenfield sites in order to pay for the schools and infrastructure which consequent population growth increase necessarily demands". Concerns have also been shared by the Community Council, "That such large developments can run counter to many of the placemaking principles set out in PPW". A local landowner has also commented, "New, large scale green field developments inevitably put significant pressure on the adjoining countryside, the more so, where the adjoining countryside is of high natural and historic value".
- 3.192 Planning Policy Wales specifies a well-defined search sequence to identify development land. Sustainable previously developed land and/or underutilised sites within existing settlements should be reviewed first before suitable, sustainable greenfield sites within or on the edge of settlements are then considered. The overall aim of the Preferred Strategy is therefore to prioritise the development of land within or on the periphery of urban areas, especially on previously developed 'brownfield' sites. Porthcawl, Maesteg and the Llynfi Valley will therefore continue to remain regeneration priorities through their designation as Regeneration Growth Areas. This will enable delivery of a range of mixed-use developments and facilities, accompanied by more community based Regeneration Areas within the Ogmre and Garw Valleys. However, given the existing LDP's success in delivering development on brownfield land in other settlements, further regeneration opportunities are now somewhat limited. The Preferred Strategy therefore proposes to allocate additional viable and

deliverable sites (including some greenfield sites) in order to ensure the County Borough's future housing requirements can be delivered. For these reasons, accompanying growth will be channelled towards Bridgend, Pencoed and Pyle/Kenfig Hill/North Cornelly in recognition of their positions in the Settlement Hierarchy and capacity to accommodate growth in a sustainable manner. Designation of these settlements as Sustainable Growth Areas will provide a means of supporting their existing services and facilities, enabling delivery of associated infrastructure and capitalising upon their location on the strategic road and rail network, promoting transit orientated development.

- 3.193 Ultimately, the Preferred Strategy stringently follows the site search sequence outlined in Planning Policy Wales and seeks to achieve a broad balance between housing, community facilities, services and employment opportunities to minimise the need for long distance commuting. There is still a strong presumption in favour of brownfield development where possible, whilst acknowledging a limited number of sustainable greenfield sites on the edge of settlements are also required to ensure delivery of the County Borough's future housing requirements. Barton Willmore support this approach, particularly prioritisation of under-utilised sites for residential development.

Delivery of Affordable Housing for Local Households

- 3.194 A number of respondents cited concerns over inadequate affordable housing provision and queried whether the Replacement LDP will seek to help address this issue through private developer contributions.
- 3.195 Bridgend County Borough Council recently undertook a Local Housing Market Assessment (2019/20); a statutory assessment that reviews the County Borough's housing needs through a holistic review of the whole housing market. This evidence will provide a robust basis to inform key housing related policies within the Deposit Plan and present a firm rationale to secure planning obligations for affordable housing. When assessing the local housing market as a whole, the Assessment specifically calculated the deficit of affordable housing within the County Borough; 411 affordable housing units per annum, comprising 280 social rented units and 131 intermediate units. The Assessment also revealed notable differences in housing market characteristics across the County Borough, with affordability being most acute in in southern Housing Market Areas. However, there is a need to instil greater choice in all housing markets, with a drive for sustainable, smaller units for future generations, balanced with larger property types to facilitate household progression. The identified shortfall of 411 affordable units per annum indicates the scale of housing need within Bridgend County Borough, which the Council will seek to address through a range of market interventions as far as practically possible, whilst considering the viability of different areas and sites. The LDP is one means of helping to

address the shortfall (through area specific affordable housing thresholds and percentages), but is not the only mechanism to deliver affordable housing. The resultant affordable housing delivery target in the Deposit LDP will therefore be informed by the full plethora of delivery streams available balanced against the housing need identified in the LHMA and a viability study to determine the level of contributions that can be supported by residential developments across the County Borough. The spatial strategy has also be informed by the LHMA in terms of seeking to address areas of high housing need.

Gypsy and Traveller Provision

- 3.196 Several representors, particularly residing with the grouped settlement of Pyle / Kenfig Hill / North Cornelly stressed that Gypsy and Traveller needs should be considered in the Replacement Plan.
- 3.197 The requirement as to whether the Council will need to identify Gypsy and Traveller Sites is now determined by the new requirements of the Housing (Wales) Act 2014. The Housing (Wales) Act 2014 requires each local authority in Wales to undertake a Gypsy and Traveller Accommodation Assessment (GTAA) to ensure that needs are properly assessed and planned for. The existing GTAA covers the period 2016-2031 and estimates the additional pitch provision needed for Gypsies and Travellers in Bridgend. For the first 5 years of the GTAA plan period, the Assessment identified no requirement for additional pitches, and for the remainder of the GTAA plan period, the Assessment identified need for one further additional pitch. This gives a total need for the whole GTAA plan period of one additional pitch. A refreshed assessment will be carried out to inform the Replacement LDP, which will re-consider the needs of Gypsy and Travellers in the County Borough and identify whether any permanent or transit pitches are required over the Replacement LDP period. The requirement for the provision of Gypsies and Traveller sites in the County Borough will also be kept under review over the lifetime of the Replacement LDP and a criteria based policy will also be included to accommodate any needs that may emerge up until 2033.
- 3.198 In this respect, Welsh Government has reminded the Council,
- “A GTAA must be prepared and agreed by Welsh Ministers in advance of the Deposit stage for the whole plan period (2018-2033) with provision made for appropriate and deliverable site allocations to meet an identified need within the required timescales, if appropriate. Failure to prepare a GTAA and meet the required need is likely to result in the plan being unable to be found ‘sound’”.
- 3.199 Since publication of the Preferred Strategy, the Council has begun preparation of a revised GTAA, with a draft expected for completion well in advance of the

Deposit Plan's scheduled publication. The Council has also contacted Welsh Government's Equalities Division to advise on timescales and ensure the evidence is in place by Deposit.

- 3.200 Welsh Government has also stated that the reasoned justification for Strategic Policy 7, "Should refer to the most up-to-date Welsh Government Circular 005/2018". This comment is welcomed by the Council and the Policy wording will be updated in the Deposit Plan to reflect these changes, ensure the policy is not too restrictive and ultimately ensure alignment with national policy.

Parking Provision

- 3.201 A number of respondents felt there was a lack of parking provision on new build developments and asked how the Replacement LDP would address this issue going forward. Settlement specific concerns were also raised regarding the loss of the temporary car park in Porthcawl (to make way for the Waterfront Regeneration Site) and the impact this would have during the busier summer months.
- 3.202 The provision of car parking spaces in all locations will be determined in line with land-use development and according to approved parking standards. Crucially, the Replacement LDP will seek to reduce car use and promote walking and cycling, whilst minimising reliance on the private car and therefore the demand and need for parking spaces. Legal agreements and planning contributions will however be utilised to ensure adequate parking provision is provided whilst safeguarding the quality of the built environment.
- 3.203 One of the key issues raised by local people in Porthcawl was that development of Porthcawl Waterfront will lead to a net loss of off-street car parking; parking provision that is critical to local people and the tourist economy. Whilst the proposed regeneration development is on a car park, this has been utilised as an overspill car park for additional seasonal provision. Re-development of this site would therefore have an impact on parking provision at peak seasonal times. However, a refreshed masterplanning exercise will consider a comprehensive strategy for the area and proposals may require a more detailed traffic/transport assessment.

Question 6

This section of the Preferred Strategy focusses on how the LDP will facilitate economic growth by allocating key strategic employment sites, retaining and safeguarding established employment sites that are viable, and allowing smaller scale developments within local service settlements and rural enterprises. This plethora of employment provision will provide

numerous opportunities for investment and enable employers to diversify and grow their own businesses.

Do you have any comments to make on the related policies?

Status of Employment Allocations

- 3.204 Barratt David Wilson stress the inherent relationship between employment land and housing requirements. Barratt David Wilson also advise considering the allocation status of, “Unviable employment sites which have not been delivered in the LDP”, with a view to exploring, “Whether viable alternatives (or non traditional employment generating uses) would be more deliverable on such sites”.
- 3.205 Similarly, Barton Willmore (on behalf of South Wales Land Developments Ltd), state that, “The continued employment allocation at Ty Draw Farm would serve to hinder the ability of the LDP to meet the key issues and drivers and therefore would fail to meet the tests of soundness”. Barton Willmore are of the opinion that the Preferred Strategy over-allocates employment land, that Ty Draw Farm has, “Been allocated and actively marketed for decades with no success” and that the site should therefore be considered for alternative uses over employment. PPW’s site search sequence is referenced and Barton Willmore instead feel that the site’s, “Allocation for housing would moreover relieve pressure on any further urban extension into the open countryside for housing and would therefore contribute towards the soundness of the plan”.
- 3.206 Asbri Planning (on behalf of the Jehu Group) also state that,
- “Given that this site [Ty Draw Farm] has been allocated for employment use at least five times, over a period of over 40 years, it is considered that it is clearly no longer needed for office, industrial or retail purposes, that it is underperforming and that its de-allocation through the development plan process must be considered”.
- 3.207 Asbri Planning also reference the fact that the site has been marketed nearly 6 years by Lambert Smith Hampton and that “this marketing has shown no concrete interest in developing the site for employment uses, or indeed retail uses”. On this basis, Asbri Planning feel that the site is, “Clearly suitable for residential development”, given the residential development on the southern portion of the site. It is also specifically stated that the, “Jehu Group, alongside two Registered Social Landlord partners, wish to develop the site for a 100% affordable housing scheme”. A revised residential allocation is therefore deemed suitable for alignment with the Preferred Strategy’s Key Issues and Drivers.
- 3.208 As concluded in the 2019 Economic Evidence Base Study, “We recommend slightly more land for re-allocation than the need. This provides some scope for the Council, on balance, to decide that an alternative non-employment use is

policy preferable on around 10 ha of the land we suggest is retained” (para 6.60). In light of these comments and submitted evidence, this allocation will be re-evaluated as part of the Deposit Plan.

3.209 Savills (on behalf of Bridgend College) support, “The continued proposed allocation of Pencoed Technology Park for employment”, reflecting, “The designation of Pencoed as a SGA as it proposes both housing and economic (employment) growth for the town and its edges”. Lichfields (on behalf of Persimmon Homes) stress the need for adjoining authorities to support growth across the Cardiff Capital Region and reference the retention of Pencoed Technology Park within the Replacement LDP. Lichfields consider that, “This site could be suitable for further expansion to accommodate more than 5ha of employment land. This opportunity should be explored as part of the preparation of the Replacement LDP”.

3.210 The 2019 Economic Evidence Base Study has reviewed the property market for general employment space in the County Borough, utilising a qualitative assessment that complements and tests the quantitative assessment of need. This study concluded the, “The Borough already has sufficient land allocated to meet identified need (60ha)” and therefore the Council does not consider additional sites necessary over and above those already identified. Paragraph 5.79 of the Study states,

“The planned sustainable urban extension in neighbouring Rhondda Cynon Taff, which could deliver 10,000 new homes, is likely to bring demand for new employment space, especially those sites located further east in this Borough i.e. around Pencoed, Bridgend Town and Valleys Gateway – all of which have available serviced sites. But this is pending the progress of this through their local plan and that some of this labour may be attracted into Bridgend. At the moment, because this is only a proposal with no status we have not, when calculating 60ha of land in the next plan, made any provision for additional cross boundary workers to commute into Bridgend”.

3.211 However, the Study also references the fact that, if the Llanillid proposal is committed,

“There is merit in considering Bridgend as the employment hub for many of the potential new workers which may make a better ‘joined up’ planning strategy than treating this proposal as ‘self contained’. Not considering such a large proposal in its functional labour market context could result in unnecessary allocation of new sites and fruitless local competition for investment” (para 6.5).

- 3.212 Bridgend County Borough Council is committed to working in partnership regionally to this end, although the Replacement LDP timetable is far in advance of any additional growth proposals at Llanillid, which have no status at present.

Junction 36 and the Valleys

- 3.213 Savills (on behalf of Lavignac Securities Limited) have commented that, “In general terms the employment land strategy (Policy 11) is supported” and the evidence base is praised in this respect. However,

“It is considered that an additional sub paragraph should be added to ensure that the opportunity to bring forward improvements to the junction 36 is recognised and the potential opportunities that these would bring not only to the Valleys Gateway settlement but also to the Valleys themselves”.

- 3.214 These comments are noted and will be considered in the preparation of the deposit LDP.

- 3.215 Savills (on behalf of Lavignac Securities Limited) also reference the mismatch between the location of employment sites and areas of deprivation in the Valleys. It is considered that, “The overall strategy of focusing substantive economic growth away from the northern part of the County Borough does not comply with the intentions and requirements of the national and local evidence base”. These issues are discussed within the 2019 Economic Evidence Base Study and Background Paper 7: Employment. This has helped shaped the Preferred Strategy, and Paragraph 2.4.5 of the main document clearly references this issue,

“It is undoubtedly important that future growth is directed towards the most efficient and sustainable locations with accompanying transport infrastructure to promote accessible employment sites that capitalise on active travel opportunities. However, the Replacement LDP will also support the socio-economic renewal of deprived communities across the whole administrative area”.

Rural Enterprise

- 3.216 A representation has been received that strongly supports “the retention of Policy ENV1: Development in the Countryside, specifically where support for development for rural enterprise is encouraged”.

- 3.217 A response has also been received that, “Supports strongly Strategic Policy 11: Employment Land Strategy and in particular Criterion No. 4, which seeks to

support appropriate rural enterprise within the countryside to help enhance and diversify the rural economy". A local landowner has also referred to the importance of considering rural businesses and enterprises "when allocating new sites for large scale development". It is considered that, "These developments can place considerable strains and constraints on the operating space of nearby rural enterprises through their often considerable impact on road traffic, noise, pollution etc as well as the fundamental changes they can make to the rural character of an area". The Council notes these comments and can confirm that all strategic and housing allocations will need to be supported by a Strategic Transport Assessment to evaluate concerns of this nature.

Level of Employment Provision

- 3.218 A number of representors questioned whether the Replacement LDP will deliver additional jobs to accompany the new homes proposed and cited concerns over car based commuting along the M4.
- 3.219 A significant proportion of the County Borough's population is expected to move into the 60+ age category over the life of the Replacement LDP; 26% of the population structure was aged 60+ in 2018 and this is projected to increase to 32% by 2033. With such absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Preferred Strategy is therefore be underpinned by a level of growth, largely driven by the 35-44 age group, which is estimated to support an increase in people in workplace based employment over the Plan period. The projected increase in the working age population and the linked dwelling requirement underpinning the Preferred Strategy (505 dwellings per annum) will provide significant scope for residents to live and work in the area, supporting growth of up to 333 jobs per annum.
- 3.220 The planned level of housing growth is neither constrained in a manner that could frustrate economic development or promoted in such a way as to encourage inward commuting. Rather, the underlying projection promotes sustainable forms of growth that will help minimise the need for out-commuting and promote more self-contained, inter-connected communities in accordance with the LDP Vision. This level of growth is considered most conducive to achieving an equilibrium between the number of homes provided and the job opportunities expected; a balance that is required by Planning Policy Wales. Opportunities for economic growth will be facilitated by directing employment generating development to the most appropriate and sustainable locations, supporting expansion of existing businesses and ensuring strong spatial alignment between housing and employment growth. This holistic employment land strategy will enable 60 hectares of new employment land to be brought forward and accommodate up

to 4,995 additional jobs over the Plan period. The Preferred Growth Level can be succinctly explained by the acronym 'CARM', which summarises the Strategy's intentions to Counter-balance the ageing population by Attracting skilled, economically active households, Retaining skilled, economically active households and rendering the County Borough a Magnet for employers to expand within or move into.

Question 7

This section of the Preferred Strategy establishes a retail hierarchy plus boundaries for retail and commercial centres, to ensure they continue to be the principal locations for new retail, office, leisure and community facilities. The aim is to increase social and economic activity having regard to the nature, scale and location of the proposed development in relation to the respective settlement.

Do you have any comments to make on the related policies?

Town Centres

- 3.221 Merthyr Mawr Community Council have stressed that, "Retail development with accompanying facilities needs to be focused on the town centres", which is a key theme of the Preferred Strategy
- 3.222 Turley (on behalf of Ashfield Land), "Support the recognition that Bridgend Town Centre is positioned at the top of the retail and commercial hierarchy in the County Borough" and, "Welcomes the recognition that the centre [Bridgend Shopping Centre] forms an important part of the wider town centre". However, Turley advocate amending the definition of acceptable uses within Primary Shopping Areas, "To allow greater flexibility and diversity of uses", adding, "appropriate non-A1 uses should not be ruled out entirely at ground floor level". Turley also, "Support the requirement for any further expansion of the Bridgend Designer Outlet Village to be subject to compliance with the uses specified by the section 106 agreement". These comments are noted by the Council and will be considered in development of the Deposit Plan.
- 3.223 One local resident cited confusion as to where additional convenience facilities would be situated at Porthcawl Waterfront due to the retail boundary restrictions outlined in Section 5.5.55, 5.4.61 and 5.4.62. However, a refreshed masterplan of the proposed Porthcawl Waterfront Regeneration site is yet to be carried out and will inform the Deposit Plan.

Evidence Base and Retail Study Methodology

- 3.224 Mango Planning have made numerous statements on the proposed retail strategy, including detailed comments on the methodology, evidence base (including the robustness of the 2019 Retail Study) and specific development control policies. The 2019 Retail Study's population and expenditure methodology is criticised on the basis that it "singularly fails to recognise the differing per capita spending on each category of comparison goods" and is perceived to double count existing commitments. Concerns are also cited regarding the market share approach, with reference to the assumptions on improvements in retail efficiency for comparison goods retailers, the reservation of expenditure growth and Bridgend's market share being maintained as constant.
- 3.225 Mango Planning also refer to the Council's 'town centres first approach' and are of the opinion that, "The development plan does not have to be merely a mouthpiece for national guidance" and, "The Council simply has to secure proper commercial input on the location of new retail rather than churn out the tired directive approach of the 1980s". Mango Planning suggest a, "More tightly drawn core retail area, greater flexibility for businesses to change use class within secondary areas and support for conversion of peripheral shops to housing are just some of the concepts that the development plan should grapple with". Mango Planning also feel that, "It is disappointing that the town centre and retail vision has yet to be crystallised by the Council".
- 3.226 Mango Planning comment that, "The proposed continuation of Policies REG 5, 6, 9, & 11 in the emerging plan is surprising and disappointing". Given the sites' past histories, it is argued, "Before any of these sites are re-allocated, a proper market led review is required to determine whether they could ever come forward". In addition, REG 6 is considered "A dated policy that precludes use of Class A1 shops by other uses for a substantial period of time". Potential loss of retail units is deemed to be better considered, "Within the context of the evolving role of the High Street where the driver is footfall, not retail".
- 3.227 The Council notes all of these comments, accepting that Mango Planning begin their representation by promoting their capacity as a, "Specialist retail and commercial planning consultancy" that is, "Well placed to review this Retail Study and the strategy that is built upon it". Mango Planning also conclude by offering assistance, "In taking the development plan in the positive direction that we consider that it requires at its next stage". It is therefore acknowledged that this representation primarily seeks to promote Mango's services as a consultant.
- 3.228 However, and fundamentally, the representation fails to acknowledge that the 2019 Retail Study meets the requirements of national policy in terms of retail

planning at Preferred Strategy stage. Firstly, the evidence base has used local commitment information, and, as per the Retail Study, there are no major retail commitments or new schemes forecasted in the study area over the plan period. Secondly, the conclusions on limited capacity (convenience and comparison) reflect the state of the retail market today, where spending growth is now more limited and there is little demand for additional space. Where there is demand, it is focused on only the most buoyant centres, which is discussed in the trends under polarisation (refer to section 4.3 of the 2019 Retail Study). Instead, demand for additional convenience space is primarily driven by population growth, which affects the outputs, reduced by existing commitments. While there is more growth in relation to comparison retailing, there is not expected to be a shift in comparison retail patterns, which could mean that the County Borough will claw back significant expenditure currently going elsewhere. Some growth is expected, although growth that has limited floorspace implications. In summary, therefore, this representation is not deemed to undermine the retail strategy underpinning the Preferred Strategy and the derived policies therein.

Question 8

This section of the Preferred Strategy promotes sustainable development which will contribute to meeting national renewable and low carbon energy and energy efficiency targets, including sustainable development of mineral resources and waste management.

Do you have any comments to make on the related policies?

Mineral Safeguarding

- 3.229 Broadly speaking, the Mineral Products Association have commented, "We feel that the direction of the Preferred Strategy in identifying Growth Areas prior to identifying Mineral Safeguarding Areas is very much putting the cart before the horse". It is also stated, "The process of allocating sites before considering site mineral safeguarding is not sustainable". It should be stressed that the spatial strategy has been informed by the 2019 Settlement Assessment and Background Paper 3: Spatial Strategy Options. Moreover, each candidate site has been assessed, based on the locational need for minerals extraction, within the Sustainability Appraisal of the Preferred Strategy. Whilst the Preferred Strategy does identify potential Strategic Site Options, as stated in paragraphs 4.4.44 – 4.4.47, these are theoretical options considered to have the potential to underpin the Spatial Strategy by accommodating sustainable housing growth and focusing development within the Regeneration Growth Areas and Sustainable Growth Areas. However, the final selection of sites will be dependent on detailed assessment work, including further consideration of mineral safeguarding. Supporting paragraph 5.4.105 to Strategic Policy 14 states,

“Given the distribution of mineral within the County Borough and the location of existing settlements it is considered inevitable that there will be some loss of mineral, however this will be minimised through careful site selection. A detailed safeguarding policy will be included to ensure that the need to protect the mineral resource is considered prior to any non-mineral development outside allocated sites or identified development boundaries. Within development boundaries the need to undertake prior extraction to address issues of instability will also be addressed”.

- 3.230 The Mineral Products Association have also made several detailed points and suggested amendments to some policies and text within the Preferred Strategy, all of which are noted by the Council and will be considered in development of the Deposit Plan and policies.
- 3.231 Merthyr Mawr Community Council has stressed that, “The Borough has high levels of minerals, protected species and water reserves which need to be considered in development plans”. These allocations will be duly considered before sites are allocated in the Deposit Plan. Strategic Policy 14 within the Preferred Strategy also seeks to encourage the efficient and appropriate use of minerals within the County Borough, including the re-use and recycling of sustainable minerals as an alternative to primary won aggregates.
- 3.232 The Coal Authority has stated, “[We are] pleased to see that the policies relating to unstable land and coal extraction will be carried forward into the new plan and we agree that amendments may be required to reflect contextual and legislative changes”. These comments are noted by the Council.

Decarbonisation and Renewable Energy

- 3.233 One representor, “Supports strongly Strategic Policy 3: Mitigating the Impact of Climate Change”. The potential vertical agriculture/horticulture and energy production uses are referenced and it is considered that, “Such uses, should be supported by policy insofar as it provides a positive contribution towards mitigating against Climate Change”. The same representor cites similar support for Strategic Policy 13: Decarbonisation and Renewable Energy. Criterion 1 is highlighted specifically, because it, “Seeks to encourage new energy system ideas and concepts, which should be encouraged throughout the County Borough where appropriate”.
- 3.234 Lichfields (on behalf of Taylor Wimpey) have raised concerns, “That the proposed requirement for developments to meet 25% of their energy needs through renewable/low carbon technologies will not be commercially viable in

many cases”. Rather than specifying a minimum requirement, therefore, it is suggested that, “This draft text should be amended so that it promotes the use of renewable/low carbon technologies, to include energy efficient building technologies”. Barton Willmore have also stated that, “It is not considered appropriate for LDP policies to include further setting of building standards above and beyond Building Regulations.” Furthermore, whilst supporting the principle of decarbonisation and use of renewable energy, DPP feel the current policy wording, “Is over prescriptive and does not necessarily reflect the work/progress being undertaken at Welsh Government level on this matter”. DPP therefore advocate flexibility within the wording, “So that the constantly evolving landscape of climate change policies at national level can be incorporated within developments and ensure that the aspirations of both local and national administrations can be delivered in a consistent way”. Turley (on behalf of Ashfield Land) also recommend that Strategic Policy 13 should allow for greater flexibility, including “site specific considerations to be taken into account, alongside other issues such as viability”. The HBF also reference the fact that this is an evolving area of policy, suggesting, “That the plan needs to ensure that this is not overly prescriptive and is worded in a flexible way to allow it to align with national policy as it continues to develop”.

3.235 These comments are all noted by the Council and will be considered as the related policies develop within the Deposit Plan.

3.236 Welsh Government has commented that,

“A proportion of the authority is within Priority Area 14 for solar and wind energy in the draft NDF. On this basis, the authority should ensure that it is in general conformity with the NDF once it is adopted. Whilst it is disappointing that the Preferred Strategy is not supported by a Renewable Energy Assessment (REA), the plan is clear that the assessment is currently being prepared and supported by the Council’s Smart Energy Plan (2019) will identify specific areas of search or the potential for particular types of renewable and low carbon energy including district heat networks.

3.237 This is fully accepted by the Council and the Deposit Plan will reflect these comments accordingly. The REA will inform the Deposit Plan as detailed within Welsh Government’s response, in line with Planning Policy Wales and the Welsh Government’s Toolkit for Planners (2015).

Question 9

This section of the Preferred Strategy seeks to conserve and enhance the natural and historic environment of the County Borough, recognising that the unique characteristics help attract investment, promote tourism, provide cultural experiences and encourage healthy lifestyles for communities. These goals need to be balanced alongside the need to facilitate sustainable economic growth.

Do you have any comments to make on the related policies?

Healthy Lifestyle and Health Impacts

- 3.238 Cwm Taf Morgannwg Public Health Team have stressed the need for infrastructure that underpins healthy behaviours. It is considered that, “Ensuring development maximises walking and cycling access is an important enabler for active travel”. Reference is also made to the link between health and housing, and it is suggested that, “Future plans should include the development of housing options for this age group [older people] that maximise well-being and independence, are energy efficient and free from hazards”.
- 3.240 Cwm Taf Morgannwg Public Health Team also advocate, “A health impact assessment approach to be undertaken to ensure that consideration is given to the potential health impact of major development proposals”. This is considered important, “So that healthy lifestyles and choices are supported and the risk of widening health inequalities reduced”. The Council note these comments and refer to the Health Impact Assessment Screening of the Preferred Strategy, which was pro-actively completed in advance of the consultation to help shape the Preferred Strategy. This has assessed the proposed LDP’s potential consequences for health and well-being on the population of Bridgend County Borough.

Recreation Space

- 3.241 Cwm Taf Morgannwg Public Health Team also stress the importance of ensuring “that community services and social facilities continue to meet the needs of communities”. This point is noted by the Council and is a key element of the Preferred Strategy. Reference is also drawn to the retention and enhancement policies for green infrastructure and outdoor recreation. Whilst this is considered, “A laudable aim”, it is suggested that, “this statement may need to be amended in light of the increase in pitch fees from 1 April 2020, which will make the costs for small clubs/organisations unaffordable”. A holistic Green Infrastructure Assessment will be completed to inform the Deposit Plan. Technical Advice Note 16 includes a site typology within Annex B, which states that outdoor sports facilities and amenity greenspace (whether publicly or privately owned) should be considered in formulating open space assessments

and development plan policies. TAN 16 references the fact that, “The provision of facilities with secure access and admission charges and centralised, instead of localised provision, can have a significant effect on their role in meeting recreational and amenity needs”. However, whether the proposed pitch fees would have a ‘significant effect’ on the role pitches having in meeting recreational and amenity needs is questionable. It is difficult for the Green Infrastructure Assessment to assess this factor to inform the Replacement LDP, although Fields in Trust Standards will be utilised in preparation of the updated evidence base.

- 3.242 LRM Planning (on behalf of Taylor Wimpey) have stated that the Former St John’s School site in Newton, Porthcawl, “Is not currently in use as a playing field or play area”. A revision to the Outdoor Sports & Children’s Playing Space Audit 2017 has therefore been requested with a view to considering this site for residential development. A comprehensive review of the Audit is already scheduled to inform the Deposit Plan and this issue will be duly considered during the review.
- 3.243 Merthyr Mawr Community Council consider there to be a lack of ‘usable public green space’ within Bridgend Town and state, “The lack of public green space, playing fields and allotments is acknowledged in the strategy report and yet no concrete strategy appears to be given in respect of such provision”. As aforementioned, a refreshed audit of outdoor sports and children’s playing space provision will be conducted to inform the Deposit Plan, which will also feed into a more holistic Green Space Infrastructure Assessment. This refreshed evidence base will help shape related policies in the Deposit Plan.

Natural and Historic Environment

- 3.244 Merthyr Mawr Community Council has stressed the, “Need to protect and maintain the intrinsic beauty of our coasts, valleys and small towns and villages”, drawing parallels with the propensity for tourism and visitors. It is suggested that the LDP should fully acknowledge the need to protect, “The nationally recognised heritage area of Merthyr Mawr, the sand dunes and the coast” for the benefit of all residents. A local landowner has welcomed the fact that the Preferred Strategy recognises the natural and historic environment within the County Borough is a valuable resource, which needs protection. It is stressed that,

“Especially sensitive and high quality assets within the County Borough, should be properly acknowledged and identified, and afforded a level of protection commensurate with their status, unique character, and the value they bring to the wider community”.

- 3.245 These points are acknowledged by the Council and already form a key part of the Preferred Strategy. Key Issue and Driver LS1 states, “The County Borough contains nationally, regionally and locally important landscapes and coastal scenery and a wide range of biodiversity and nature conservation interests which require identification and protection in the LDP”. In addition, Key Issue and Driver LS2 states, “The rich built heritage and historic environment of the County Borough requires protection in the LDP”. Strategic Policies 17 and 18 contain detailed criteria in relation to conserving and enhancing the natural environment and conserving the historic environment, respectively.
- 3.246 One resident has requested further references to the ecological resilience, connectivity and climate change policies, in particular, evidence to support Strategic Policy 17: Conservation and Enhancement of the Natural Environment. These suggestions are noted by the Council.
- 3.247 Natural Resources Wales have stated, “We believe greater emphasis needs to be given to flood risk, enhancing biodiversity, the Water Framework Directive (WFD) and to recognition of the multi-functional nature of green infrastructure throughout the plan”. A number of detailed proposed amendments and advice on matters that are deemed to require further consideration have been provided within the representation, which is welcomed and noted by the Council. These proposals will be considered further as the Deposit Plan is prepared.

Agricultural Land

- 3.248 Welsh Government have referenced the importance of conserving Best and Most Versatile (BMV) Agricultural Land. Welsh Government specifically state,
- “It is unclear how the authority has taken account of BMV land in developing the spatial strategy, site selection process and new allocations as significant amounts of BMV land (totalling 186ha) cover key sites in the Sustainable Growth Areas at Island Farm, Bridgend, Pencoed Campus and Land east of Pyle. We would urge the authority to work with the Welsh Government’s Natural Environment and Agriculture Team moving forward to Deposit using the most up-to-date Predictive ALC Map for Wales”.
- 3.249 These comments are welcomed by the Council. Since publication of the Preferred Strategy, a meeting has been held with Welsh Government’s Natural Environment and Agriculture Team and the Deposit Plan will respond accordingly.

Question 10

Do you have any other comments to make on the Preferred Strategy?

Regional Planning

- 3.250 Neath Port Talbot County Borough Council has commented,
- “After reviewing the document and supporting information NPT Council is generally supportive of the Strategy and the approach that has been taken. We look forward to continuing to work collaboratively with you on cross boundary issues as your Plan proceeds and work begins on our Replacement Plan”.
- 3.251 This comment is noted and very much welcomed by the Council, especially given Bridgend’s unique, pivotal position between the Swansea Bay Region and the Cardiff Capital Region. The interdependencies and relationships between the Swansea Bay Region and the Cardiff Capital Region is of particular importance to Bridgend County Borough. Close working relationships will be maintained with Neath Port Talbot County Borough Council (and other neighbouring authorities) as the Replacement LDP progresses. Indeed, Welsh Government highlight that, “The plan must clearly demonstrate how these relationships have influenced the strategy and at later stages the plan policies, proposals and site allocations”.

Candidate Sites and Candidate Site Assessment Report

- 3.252 A number of concerns have been raised by local residents regarding sites within the Candidate Sites Register. However, the purpose of the Register is to showcase all the nominated sites that were submitted by land-owners, developers and the public for consideration for inclusion within the Replacement LDP. More detailed candidate site assessments will commence ahead of the Deposit Plan, identifying all potential constraints relating to the sites.
- 3.253 Several representors also made comments on the Candidate Site Assessment Report (June 2019). This report was released for information purposes and is not part of the Preferred Strategy Consultation. These comments are included in Appendix 4 for reference only, although no further responses are made on these representations within this report.
- 3.254 Certain representors have also referred to the Candidate Site Assessment Report and Sustainability Appraisal (SA) Report interchangeably, although these are separate documents with different purposes. The former sets out a four-stage methodology that will be used to assess Candidate Sites for inclusion in the Replacement LDP. The latter details the findings of a SA, incorporating Strategic Environment Assessment (SEA), of the substantive proposals set out within the Pre-Deposit Documents. This includes an assessment of likely significant environmental and wider sustainability effects together with recommended mitigation and enhancement measures for incorporation into the Replacement

LDP as it develops. Specific comments on the SA Report will now be addressed in turn.

Sustainability Appraisal

- 3.255 One resident expressed their support for the preferred level of growth as outlined, providing it is guided by the SA/SEA appraisal. Indeed, the initial SA Report provides a proportionate assessment of all candidate sites to provide evidence regarding their level of conformity with the LDP Preferred Strategy and will be further enhanced to support the identification of site allocations at LDP Deposit Stage.
- 3.256 Concerns have been raised by Barratt David Wilson that the SA Candidate Site Assessment has automatically dismissed all sites scoring '--' against the five key criteria, with all other candidate sites having been subject to a full assessment. However, the SA of Candidate Sites Report confirms that no decisions have yet been made regarding the allocation or rejection of individual sites (paragraph 1.2.2 refers). No sites have therefore currently been dismissed because of SA work undertaken to date. As advised in the SA of Candidate Sites Report, all SA site assessments will be reviewed and updated (where necessary) to take account of new information provided by site promoters prior to candidate sites being confirmed as either reasonable alternatives (from which site allocations will be selected for inclusion in the Deposit Plan) or rejected sites. The identification of reasonable alternative sites will consider both sustainability criteria and the conformity of sites within the Preferred Strategy. A staged approach to assessment has been adopted in line with guidance set out in the Development Plans Manual. Five key criteria were used to identify major sustainability or deliverability constraints to ensure the assessment remains proportionate and to allow focused engagement with key consultees. In the absence of further information from site promoters, this approach could result in sites being rejected on the grounds of not constituting a reasonable alternative. However, the SA of Candidate Sites Report was presented on a voluntary basis at LDP Preferred Strategy stage to identify these key constraints and allow site promoters to submit further information to address these, following which the SA of Candidate Sites Report will be updated.
- 3.257 A number of representors have also made site-specific comments in relation to the SA. In particular, Barratt David Wilson refer to the Land East of Danygraig (312.C1), commenting that the site was, "Scored a -- because it is considered to be within a Site of Special Scientific interest (SSSI)" and, "is considered to include Ancient Woodland", whereas the site actually abuts these environmental designations. In addition, Barratt David Wilson feel the site was incorrectly scored as being within a Special Landscape Area and for containing Tree Preservation Orders or Important Trees and Hedgerows. A revised assessment pro-forma was submitted to address these errors and re-score the site in terms of how the site

promoter views its sustainability. The errors identified in respect of candidate site 312.C1 are due to unavoidable overlaps between the GIS layers of the site boundary and environmental constraint layers directly abutting the site. The scoring in the current SA of Candidate Sites Report will therefore be subject to a thorough review and, where necessary, manually updated to correct instances where overlapping GIS layers have resulted in incorrect scoring outputs. In consequence, site 312.C1 will not be excluded solely on the basis of key criteria (i.e. being within a SSSI) and a detailed assessment will be populated for the site, taking account the information provided by the site promoter. This will be undertaken prior to updated SA site assessments being finalised, following which reasonable alternatives or rejected sites will be identified. It should however be noted that whilst immediate proximity to a SSSI will not result in the automatic exclusion of the site, any likely impacts on the special features of this statutory designation will be considered when determining whether the site constitutes a reasonable alternative or should be rejected.

- 3.258 Several site-specific comments have also be made by Persimmon Homes West Wales in relation to Land South of Coychurch (221.C3). Persimmon Homes West Wales have stated that the site was incorrectly scored (and excluded) as being on Common Land under the Commons Act 2006 and the site was also scored (and excluded) as being within Flood Risk Zone C2, whereas the majority of the site is within Flood Risk Zone A and only a small area is within Flood Risk Zone C2. The representation also commits to avoiding development within the Flood Risk Zone C2 area and on this basis argues that the site should not be excluded from consideration. Candidate site 221.C3 was indeed incorrectly scored as being on Common Land as the site abuts (and the site's GIS layer overlaps with) an area of Common Land to the south east (Moor Farm). Having identified this issue, the scoring in the current SA of Candidate Sites Report will be subject to a thorough review and, where necessary, manually updated to correct the limited number of instances where overlapping GIS layers have resulted in incorrect scoring outputs. In consequence, site 221.C3 will not be excluded due to being located on Common Land. Additionally, in accordance with paragraph 1.2.2 of the SA of Candidate Sites Report (Appendix F of the LDP Preferred Strategy SA Report), the further information submitted by the site promoter with respect to flood risk will be taken account of in updating the SA site assessment. Subject to the commitment not to develop land within the Flood Risk Zone C2 area being secured through the provision of an updated site boundary, this will allow the site assessment to be updated to identify the site as being largely within Flood Risk Zone A. On this basis, the site will not be excluded, and a detailed assessment will be populated for the site, taking account the information provided by the site promoter. This will be undertaken prior to updated SA site assessments being finalised, following which reasonable alternatives or rejected sites will be identified.

- 3.259 Savills (on behalf of Lavignac Securities Limited) have argued that Common Land is not an absolute development constraint and sites should therefore not be excluded from consideration on this basis (with specific reference to Candidate Site 348.C1: Land North of Junction 36 M4). Instead Savills state, "The withdrawal of this perceived absolute constraint places puts it on a footing that is more appropriate for development during the latter part of the LDP period and that this opportunity can then be reflected in the SDP process". The SA of Candidate Sites Report confirmed at paragraph 1.2.2 that no decisions have yet been made regarding the allocation or rejection of individual sites. No sites have therefore currently been dismissed because of SA work undertaken to date. In line with the Development Plans Manual, an integrated site assessment and selection process is being undertaken to identify site allocations for inclusion in the Replacement LDP. Both the existing and draft LDP manuals require this process to consider the preferred spatial strategy, sustainability and deliverability issues from the outset. The assessment of candidate sites relative to Common Land was therefore included as key criteria to facilitate a proportionate assessment of site deliverability at LDP Preferred Strategy stage. This is considered appropriate as the Commons Act 2006 restricts the use of such land and requires applications for the release of Common Land exceeding 200m² to be accompanied by proposals for replacement land. In line with the existing and draft LDP manuals, further deliverability criteria will be adopted for assessing sites at Deposit Plan stage. The representation from Savills on behalf of Lavignac Securities acknowledges that no formal proposals for replacement land have been identified and the acceptability of development on this Common Land has not been established. On this basis there remains a clear legal impediment to the delivery of this site for private development and it remains scored as '--' in relation to Common Land. In the event that the site promoter is able to provide further information to evidence the deliverability of site 348.C1 (beyond an intention to undertake future discussions with the commissioners), the site assessment would be updated to reflect this in accordance with paragraph 1.2.3 of the SA of Candidate Sites Report.
- 3.260 More generally, Welsh Government's Agricultural Division has advised that the SA of candidate sites criteria and scoring should be updated to align with Version 2 of the Predictive Agricultural Land Classification Map for Wales. As advised in the SA of Candidate Sites Report, all SA site assessments will be reviewed and where necessary updated prior to candidate sites either being confirmed as reasonable alternatives (from which site allocations will be selected for inclusion in the Deposit Plan) or rejected sites. Version 2 of the Predictive Agricultural Land Classifications Map for Wales will be applied in the SA site assessment methodology and SA site assessments updated as required at this point. The identification of reasonable alternative sites will then consider both sustainability criteria and the conformity of sites with the Preferred Strategy.

- 3.261 Several comments have been made by Natural Resources Wales in relation to the HRA Screening Report. Firstly, the representor sought confirmation that, in line with caselaw, neither mitigation nor compensation were taken account of in undertaking an HRA screening of the LDP Preferred Strategy. Section 2.3 of the LDP Preferred Strategy HRA Screening Report provided a detailed analysis of relevant caselaw and made clear that neither mitigation nor compensation can be considered at HRA Screening stage. This approach was then adopted in the screening assessment provided in Section 4.
- 3.262 Natural Resources Wales also confirmed that all relevant European Sites had been recognised and agreed with the identified threats and pressures for European Sites, whilst requesting the addition of climate change as a key issue for river designations. Natural Resources Wales also advised that surface water pollution should be identified in relation to impact pathways on Cefn Cribwr Grasslands Special Area of Conservation. More widely, it is also recommended that species disruption effects and cumulative impacts should be considered in the assessment. The advice provided by Natural Resources Wales regarding additional key issues and impact pathways to consider in the HRA process is noted and welcomed. All of these issues will be addressed in the preparation of the Deposit Plan HRA (Appropriate Assessment) Report.
- 3.263 Further comments have also been made by Natural Resources Wales in relation to the SA Report. For one, the consideration of placemaking impacts in the SA of the LDP Strategic Framework was welcomed. Additional considerations have also been identified regarding green infrastructure (provision and multi-functional benefits), biodiversity and placemaking. It is suggested that these additional considerations should be taken account of in both the identification of key issues and in the SA Framework used to assess all substantive components of the emerging Plan. These comments are noted and welcomed. Whilst substantial changes to the SA Framework are not deemed necessary, the key sustainability issues table and SA Framework will be reviewed and refined prior to undertaking the SA of the Deposit Plan. This will include adding further guide questions and criteria to address the multi-functional benefits of green infrastructure. At Deposit Plan stage, the SA of (reasonable alternative) candidate sites will build upon the criteria applied to date to provide more detailed analysis including a proportionate level of landscape and visual appraisal.
- 3.264 Furthermore, Natural Resources Wales consider that the assessment underestimated likely adverse effects as the Mid-Growth Option (through candidate sites) and Strategic Policies 1, 3, 6, 9, 10, 11, 13, 15 and 16 are likely to result in some adverse landscape and visual impacts. An inconsistency was also identified between SP17 and other strategic policies regarding whether landscape character will be protected from significant adverse or all adverse effects. Moreover, Natural Resources Wales advised that a landscape and visual

appraisal using LANDMAP is required to inform candidate site assessments, whilst considering Special Landscape Areas. Additional or updated environmental baseline and policy review information was also highlighted, which should be referenced in the next SA report.

- 3.265 These points are noted by the Council. The SA of growth options and strategic policies (and all other substantive components) presented at LDP Preferred Strategy stage is considered robust and the assessment conclusions remain valid. The SA is being undertaken on an iterative basis and reporting will be fully updated to align with the Deposit Plan, with more detailed analysis included at that stage where required.
- 3.266 As noted by NRW the emerging Replacement LDP must be read as a whole, and it should be stressed that the emerging Replacement LDP will provide an overarching policy framework rather than itself delivering individual developments. This means that strategic policies which provide support 'in principle' for growth levels or development types, but which do not identify specific sites or set out criteria to assess all environmental impacts (e.g. landscape), would not themselves necessarily result in adverse environmental effects. Rather, all substantive components of the emerging Replacement LDP must be considered in tandem, taking account of environmental safeguards which are included within specific strategic policies and therefore do not need to be repeated. All strategic policies will be reviewed in the preparation of the Deposit Plan and any inconsistencies in policy wording will be addressed before the Deposit Plan SA is addressed.

Question 11

This assessment seeks to identify if the existing LDP Development Management Policies are functioning effectively, whether any changes are likely to be required (to reflect contextual changes and legislation) and if appropriate carried forward as new policies in the Replacement LDP.

Do you agree with the recommendations above?

- 3.267 The HBF cite general support of for the suggestions made in the document, “Although we consider it would be clearer if the action reflected the commentary”. Examples are provided where, “In a number of cases the commentary talks about needing to amend/update the policy, but the action says carry policy forward with no mention of amendment”. Therefore, the HBF suggest, “It would be clearer if it said carry policy forward subject to the amendments/updates”. These comments are noted by the Council and will be considered in preparation of the Deposit Plan.
- 3.268 DPP (on behalf of Llanmoor Homes), “Support the review of Policy ENV2 – Green Wedge”. DPP state, “Where it can be evidenced that appropriate land could be released for development whilst still maintaining the overall purpose of a Green Wedge designation, the Authority should move forward confidently with such proposals”. The Council notes these comments. Green Wedge designations will be reviewed in light of Planning Policy Wales.

Question 12

This assessment identifies new Development Management policies that will be included in the draft Deposit Plan.

Do you agree with the recommendations above?

- 3.269 Barton Willmore support the recommendation for mixed-use regeneration sites to be identified through a new policy. It is stated, “There will be cases where such sites are sustainably located in stronger market areas, not reliant on significant infrastructure and can commence within the shorter term”.
- 3.270 The HBF, “Has no objection in principle to the proposed new DM policies suggested in the document”. However, the HBF highlight the need to ensure low carbon and energy efficiency policies align with national policy standards and building regulations, whilst providing, “Flexibility to allow development to react to the fast changing agenda and available solutions around this policy area”. Similarly, several commentators do not support references to building standards beyond building regulations. These comments are noted and will be considered in policy development.



Community Engagement

Bridgend County Borough Council Replacement LDP Draft Preferred Strategy

Community & Town Council Events Issues Report

November 2019

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Appendix 4 List of CTCs who attended at least one event

1.0 Context

Planning Aid Wales has been instructed by Bridgend County Borough Council (BCBC) to support the community engagement activity in relation to the Bridgend Replacement LDP - Preferred Strategy.

Our instructed brief was as follows:

To prepare and deliver five community engagement events between September - November 2019 in accordance with BCBC's Delivery Agreement. The events were targeted at town and community councillors operating within the Bridgend County Borough Council area. However, following discussions with BCBC the third event at Cefn Cribbwr was cancelled due to lack of interest and an additional session with Coychurch Higher CTC was arranged.

To deliver the brief our work involved:

- Analysis and understanding of the Preferred Strategy.
- Review of other key documents and activities including the Delivery Agreement, recent LDP engagement activity, previous barriers identified, key stakeholder contacts etc. and discussions with Planning Officers as required.
- Selecting, defining objectives and programming methods of engagement for the events.
- Attending all events as facilitators for discussions and to encourage understanding of the current plan working together with BCBC Officers. The broad purpose of the events was to raise awareness and encourage responses to the Preferred Strategy consultation which had a deadline of 5pm on Friday 8 November 2019.

In relation to the events our role was:

- i. To agree clusters of CTCs for the events and arrange suitable venues and dates for the event.
- ii. Introducing the purpose, aims and key stages involved in the LDP preparation process.
- iii. Explanation of the key themes and proposals put forward in the Preferred Strategy.
- iv. Organising and coordinating break out groups and discussion on planning issues and matters raised in the Preferred Strategy.
- v. Chairing a plenary session to capture initial feedback on the Preferred Strategy.
- vi. Advise on next steps and how communities / stakeholders can input into the process.
- vii. Prepare a report of feedback and issues raised for BCBC Planning Officers.

In addition to the above, the session included a short introduction to Place Plans, in response to the potential role for such plans within the Preferred Strategy.

As part of the process the following work was carried out by the Council:

- i. Provision of all relevant planning documents.
- ii. Invitations to interested parties to attend events.
- iii. Provision of details of the Preferred Strategy.
- iv. Translation of material to Welsh if required, this was not required for the events held.

The role of Planning Aid Wales in the drafting of the issues report is to report back the issues and comments raised by CTC representatives at each event. Therefore, the issues and comments listed within this report are solely those of the CTC attendees who attended each event and do not represent the views of Planning Aid Wales.

2.0 About Planning Aid Wales (PAW)

Planning Aid Wales is a registered charity that advocates and supports community involvement in planning in Wales. Founded in 1978, we have 40 years' experience of helping individuals and community groups to understand and engage with the planning system. Our core services include delivering planning training to a range of audiences, developing easy read planning guidance and a free planning advice helpline. We are an organisation that has been commissioned for many community engagement in planning projects in Wales; we have built a significant repository of engagement methods, tools and techniques and regularly publish news on good engagement practice.

We recognise LDP preparation is an important avenue for securing more effective public involvement in planning; our current business plan identifies LDP review as one of the three elements in the planning process on which we focus our engagement efforts.

Planning Aid Wales is an advocate of meaningful community engagement in planning. Through our work, we seek to raise the knowledge and capacity of communities to engage, but not just in the activity at hand - we seek to enable people to effectively participate in planning activities on an ongoing basis.

As an independent third party organisation, we have found time and again that communities are willing to engage with us, even where Local Planning Authorities have encountered barriers to engagement in the past. As part of our process, we encourage active collaboration between Local Planning Authority staff and community groups, thereby building better relationships for future engagement. We take no view on any local policy or specific development; we only support individuals and communities to express their own views effectively.

We recognise that the planning system can be complex and the needs / wants of communities do not always align with other interests. We manage expectations by helping our beneficiaries understand that planning is a holistic system that seeks to address a wide variety of priorities, and clearly explain the scope and limitations of what the planning system (or particular activity) can achieve.

Planning Aid Wales is a 'not for profit' body; any income generated from our work is utilised to further support our aims of facilitating greater community engagement in planning across Wales.

3.0 Community and Town Council Preferred Strategy Engagement Events

The CTCs were divided into 5 groups to reflect their geographical location and as a means to focus debate at each event. The venues were then selected to be as centrally located to all CTCs in each group. However, it was also made clear that any CTC representative from outside each group could attend another event if required.

The CTCs are listed below, and the number is referred to in the detail of the event below.

No.	Name	No.	Name
1	Maesteg Town TC	11	Coychurch Higher CC
2	Garw Valley CC	12	Cornelly CC
3	Ogmore Valley CC	13	Laleston CC
4	Llangynwyd Middle CC	14	Coity Higher CC
5	Llangynwyd Lower CC	15	Pencoed TC
6	Pyle CC	16	Porthcawl TC
7	Cefn Cribbwr CC	17	Merthyr Mawr CC
8	Newcastle Higher CC	18	Bridgend TC
9	Ynysawdre CC	19	Brackla CC
10	St Brides Minor CC	20	Coychurch Lower CC

A map of CTCs is included at appendix 1.

Five events were held:

1. Monday 23 September 6pm – 9pm Maesteg Town Hall
CTCs 1,4,5
2. Monday 30 September 6pm – 9pm Ynysawdre Parish Room
CTCs 2, 9, 10, 11
3. Friday 4 October 5.30pm – 8.30pm Brackla Community Hall.
CTCs 18,19,20, 14, 15
4. Monday 14 October 6pm – 9pm High Tide Inn, Porthcawl
CTCs 6, 12, 16

The event scheduled for 7th October 2019 at Cefn Cribbwr Green Hall was cancelled due to lack of interest. Any CTCs that had not been able to attend any of the schedule events were also asked if they would require an individual discussion of the issues. One CTC Coychurch Higher CC accepted this invite and the following event was held:

5. Monday 4 November 2.30pm – 5pm Heol y Cyw Welfare Hall
CTCs 11

It was advised by BCBC at the outset of the project that LDP Officers would not attend the events to allow for an independent discussion of issues.

Format of events

All events followed a similar format, as follows.

Mark Jones, Planning Engagement Officer, Planning Aid Wales, introduced the event and delivered a presentation which covered the following matters:

- Explanation of Planning Aid Wales and their role as independent facilitators for the event.
- A brief explanation of planning policy and LDP procedures and processes to set the context for the preferred strategy.

At the end of the presentation a brief question and answer session took place to address any issues on the process.

Mark Jones then delivered a more detail presentation on the content of Bridgend Replacement LDP Preferred Strategy consultation document. Questions were invited

and where possible responded to, the issues raised were also noted for inclusion within this report. Delegates were then divided into groups and each group was asked to identify key planning issues for their area and comments in relation to the Preferred Strategy. Participants were asked to note these comments on flip charts. Planning Aid Wales participated with each group to listen to the discussions and also to pose queries to facilitate discussion. These papers were then collected at the end of each session by Planning Aid Wales to list the issues in this report.

Mark Jones clarified the position regarding candidate sites.

Given the role for Place Plans in the planning system, Mark Jones made a short presentation on principles of Place Plans and signposted various references that could be explored to learn more on this issue.

The event concluded with Planning Aid Wales repeating the deadline for comments on the Preferred Strategy of 5pm 8 November 2019. It was emphasised that this was the most appropriate time to make meaningful comments to influence the LDP as once the document moves to deposit, although this will be subject to consultation, and then examination the opportunity to influence the plan will become less.

A copy of the presentation is included at appendix 2.

Event attendance

All CTCs were invited to attend at least one event, a copy of the invite issued by BCBC is included in appendix 3. The table below summarises the attendance at each event

Event	No. Attending
Maesteg Town Hall	4
Ynysawdre Parish Room	5
Brackla Community Hall	13
High Tide Inn, Porthcawl	10
Heol Y Cyw Welfare Hall	5

A list of all CTCs who attended at least one event is provided in Appendix 4.

4.0 Summary of Issues Raised

The events generated a number of views and identified a number of issues from CTCs and these are listed in section 5 and 6 of this report. In summary there were a number of common issues which are summarised below under the following broad headings:

- Infrastructure
- Schools
- Affordable Housing
- Town Centres
- Employment and Industry
- Environment and Biodiversity

Infrastructure

One issue that was raised consistently at all events was with regard to infrastructure. There was a feeling that new development was coming forward without the necessary infrastructure to support it. In particular concerns were raised regarding road and transport infrastructure. A number of delegates felt the road system and capacity across the Borough was not sufficient to accommodate new developments. A common view was that development was coming forward which increased congestion and highway issues and these matters were not being adequately addressed through the planning process.

At the same time, it was acknowledged by some attendees that planning policy did look to reduce the use of cars in new development however at the same time concerns were raised that public transport was insufficient to replace the use of cars. Therefore, new development would always generate car movements. Respondents' comments suggested that the availability and accessibility of public transport did vary across the Borough and between towns and smaller communities. Furthermore, some respondents suggested that there was a lack of parking spaces in towns and settlements, which also contributed to the problem.

A particular issue that was raised in relation to transport was Jct 36 of the M4 which a number of respondents said often suffered from serious congestion, including tailbacks along slip road and motorway, and any new development which would lead

to use of this junction would worsen the situation. Some comments also suggested that development elsewhere could trigger a similar scenario at Jct 35.

Other aspects of infrastructure concerns related to health facilities such as GP Surgeries. It was acknowledged that such matters were controlled by Health Authorities, but respondents suggested that where it was felt such services were full this should be a consideration to any proposed residential development.

Schools

A number of respondents at all venues raised the issue of impacts to schools. It was felt that current schools were at capacity and as such any new residential development was increasing the pressure on places and catchment areas. The main area of concern seemed to relate to primary schools with a greater capacity being available at secondary schools. Some delegates felt this issue was not being addressed and that planning obligations were also not addressing the issues that arise from increasing family numbers.

Housing

Queries were raised in relation to the housing need. Whilst the calculation to provide the balance of housing required was explained there were a number of views that considered this was still not justified. Another aspect that was raised at a couple of venues related to the relationship of the employment land provision and housing. There was a view that if 60 Ha of land was required to provide 4995 jobs then the housing requirement did not reflect this. Another common comment related to the role of towns and villages within the Borough as dormitory settlements where people will travel to work elsewhere in particular Cardiff and, as such, was the housing requirement in part providing housing for the needs of other areas.

Affordable Housing

Affordable housing was identified by a number of respondents as being a key issue. It should be noted at the outset that there was some misunderstanding as to what affordable housing was e.g. cheaper market housing or the equivalent of council house provision. On exploration of the affordable housing issue it appears that the concerns would cover the broad spectrum of affordable housing including low cost to buy,

shared equity and social rent. There was an overall recognition that affordable housing was required and should be adequately addressed in the LDP.

Town Centres

Concerns were raised on the current situation of town centres, there was a general feeling that they were under pressure. It was considered that too many shops were closing and remaining vacant. One CTC also pointed out that the viability and attractiveness of a town centre also affected smaller settlements that used the larger towns such as Bridgend as their main centres. It was considered that there was a need for more investment and other uses to boost town centres. Parking issues were again raised as an obstacle to using town centres, a particular point was emphasised regarding disabled parking. Also, the lack of public transport meant the car was still the main mode of transport to such centres. On exploration of this issue, changes in retail patterns e.g. the internet, business rates and other fiscal issues were identified as a constraint to providing a vibrant town centre. It was explained that the planning system and the LDP cannot really address the fiscal issues and also the issue of town centres is national issue across Wales and the wider UK and is subject to a current national debate.

Employment and Industry

Overall there did not seem to be any major issues with regard this matter. However, some attendees questioned whether there was a manufacturing base for the Borough. In addition, as mentioned above there was concern in relation to new developments given the current infrastructure concerns. Some of the more rural CTCs and those north of the M4 suggested there was scope for small scale employment uses within these areas. A number of people identified current vacant sites that could be regenerated for this purpose. The potential future of the Ford plant was raised at most of the events and whether the LDP was addressing the potential implications of this issue. Although the potential of INEOS coming to the area was good it was felt this would only partly address the issue if Ford was to disappear altogether.

Environment and Biodiversity

There was a general consensus across the events to safeguard the environment and biodiversity. A number of attendees referred to the need to protect green spaces. It

was questioned whether some of the strategic sites identified would lead to a loss of such land.

Regeneration and Sustainable Growth Strategy

In relation to the Council's preferred strategy there were a mix of comments. Whilst there appeared to be a general understanding of the strategy there were concerns raised on some aspects. It was felt by some that there was scope for development in areas outside the proposed growth areas. In addition, it was considered that due to infrastructure issues some of the proposed growth areas would struggle to satisfactorily accommodate new development. Some of the issues raised and detailed in the other CTC responses, provided in this report, also relate to the overall preferred strategy.

5.0 Issues Raised at Each Event

As mentioned previously break out discussion groups were held at each event and attendees were asked to identify and list issues which they felt currently existed and could be addressed within the Replacement LDP. A list of the issues raised by the CTCs are detailed below, under the heading of each event.

Event 1. Maesteg Town Hall Monday 23 September 6pm – 9pm

CTCs who attended:

Maesteg Town Council, Llangynwyd Middle CC, Porthcawl TC.

Issues raised:

In relation to Maesteg and Llangynwyd Middle:

Infrastructure

- Revlon site in Maesteg – cost of development due to adit. Welsh Government to help fund development.
- Oakwood Colliery.
- A4063 – Tondu site. Potential 400 houses. Concerns regarding access and road capacity.
- Community hubs.
- Cycle tracks. There is a lack of cycle tracks in the Maesteg area. Llangynwyd to Tondu track not happening.
- The loss of community facilities was an issue, in particular public toilet provision was identified. The loss of the bowling green was another example.
- Education – primary school is old and full, there is no education space.

Parking and Traffic

- Traffic issues in Maesteg.
- Parking issues around following schools Cwmfelin Primary School, Plasnewydd Primary School, Garth Primary School. Also, more houses in Llangynwyd will add to issue i.e. knock on to shops etc.

- There are examples of developments where no parking provided such as Beethovens – 6 flats.
- There is a lack of public transport. In Llangynwyd there is a loss of public transport. How do people get to work elsewhere? There was a feeling that there was a depopulation of the towns which adds to the problem. It was felt public transport from Maesteg town was good including the availability of the train service.
- The Metro will have no benefit for 25 years.
- Llangynwyd Railway Station.

Environment and Ecology

- Historical Right of Way in Llangynwyd Middle. It was felt the right of ways were in a poor condition. Some need reopening. This has an impact upon access to the countryside.
- Agricultural building too close to residents – noise when calves separated from mothers.
- Protection of woodlands, such sites require protection to resist development e.g. at Sychbant and woodland between Llangynwyd and Cwmfelin.
- Veganism issues.
- Forestry management, it was felt the LDP should consider such matters as well as agriculture.

Housing

- Affordable housing to rent – Porthcawl, Maesteg and Llangynwyd.

Employment

- There is a need for to create more employment opportunities in the area. Including the provision of green jobs.
- Where is the strong manufacturing base? What about the impact from loss of Ford? It was felt public transport was needed to link to employment opportunities.

General LDP issues

- Projects such as the redevelopment of the Town is a good as this provides a boost to the local economy.
- Elderly population. The population is ageing and there is a need to accommodate and meet the needs of all age groups.
- Youth issues.
- It was considered that communities can accommodate more development in some areas.

In relation to Porthcawl:

- Regeneration – Eastern Prom and the lease on Salt Lake.
- Residential dominated development. Although a supermarket is to be developed on Green Lane.
- There are parking issues within Porthcawl.
- Lack of consultation.
- Wig Fach – residential caravan site, access - potential residential development.
- St Johns School site entry and road access.
- Porthcawl Hotels parking issues has an impact upon tourism in town.

With regard to the specific questions raised in the LDP.

Q1. In relation to the growth of dwellings, what about education facilities to meet the increase in need in these areas? Younger families will mean more children and these needs must be met. Also, the provision of play areas. Further, to education it was felt that new residential development should be accompanied by other community facilities. Development funding for such facilities?

Q2 Bridgend seems to be growing larger, though can understand the principle of the policies. The Llynfi Valley typology was ok. Not using valley land only for business.

Q3 No.

Q4 There is a need for funding to allow business to diversify. Also make it easier for businesses to set up.

Q5 Tourism in Maesteg – capacity issues. Historical features.

Q6 Generally understand broad principle. Public funding for facilities is decreasing requiring individual clubs to take over. The loss of the bus station at Bridgend, there was a request to local communities to fund this. There is a need not just for new developments but also to retain and maintain what we have already got.

Q8 Footpath issues

Event 2. Ynysawdre Parish Room Monday 30 September 6pm – 9pm

CTCs who attended: Ynysawdre CC, Ogmore Valley CC, St Brides Minor CC, Garw Valley CC, Coity Higher CC, Newcastle Higher CC

Issues raised:

Infrastructure

- Lack of infrastructure / health / transport.
- Public transport (lack of) – Coity. Garw – no trains and public transport cuts.
- Too much development for infrastructure, e.g. Jct 36, M4, Broadlands, Tondu.
- No plan for GP surgery – existing ones overstretched.
- Lack of places in schools (and traffic near schools).
- Valleys gateway overdeveloped – no trunk road / infrastructure.
- Road system is narrow and there have been accidents.

Environment/ Biodiversity

- Where are preferred sites for green / open spaces?
- Lack of green spaces and possible loss of more.
- Grazing rights – common land.
- Maintain countryside – there is overdevelopment, e.g. Laleston, Penyfai. Not Ogmore Vale / Llynfi which needs more modern houses and bring in or retain people in communities.

General LDP Comments

- Do not connect FGA with other policies such as Active Travel and taking away playing areas.

- Brownfield sites such as Maesteg washeries to regenerate areas (Valleys) and take away S106 and social housing / ransoms strip requirements to make these areas more desirable (incentives) in areas perceived as 'desirable'.
- Valleys are buy to let housing.
- Need for affordable housing / social housing not being met.
- Bridgend County Borough becoming commuter town especially in Valleys Gateway.
- Preferred Strategy consultation should include reference to specific candidate sites.
- LDP is too complex to involve communities. Planning system too full of jargon.
- Developments take too long to fully complete – i.e. adoption.
- Car parking issues and development will increase cars.
- Not a strong manufacturing base
- Congestion from travel to Cardiff
- Encourage small businesses across the whole area.
- Need for bigger industry – well paid jobs
- Loss of Ford.
- Active travel not rolled out as it is slow and is not where it is needed.
- Schools are closing within valleys areas No secondary school in the Garw Valley
- Redevelop the old school site
- Insufficient resources in the planning dept – particularly re smaller sites – no checking of projects.
- Valleys area needs tourism
- Reuse existing housing, bring back empty properties rather than consider new sites
- Industrial sites currently empty can these provide or enhance employment need
- How do the Council define sustainability?

With regard to the specific questions raised in the LDP.

Q1 Infrastructure needs to be in place for new development. Focussing on the growth areas too much, loss of strategy north of M4. Who are houses for? Commuters to Cardiff? How are housing targets being considered? More of the target north of M4. Need a broader scope to strategy. Smaller scale employment and housing in the Valleys area. Need more affordable housing – social rent and low cost to buy. Provide balanced communities.

Q2 Preferred Strategy fails for Ynysawdre. Just development for housing but there is a need for other forms of development such as retail and employment. Preferred Strategy will not change things. Macarthur Glen has had an impact upon towns. Upper floors in town centre for housing to meet the housing need.

Q4 No investment in infrastructure. Austerity is incompatible with sustainable development. Not just a case of no roads but the roads are too narrow.

Event 3. Brackla Community Hall Friday 4 October 5.30pm – 8.30pm

CTCs who attended: Brackla CC, Merthyr Mawr CC, Coychurch Lower CC, Bridgend TC, Coity Higher CC

Issues raised:

Infrastructure

- Infrastructure – schools, insufficient spaces, new schools too small. Highways, capacity (Broadlands, City, A48, Park St), doctors, chemists, PO etc.
- Infrastructure, e.g. J36, Pencoed etc.
- Pressures on NHS – can't just build surgeries and hospitals as haven't got doctors.
- Pressures on schools – need also to work with surrounding LAs as pressures can cross over boundaries.
- Pressures on police and all public services including waste.
- Services not working together when planning - don't talk to each other!
- New development has impact on other services.

- Road system is not adequate for development when it is approved.
- Policy does not reflect cumulative impacts e.g. a development of only 100 cars but this would be on top of the previous 200 cars.
- Sport fields as candidate sites – lack of policy on protection of sports facilities in draft.

Housing

- Affordable housing needed and a clear definition of what affordable housing is.
- Stronger policies for affordable housing to avoid loss of such provision on sites e.g. Parc Derwen.
- Need for more houses in the right places – location!

Employment

- Employment – Island Farm 11.5Ha – 6.5Ha, high skilled jobs.
- Question over employment – are there enough jobs? If there is a need to travel, we haven't got the transport structure.
- Second phase of science park reduced.
- Need higher paid jobs higher technology jobs.
- Is Bridgend a suburb of Cardiff or an employment base? What is Council vision for employment?
- More robust employment policy needed.
- Cardiff City New Deal should help Bridgend and there is a need for the LDP to link to this.
- There is an opportunity for small scale start-ups.

Town Centres

- Use vacant upper floors for residential use.
- Is there adequate parking in town centres. Need more parking.
- Pedestrianisation excludes activity.
- Provide residential sites in town centres.
- Despite policy to reduce car use the use of the car will continue.
- Multi use of cars for new developments e.g. car clubs.
- Provision of a park and ride for the train.

- Disabled parking also an issue.

Environment/ Biodiversity

- Protection of playing fields, parks and green spaces.
- Ecology.
- Environment – in general, loss of habitat, green lands, wildlife. Active travel removing hedgerows.
- Development affecting environment.
- No wildlife corridors just islands.
- Increase in housing will lead to impact on the environment.

Traffic/ Parking

- Public transport.
- Congestion – town, Bridgend retail park.
- Increasing pressures on transport and highways

Heritage

- Protection of heritage.
- Heritage protection is currently working but this should be monitored and should not fall off.

Event 4. High Tide Inn, Porthcawl Monday 14 October 6pm – 9pm

CTCs who attended:

Porthcawl TC, Cornelly CC, Pyle CC

Issues raised:

General LDP Comments

- LDP not accountable or ratified by local councillors.
- Why are BCBC passing 1000's of housing applications without appropriate infrastructure?

- BCBC are making decisions on communities where they have no input from residents of those communities who know best.
- The current LDP fail to take tourism/leisure into account in a seaside town.

Housing

- Why are there private developments and yet no 'social' housing for local people?
- Covenants exist on Sandy Bay and yet housing has been planned.
- Emissions will be excessive with increased housing leading to more cars. Pyle & Cornelly have exceeded their capacity.
- The flats/houses planned for Salt Lake, seaside prime land, will be expensive and holiday/part time usage flats, as has happened in Jennings Building.
- Born and bred children can't afford to buy.
- Pyle and Porthcawl is at capacity for housing.
- Housing needs to be built where it's needed (Maesteg) and affordable and not built just to fill quotas.
- Sandy Bay suffers with sand – hence the name. Sandy Bay can be cleared, and more sand would bury it. House boilers in parts of Porthcawl fill with sand in the filter. Gas boilers would be dangerous to homeowners on Sandy Bay!
- Developers banking the land.
- Need more affordable homes - to keep the youngsters in the town.
- Rise in number of Airbnb and holiday homes and less affordable homes.
- In delivering homes - are empty houses being taken into consideration? .
- Building houses will not create jobs.
- 1500 houses built in Cowbridge and only a few sold.
- We need more houses for youngsters of Maesteg. Porthcawl houses can be made available for Maesteg youngsters.
- Porthcawl needs mixture of housing not only second homes and high rented houses.
- Second homes are a big problem in Porthcawl.
- Majority of houses bought under right to buy scheme.
- Park areas taken out of LDP.
- The new housing that is coming who is getting it?

- It's the developers that buy the houses.
- The problem is that the 'buy to rent' is artificially inflating the market price. People renting the houses (the buy to rent houses) are hardly left with any saving to buy a house.

Parking and Highways

- Porthcawl has two roads in/out the volume of traffic especially on sunny days is at breaking point and yet more houses are planned for Danygraig, Salt Lake and Sandy Bay.
- Why is there no consideration for a light railway/tram to Pyle station instead of Park & Ride?
- Council is trying to develop a transport hub but the infrastructure especially the roads won't be able to cope with the new development. There is not enough room for expansion. Whole infrastructure is a problem and there should be a better and proportionate infrastructure development i.e. roads, doctors, schools etc.
- Bus routes being cut - have to drive halfway to Cardiff. There can't be development until public transport is there in place to support it. No frequent buses from Bridgend. In 11.5 million pounds, we get a train station only.
- S-106 money going elsewhere – to Bridgend and other areas.
- The two major roads towards Porthcawl gets clogged up in the summertime.

Tourism and Heritage

- LDP conflicts with tourism.
- Why haven't BCBC protected and preserved BCBC historical assets.
- LDP is going against a Conservation Area re Salt Lake with 5 storey flats... out of keeping for the area.
- Tourism / leisure conflicts with strategic objectives.
- LDP needs to take into account the need for promoting tourism.
- LDP conflicts with BCBC's policy on tourism- e.g. BCBC's policy on tourism is to cut down carbon emission by 2025 - how can that be achieved as towns like Port Talbot are beyond their capacity with all this development.

General / Other issues

- How is LDP going to reconcile conflicting difference? Ignore them??

- How did Coney Beach end up in the area values of the LDP.
- Delivery of under-utilised sites – Salt Lake is highly utilised, misleading!!
- With every single ward the population is increasing.
- In the regeneration project some sites put forward are on Coney beach and has got approval from the Council. How is it possible to build on a beach??
- Delivery of underutilised sites for redevelopment. The term underutilised sites is misleading. e.g. the car park in Porthcawl

Biodiversity

- SOBJ4: to protect and enhance distinctive and natural places – this conflicts with BCBC pulling out of maintaining Kenfig Nature Reserve.
- There should be bio-diversity policies. (NRW, ecology etc.)

Employment

- How did BCBC get to a projection of 4995 jobs – wishful thinking!

Pyle and Kenfig Hill

- Infrastructure – village layout not suitable for further developments. A transport rail hub has been muted for village. Road would not cope with extra traffic
- Cuts to public transport – service bus from Bridgend to Porthcawl via Pyle has been cut. Train services inadequate. Commuters need to travel to Pencoed for regular trains and park & ride.
- Education – not enough primary places to support our current population
- Traffic – not enough school crossing points. Unfilled school patrol officer position. Roads too narrow for further expansion. Insufficient parking.
- Health care provision – increased waiting times for appointments. Are care homes sufficient for our aging population
- Environmental impact – pollution from industrial estate which has been expanded from its original planned size over many years. Recycling plant will increase pollution and traffic to dangerous levels. It is also planned to be placed in very close proximity to our secondary school. Open cast regeneration project – stalled? Some might say robbed.

Event 5. Heol y Cyw Welfare Hall Monday 4 November 2.30pm – 5pm

CTCs who attended

Coychurch Higher CC

Issues raised:

Infrastructure

- If more housing needed infrastructure needed first. Road suffering from heavy traffic. Drainage issues in some locations.
- Children in the area increasing but need to travel to Pencoed for school both primary and secondary. Schools places are at capacity. Travel to school by bus from area.
- No need for more development. Put things right before more development. There should be no planning permission for larger developments until problems solved such as infrastructure, drainage etc.

Parking and Transport

- Public transport issues – currently poor and declining further.
- Pedestrian issues as dangerous to walk along roads. No walking paths or cycle paths.
- Healthy lifestyle not promoted due to road system.
- There is a lack of car parking in the area.
- Road and traffic issues on road from Coity and Spencer Road. The road layout and system make matters worse in Coity.
- Junction 36 of M4 is a major issue.

Community / Village Issues

- Village considerations in Heol Y Cyw not taken into account, village is in the countryside.
- Current view of village: no shop, not really a village since the school closed. Community Hall currently has a couple of groups.
- Plans for allotments within the village shown on previous plans. Car park also. The loss will impact upon buses.
- No more housing; need more shops and bus services.

- There is a park and playing fields which are used but no lights.
- However, one off single houses may be acceptable. Inside settlement boundary (*Comment: there was a split view on whether this should only be inside settlement boundary*).
- Currently one allocated site at the school it is understood this is affordable housing.

Employment

- Not much employment in the area. Rockwell is the main employer. Also, Afan Landscape and Biomet. Other work is seasonal such as in the pub.
- Current employment estates are not full so why look to build more?
- Existing employment sites are empty.
- Has the impact of the loss of Ford been considered?

Pencoed

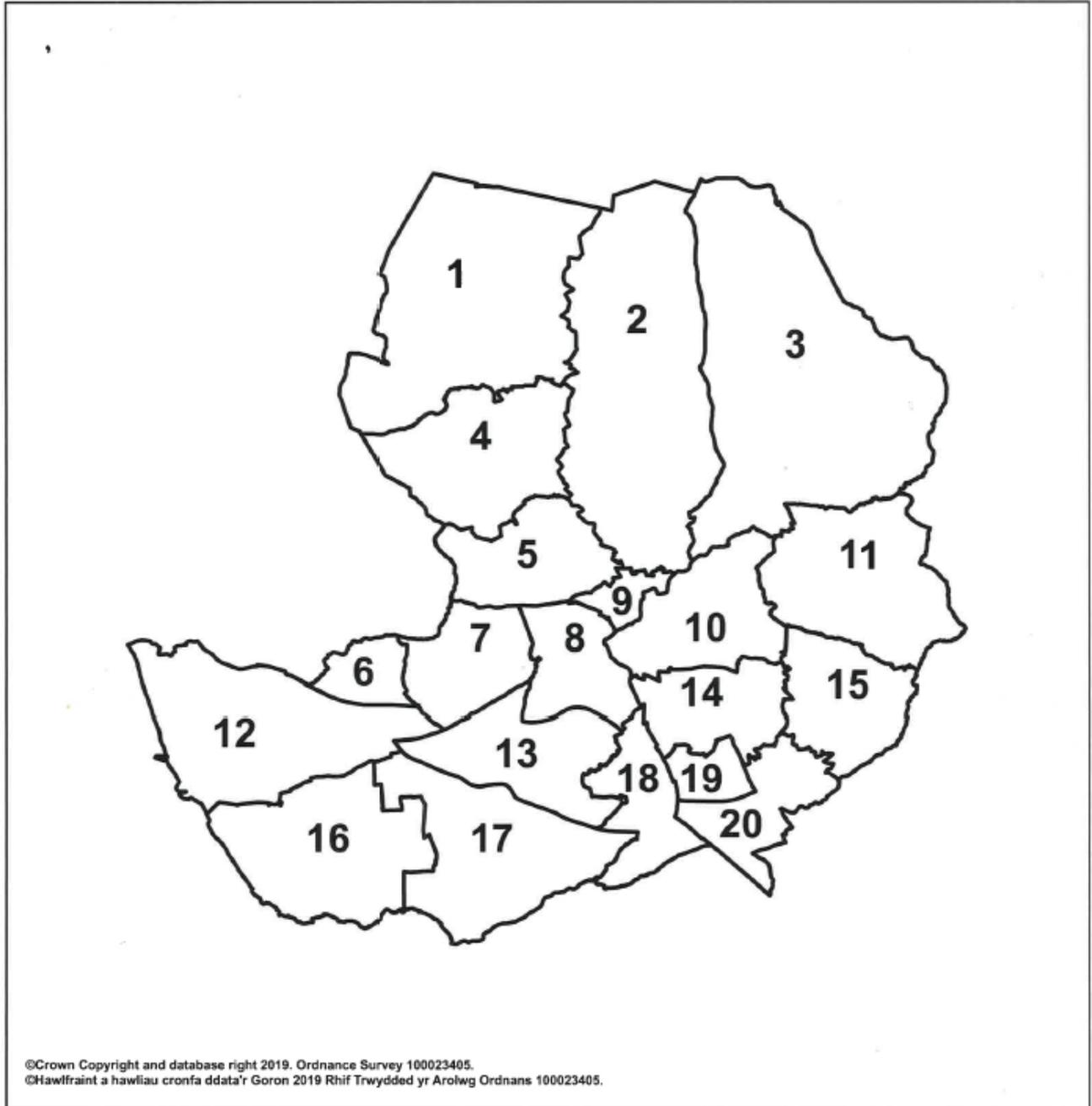
- With regard to housing provision the Preferred Strategy mentions Pencoed and Hinterland but what is the hinterland?
- With regard to settlement policy it is considered that Pencoed needs to be sorted before any new development - schools are full, Doctors are full.
- Pencoed Strategic Site – road system needs to be addressed before the strategic site is considered. It is accepted that the by-pass does help. This will lead to current issues at Junction 36 occurring at Junction 35. There is a restriction due to the floodplain.
- Pencoed Strategic Site – Flooding of roads in the area needs to be addressed.
- Drainage issues. Pencoed to Heol Y Cyw has standing water in the road when there is heavy rain. Roads to Bryncethin also suffer flooding.

Other/ General Issues

- Has the impact of development from within RCT been assessed?
- The nearest towns can have an impact for villages and villagers. There is a need to make the towns more attractive for villagers if there are no facilities in the village.
- Common Land issues.
- Population is ageing due to incomers into the area.



Town and Community Councils



- | | |
|---|---|
| 1 - Maesteg Town Council | 11 - Coychurch Higher Community Council |
| 2 - Garw Valley Community Council | 12 - Cornelly Community Council |
| 3 - Ogmores Valley Community Council | 13 - Laleston Community Council |
| 4 - Llangynwyd Middle Community Council | 14 - Coity Higher Community Council |
| 5 - Llangynwyd Lower Community Council | 15 - Pencoed Town Council |
| 6 - Pyle Community Council | 16 - Porthcawl Town Council |
| 7 - Cefn Cribbwr Community Council | 17 - Merthyr Mawr Community Council |
| 8 - Newcastle Higher Community Council | 18 - Brigend Town Council |
| 9 - Ynysawdre Community Council | 19 - Brackla Community Council |
| 10 - St Brides Minor Community Council | 20 - Coychurch Lower Community Council |

Appendix 2 to Appendix 1

**BRIDGEND COUNTY BOROUGH COUNCIL
LOCAL DEVELOPMENT PLAN**

COMMUNITY AND TOWN COUNCIL WORKSHOP

NOVEMBER 2019



Planning Aid Wales
Cymorth Cynllunio Cymru

1

Local Development Plans

Why are LDPs important?

- Framework for development
- Investment & infrastructure
- Protect environmental assets
- Primary 'material consideration'



Planning Aid Wales
Cymorth Cynllunio Cymru

4

MARK JONES

PLANNING ENGAGEMENT OFFICER

PLANNING AID WALES



Planning Aid Wales
Cymorth Cynllunio Cymru

2

What do LDPs cover?



Planning Aid Wales
Cymorth Cynllunio Cymru

5

WORKSHOP STRUCTURE

PART 1 **General LDP Policy and Procedures**

PART 2 **BCBC Preferred Strategy**

PART 3 **Candidate Sites**

PART 4 **How to Get Involved**



Planning Aid Wales
Cymorth Cynllunio Cymru

3

What do LDPs contain?

- Policy Context, Key Issues and Drivers
- Vision, Strategy and Strategic Policies
- Specific Policies
- Implementation and Monitoring
- Maps with land allocations



Planning Aid Wales
Cymorth Cynllunio Cymru

6

LDP preparation process



7

Questions?



10

LDP Examinations

- Public Inquiry by Planning Inspectorate

Three key questions (tests of 'soundness'):

1. Does it fit? - is it consistent with other plans?
2. Is it appropriate? - does it address the evidence?
3. Will it deliver? – will it be effective?

8

Discussion !



11

Key principles

Increased understanding

+

Early & ongoing engagement

= Increased influence

9

Replacement Bridgend Local Development Plan 2018 to 2033

12

WHERE ARE WE NOW?

- COMMENCED REVIEW 2017
- REPLACE LDP
- REVIEW REPORT 30/04/18 – 28/05/18
- DELIVERY AGREEMENT 30/04/18 – 28/05/18
- CANDIDATE SITES 05/11/18
- PREFERRED STRATEGY 30/09/19 – 08/11/19



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SUMMARY OF KEY ISSUES

- Strong manufacturing base
- Ageing Population – need to counter balance
- Regionally, significant employment links with neighbouring authorities.



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VISION

“... resulting in the development of a safe, healthy and inclusive network of communities that connect more widely with the region to catalyse sustainable economic growth.....

“... This vision will be achieved through maintaining and developing strong, interdependent, connected and cohesive settlements, whilst protecting and enhancing the County Borough’s environmental and heritage assets.....



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STRATEGIC OBJECTIVES

- SOBJ1: To create high quality sustainable places (Placemaking)
- SOBJ2: To create active, healthy, cohesive and social communities
- SOBJ3: To create productive and enterprising places
- SOBJ4: To protect and enhance distinctive and natural places.



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SUMMARY OF KEY ISSUES

- Bridgend, Porthcawl, Pyle and Pencoed – capacity for sustainable growth - Moratorium west of level crossing in Pencoed.
- Llynfi Valley greatest scope for growth across the three valleys. Omore and Garw Valleys could grow through self build and custom building.
- Valleys Gateway successful major focus for residential development. Capacity issues M4 Jct 36



15

PREFERRED STRATEGY OPTIONS

- Continuation of the existing LDP Regeneration Strategy
- Public transport hubs and strategic roads corridor strategy
- Prioritise growth to the north of the M4 (Valleys Strategy)
- Regeneration and sustainable growth strategy



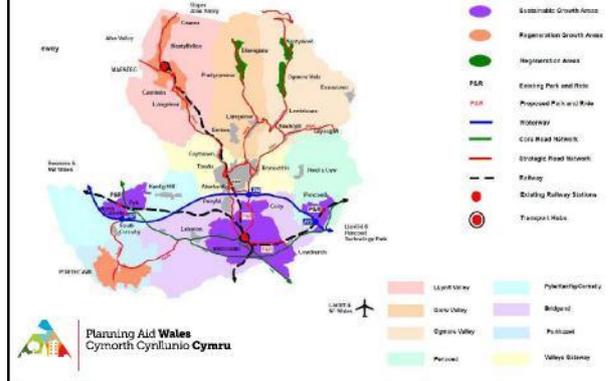
18

PREFERRED STRATEGY

- **Regeneration and Sustainable Growth Strategy**

19

REGENERATION AND SUSTAINABLE GROWTH STRATEGY – STRATEGIC DIAGRAM



22

REGENERATIONS AND SUSTAINABLE GROWTH STRATEGY

- 8333 new homes to deliver a requirement of 7575 dwellings (Balance 2,942 dwellings).
- 71.7 Hectares of employment land to enable 60 ha to be brought forward
- 4995 additional jobs
- Focus on
 - Bridgend Sustainable Growth Area
 - Pen-coed Sustainable Growth Area
 - Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area

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STRATEGIC DIAGRAM SUMMARY

- **Regeneration Growth Areas**
- **Regeneration Areas**
- **Sustainable Growth Areas**

23

REGENERATION AND SUSTAINABLE GROWTH STRATEGY

- **Regeneration Growth Areas** constitute settlements that would benefit from appropriate growth to address a broad range of socio-economic issues within their vicinity, whilst demonstrating capacity to accommodate that growth in a sustainable manner
- **Regeneration Areas** aim to enable development of a scale and nature that is tailored to community needs, whilst diversifying and strengthening local economies, connecting communities to wider opportunities and protecting their high quality environment
- **Sustainable Growth Areas**, which broadly constitute those settlements most conducive to logical expansion through delivery of under-utilised sites within their functional area and/or on their periphery

21

QUESTION 1

The Preferred Strategy makes provision for a level of growth that would enable provision of up to 4,995 jobs, supported by a housing provision for 8,333 new homes to meet a housing requirement of 7,575 dwellings. This is based on the Mid Growth Option from the Strategic Growth Options Background Paper.

Do you have any comments to make on the preferred level of growth?

24

REGENERATION AND SUSTAINABLE GROWTH STRATEGY BY BROAD SETTLEMENT

- **Primary Key Settlement**
Bridgend
- **Main Settlements**
Pencoed
Porthcawl
Pula, Kenfig Hill and North Cornelly (SGA)

25

REGENERATION AND SUSTAINABLE GROWTH STRATEGY BY SITE TYPOLOGY



28

REGENERATION AND SUSTAINABLE GROWTH STRATEGY BY BROAD SETTLEMENT

- **Regeneration Areas**
Ogmore and Garw Valleys
- **The Valleys Gateway**

26

QUESTION 2

The Preferred Strategy is based on Option 4 of the Spatial Strategy Options Document, 'Regeneration and Sustainable Urban Growth'. This represents a hybrid of the other three options to help realise the regeneration aspirations and priorities of the Council while balancing the need to deliver future housing requirements for the County Borough. Development is directed to settlements and parts of the County Borough which will benefit the most and where there are opportunities for securing the greatest positive impacts and benefits of growth.

Do you have any comments to make on the preferred strategy?

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REGENERATION AND SUSTAINABLE GROWTH STRATEGY BY SITE TYPOLOGY

- **Regeneration Sites**
- **Sustainable Urban Extensions**
- **Edge of Settlement**
- **Local Settlement Sites**
- **Affordable Housing Sites**

DESIGN AND SUSTAINABLE PLACEMAKING

- SP2: Design and Sustainable Place Making**
- SP3: Mitigating the effects of climate change**
- SP4: Transport and accessibility**

QUESTION 3

The policies in this section relate to design and sustainable place making.

Do you have any comments to make on the related policies within this section?



31

TO CREATE PRODUCTIVE AND ENTERPRISING PLACES

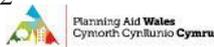
- SP11: Employment Land Strategy
- SP12: Retail and Commercial Centres
- SP13: Decarbonisation and Renewable Energy
- SP14: Safeguarding Mineral Resources
- SP15: Sustainable Waste Management Facilities



34

TO CREATE ACTIVE, HEALTHY, COHESIVE AND SOCIAL COMMUNITIES

- SP6 Sustainable Housing Strategy
- SP7 Gypsy and Travellers
- SP8 Health and Well-being
- SP9 Social and Community Infrastructure



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QUESTION 5

This section of the Preferred Strategy focusses on how the LDP will facilitate economic growth by allocating key strategic employment sites, retaining and safeguarding established employment sites that are viable, and allowing smaller scale developments within local service settlements and rural enterprises. This plethora of employment provision will provide numerous opportunities for investment and enable employers to diversify and grow their own businesses.

Do you have any comments to make on the related policies?



35

QUESTION 4

This section of the Preferred Strategy focusses on meeting housing needs in accordance with the site sequence outlined in Planning Policy Wales, and ensuring that new development is supported by necessary and adequate infrastructure.

Do you have any comments to make on the related policies?



33

QUESTION 6

This section of the Preferred Strategy establishes a retail hierarchy plus boundaries for retail and commercial centres, to ensure they continue to be the principal locations for new retail, office, leisure and community facilities. The aim is to increase social and economic activity having regard to the nature, scale and location of the proposed development in relation to the respective settlement.

Do you have any comments to make on the related policies?



36

QUESTION 7

This section of the Preferred Strategy promotes sustainable development which will contribute to meeting national renewable and low carbon energy and energy efficiency targets, including sustainable development of mineral resources and waste management.

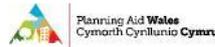
Do you have any comments to make on the related policies?



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CANDIDATE SITES

- What are they?
- Can I comment



40

TO PROTECT AND ENHANCE DISTINCTIVE AND NATURAL PLACES

- SP17: Conservation and Enhancement of the Natural Environment
- SP18: Conservation of the Historic Environment:



38

Discussion !

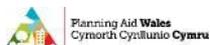


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QUESTION 8

This section of the Preferred Strategy seeks to conserve and enhance the natural and historic environment of the County Borough, recognising that the unique characteristics help attract investment, promote tourism, provide cultural experiences and encourage healthy lifestyles for communities. These goals need to be balanced alongside the need to facilitate sustainable economic growth.

Do you have any comments to make on the related policies?



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Guidance

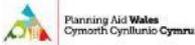
www.placeplans.org.uk



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CONCLUSIONS AND GOING FORWARD

- Outcomes from today
- Not too late
- Comments in writing to Council on the prescribed form.
- LPA Website



CONCLUSIONS AND GOING FORWARD

- Complete the Consultation Form Online at: <http://newldp.bridgend.gov.uk/>
- Email a Copy of the Consultation Form to: developmentplanning@bridgend.gov.uk
- Post a Copy of the Comment Form to: Development Planning, Civic Offices, Angel Street, Bridgend, CF31 4WB
- Telephone the Development Planning Team on 01656 643168 for further information



BCBC CONSULTATION EVENTS

- Portacabin at Jennings Building, Porthcawl 7th October 12pm-6pm, 8th October 10am-1pm
- Pyle Library 14th October 2pm-6pm, 15th October 10am –1pm
- Pencoed Library 21st October 2pm-6pm, 22nd October 10am –1pm
- Maesteg Town Council Meeting Room 28th October 2pm-6pm, 29th October 10am –1pm
- **Bridgend Civic Offices 4th to 8th November 2019, office hours 8.30am – 5pm**



Diolch Thank you

Contact LDP Team
Email: developmentplanning@bridgend.gov.uk

Contact Planning Aid Wales
Email: info@planningaidwales.gov.uk



CONCLUSIONS AND GOING FORWARD

- Comments should be made using the Preferred Strategy Comments Form
- All comments must be received **by 5PM on Friday 8 November 2019**



Appendix 3 to Appendix 1

Mark Jones

From: ldp <ldp@bridgend.gov.uk>
Sent: 03 September 2019, 09:20
To:

Cc:
Subject: Bridgend Replacement LDP - Preferred Strategy Consultation with Planning Aid Wales

Dear Clerk,

Bridgend County Borough Council is working on a replacement Local Development Plan (LDP).

When this new plan is adopted, it will replace the current LDP. It will also become the primary consideration in deciding all planning application in Bridgend.

We will be consulting on our 'Preferred Strategy' for the plan between **30th September and 8th November 2019**.

The Preferred Strategy will set out the main issues for the LDP to address. It will create a vision and look at key locations and levels of growth needed for Bridgend. We are also consulting on the candidate sites which have already been submitted.

We have engaged Planning Aid Wales to run engagement events for all Town and Community Councils in Bridgend before and during the consultation. These events will provide more information on the LDP process, the implications of the Preferred Strategy to your community and how you can comment on the emerging policies and sites.

Planning Aid Wales (PAW) is a registered charity supports community engagement in planning in Wales. They have extensive experience of helping communities understand have their say in the planning system. PAW recognises LDP preparation is an important avenue for securing more effective public involvement in planning.

At the events, Planning Aid Wales will be independent and impartial and will seek to encourage you to put forward your opinions. They will capture this information and report it back to the Council to consider as part of the Preferred Strategy consultation.

There are 5 engagement sessions planned and to focus discussion to particular areas the CTCs have been grouped together. Therefore, the Ynysawdre CC, Garw Valley CC, Ogmere Valley CC, St Brides Minor CC and Coychurch Higher CC event will be

- Monday 30 September 6pm — 9pm Ynysawdre Parish Room, Bryn Road, Ynysawdre, CF32 9LU

However, if you are unable to attend the above event you are welcome any of the other events detailed below.

Invitations are open to any interested member of your council to attend any of the events. Please could you could let us know the names and contact details of any Councillor or Clerk wishing to attend and which session they will be attending by booking online at <https://www.eventbrite.co.uk/e/preferred-strategy-consultation-event-for-bridgend-county-borough-tickets-71253139057>, emailing debgplannin@claidwales.org.uk or alternatively calling 02920 625 **004**.

Monday 23 September	6pm — 9pm	Maesteg Town Hall
Friday 4 October	5.30pm — 8.30pm	Brackla Community Hall
Monday 7 October	1pm — 4pm	Cefn Cribbwr Green Hall
Monday 14 Oct	6pm -9pm	High Tide Inn, Porthcawl

Many thanks

Appendix 4 to Appendix 1

LIST OF CTCS WHO ATTENDED AT LEAST ONE EVENT

- 1 **Maesteg Town TC**
- 2 **Coychurch Higher CC**
- 3 **Garw Valley CC**
- 4 **Cornelly CC**
- 5 **Ogmore Valley CC**
- 6 **Llangynwyd Middle CC**
- 7 **Coity Higher CC**
- 8 **Pyle CC**
- 9 **Porthcawl TC**
- 10 **Merthyr Mawr CC**
- 11 **Newcastle Higher CC**
- 12 **Bridgend TC**
- 13 **Ynysawdre CC**
- 14 **Brackla CC**
- 15 **St Brides Minor CC**
- 16 **Coychurch Lower CC**

Appendix 2 – Youth Council Open Exhibition Day

The Youth Council Open Day took place on the 28th October 2019. The event was held in the Council chamber, based on the theme, *'what will Bridgend look like when you're 50?'*. Members of the Youth Council were invited to participate in the Open Day to discover the role that various Council departments had in relation to the exhibition's theme.

This purposely coincided with the Preferred Strategy Consultation and provided an ideal opportunity to engage with younger members of society in relation to the Replacement LDP. In order to facilitate effective engagement, a large poster was displayed in the chamber to stimulate discussion and interest. The poster included a map of Bridgend County Borough with the preferred spatial strategy overlaid to indicate the potential geographical areas that could accommodate future growth. The poster was supplemented with various images of key thematic areas the replacement plan will cover and seek to address. This included employment, education, renewable energy and active travel.

Utilising the poster as a visual aid, two planning officers provided a brief overview of the Preferred Strategy in terms of its purpose and significance to all participants (15 in total). This prompted a series of questions and views, snowballing into rich discussions. The key points of the discussions were will now be summarised in turn.

One of the key recurring issues raised by participants during the Youth Council Open Day was renewable energy. Specifically, many supported the increased emphasis placed upon the use of renewable energy in order to make a positive contribution to climate change. Various suggestions were made, such as increasing the number of wind turbines, particularly in the Garw Valley, and use of more solar panels on housing as standard. Additionally, participants generally agreed that electric car charging points were a good idea in principle. However, there were widespread reservations regarding use of the technology in the future and whether it would prove to be the appropriate mechanism to reduce private car use. The replacement LDP will seek to ensure that developments, where necessary, will be served by appropriate infrastructure such as electric vehicle charging points. Furthermore, participants stressed that the source of energy supplying the electric charging points should be 100% renewable.

The provision of active travel routes was also considered important amongst participants. All participants felt there was a greater need for additional active travel routes for cycling and walking. Additionally, some dissatisfaction was expressed over existing routes, particularly in terms of connectivity between routes in the County Borough. On this basis, participants emphasised the need to improve connectivity between existing routes in order to encourage less car dependency and greater uptake of active travel opportunities by residents in the

future. There was a general consensus that there are enough Parks and Sports Facilities throughout the County Borough.

Some participants expressed views relating to the revitalisation of town centres, suggesting that the range of uses need to be broadened. There was particular focus on Maesteg in this respect. Some participants stated that a number of shops in Maesteg Town Centre were empty, and that existing uses on the periphery of the town, such as the library and dancehall, should be re-located to the town centre to increase potential footfall. Other participants expressed a need for more soft play facilities and community and youth centres.

Discussions also centred upon Porthcawl and the waterfront. Participants broadly agreed that the regeneration of the waterfront should be prioritised and was very much needed. Many expressed a preference for more restaurants and leisure facilities, including a swimming pool. One particular suggestion emphasised the need for Porthcawl to improve its image as a tourist destination, by increasing the number of tourist facilities and hosting unique events such as a balloon festival, to attract more visitors.

More general comments related to concerns over rising levels of litter in streets and a lack of available bins. Organised beach cleans and litter picking were mentioned as possible methods to combat this problem. Additionally, the need to re-use more plastics (including bags and packaging) was stressed by all.

A further concern related to employment, and officers were asked, “what are you doing to encourage and enable local companies to open premises in Bridgend?”. Participants were informed that the Replacement LDP will safeguard sites that are suitable for all types of employment uses of varying sizes to enable local companies to open premises in Bridgend.

Overall, participants broadly agreed with the level and location of future growth over the 15 year replacement plan period. However, moving forward, participants believe that more thought should be given to ‘planning for tomorrow’, with a need to move away from short termism. All participants advocated greater interaction and engagement with schools and sixth forms for future planning consultations, in combination with officer attendance at future Youth Council meetings. It was widely considered that future development will affect younger age groups significantly and therefore active participation in decision making is key.

Appendix 3 – Bodies Engaged, Preferred Strategy Stage

(Statutory Consultee and Interested Party Database)

Specific Consultation Bodies (including UK Government Departments)

- Welsh Government (including Planning division)
- Natural Resources Wales
- Cwm Taf Morgannwg University Health Board
- British Telecom
- CADW
- Glamorgan Gwent Archaeological Trust
- Telecommunication Operators - O2 Airwave Service, Arqiva, O2 Plc, Three (Hutchinson), T-Mobile, EE, Vodafone, Virgin Media
- Gas and Electricity – Transco, Western Power Distribution, National Grid Wireless, National Grid Company Plc
- Dwr Cymru Welsh Water
- Network Rail
- Secretary of State for Wales
- Department for Business, Energy and Industrial Strategy
- Department for Transport
- Home Office
- Ministry of Defence
- Awen Cultural Trust

Neighbouring Local Authorities

- Neath Port Talbot County Borough Council
- Rhondda Cynon Taff County Borough Council
- Vale of Glamorgan Council

Cardiff Capital Region Joint Cabinet and Other Local Authorities in the Cardiff Capital Region

- Cardiff Capital Region Cabinet
- Newport City Council
- City of Cardiff Council
- Merthyr Tydfil County Borough Council
- Blaenau Gwent County Borough Council
- Torfaen County Borough Council
- Monmouthshire County Council
- Caerphilly County Borough Council

Town and Community Councils in the Bridgend County Area (including neighbouring Town and Community Councils)

- Brackla Community Council
- Bridgend Town Council
- Cefn Cribwr Community Council
- Coity Higher Community Council
- Cornelly Community Council

- Coychurch Higher Community Council
- Coychurch Lower Community Council
- Garw Valley Community Council
- Laleston Community Council
- Llangynwyd Lower Community Council
- Llangynwyd Middle Community Council
- Maesteg Town Council
- Merthyr Mawr Community Council
- Newcastle Higher Community Council
- Ogmore Valley Community Council
- Pencoed Town Council
- Porthcawl Town Council
- Pyle Community Council
- St Brides Minor Community Council
- Ynysawdre Community Council
- Colwinston Community Council
- Ewenny Community Council
- Llangan Community Council
- St Brides Major Community Council
- Llanharan Community Council
- Gilfach Goch Community Council

Other Consultees

- Action on Hearing Loss
- Active Travel Cymru
- AECOM
- Asbri Planning Ltd
- Ashfield Land
- Barratt David Wilson Homes
- Barton Willmore
- Bellway
- Bovis Homes
- BPM Technology Corp LTD
- Bridgend and District YMCA
- Bridgend Association of Voluntary Organisations
- Bridgend Business Forum
- Bridgend Civic Trust
- Bridgend Coalition of Disabled People
- Bridgend College
- Bridgend Community Consortium for Education and Training
- Bridgend County Allotment Association
- Bridgend County Borough Councillors
- Bridgend Designer Outlet
- Bridgend Equality Forum
- Bridgend Public Services Board
- Bridgend Women's Aid
- Bridgend Youth Council & Forum
- British Aggregates Association
- British Astronomical Association (Campaign for Dark Skies)
- British Gas Wales

- British Geological Society
- Business in Focus
- Cardiff International Airport
- CBI
- Celtic Energy
- Cenin
- Chartered Institute of Housing Cymru
- Citizens Advice Bureau
- Civil Aviation Authority
- Coal Authority
- Coastal Housing Group
- Coed Cymru (Welsh Woodland Organisation)
- Coity Walia Commoners Association
- Community Rehabilitation Centre
- Compute (Bridgend) Ltd
- Crown Estates Commissioners
- Dainton Group Services Ltd
- Davies Bros
- Design Commissions for Wales
- Disability Wales
- Edenstone Homes Ltd
- Evan Williams & Sons
- Federation of Master Builders
- Federation of Small Businesses
- Fields in Trust
- Ford Motor Company
- Freight Transport Association
- Glamorgan Muslim Community Association
- Gofal Housing Trust
- Groundwork Bridgend
- Gypsy and Travellers Wales
- Hafod Housing Association
- Hale Homes
- Hanson Aggregates
- Health and Safety Executive
- Hendre Housing Association
- Home Builders Federation
- Jehovah's Witnesses
- Jehu
- John E Jeremy Consultants
- Kier Living
- Lavignac Securities Ltd
- Lichfields
- Linc – Cymru Housing Association
- Llamau Ltd
- Llanmoor Homes
- Llynfi Valley Forum
- Local and Regional Assembly Members with Bridgend County Borough
- Local Members of European Parliament
- Local Members of Parliament
- Lovell
- Mineral Products Association

- National Air Traffic Services Ltd (NSL)
- National Federation of Gypsy Liaison Groups
- Network Rail
- NFU Cymru
- Ogmore Angling Association
- Ogwr DASH
- Pegasus Developments
- Persimmon Homes
- Peter Brett Associates
- Planinfo
- Planning Aid Wales
- Planning Inspectorate Wales
- Play Wales
- Porthcawl Civic Trust Society
- Probation Services
- Public Health Wales
- Redrow Homes
- Religious Society of Friends – Quakers
- Representative Body of the Church in Wales (The)
- Riparian Owners of River Ogmore
- Road Safety Wales
- Royal Institute of Chartered Surveyors Wales
- Royal Mail Property & Facilities Solutions
- Royal National Institute for the Blind
- Royal Society of Architects in Wales
- RSPB Cymru
- RTPI Wales
- Shelter Cymru
- Showmen’s Guild of Great Britain South Wales and Northern Ireland
- South Wales Fire and Rescue Service
- South Wales Land Development Ltd
- South Wales Police
- South Wales Police and Crime Commissioner’s Office
- Sports Wales
- Sustrans Cymru
- Tarmac
- Taylor Wimpey
- TENSI Properties Ltd
- The Equality & Human Rights Commission
- The Ladbroke Trust
- The National Federation of Gypsy Liaison Groups
- The Ramblers Association
- The Wallich
- The Wildlife Trust of South & West wales
- Thrive Assets
- Transport for Wales
- Trustees of Merthyr Mawr Estates
- Tythegston Green Ventures Ltd
- Tythegston Millennium Trust
- United Welsh Housing Association
- Wales and West Housing Association
- Valleys to Coast Housing

- Welsh Ambulance Service
- Welsh Health Estates
- Welsh Local Government Association
- Yellow Wales

- **Chambers of Trade:-**

- CF31 Bid
- Maesteg Chamber of Trade
- Porthcawl Chamber of Trade

- **Local Transport Operators: -**

- Arriva Trains Wales
- First Cymru
- Great Western Trains Company Ltd