

Appendix 2: Preliminary Questions

All elements of the LDP must be based on robust, credible and proportionate evidence. It will be helpful if the answers to the following questions include signposts to the relevant parts of the evidence base and any other assessments relied upon.

- 1 **Has the Development Plan (DP) been prepared in accordance with the requirements of:**

a) The approved Delivery Agreement, including the Community Involvement Scheme?

Formal Council resolution to submit the LDP for examination was originally due to be sought on 14th September 2022 in accordance with the DA. However, due to the death of Her Majesty Queen Elizabeth II, all Council meetings for the two weeks commencing 12th September 2022 were postponed. This necessitated formal resolution being sought on 19th October 2022 instead, which took the LDP beyond the agreed 3-month slippage period set out in the 2nd Delivery Agreement (DA) Revision, agreed on 10th December 2021. Nevertheless, on 14th September 2022, Welsh Government's Chief Planner stated, "I wish to confirm that submission of the plan following formal resolution from Council at the 19 October meeting will not be in conflict with the 2nd revised DA. This position reflects the national significance of recent events, and there being no adverse effect on stakeholders". This letter has been made publicly available in accordance with the requirements set out in Regulation 10, accompanying the 2nd revised DA.

The Plan has otherwise been prepared in accordance with the DA, and the Council has undertaken consultation in accordance with the CIS at each appropriate stage of Plan preparation. Further details can be found in the Initial Consultation Report and Deposit Consultation Report.

b) The Well-being of Future Generations Act (Wales) (2015)? And

Yes, the Replacement LDP has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the SA process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies. The Replacement LDP's objectives link into the Well-being Goals, and each strategic policy sets out which of the Well-being Goals it meets. Background Paper 9 assesses each policy in respect of its compatibility with the Local Well-being Goals. The SA (and SEA) demonstrate that the LDP has a significant positive impact on sustainable development.

c) The Equality Act (2010)?

An Equality Impact Assessment has been undertaken, which has considered the potential impacts of the Replacement LDP upon people with

protected characteristics (negative or positive). This document is a multi-purpose tool, which includes examples of how the policies and proposals help to promote equality. The appropriate steps have therefore been taken to comply with the Public Sector Equality Duty Equality Impact Assessment legislation. The Assessment helps demonstrate that the Council has shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the Socio-economic Duty. It also ensures consideration of the Welsh Language Standards.

Equality and Social Inclusion is also a key SA Objective. The SA has identified no gaps in policy coverage in reducing poverty and inequality, tackling social exclusion and promoting community cohesion, including through enhancing access to community facilities. The following proposed strategic policies are predicted to have Major Positive (i.e. significant beneficial) effects on aspects of this SA Objective:

- SP6 – Sustainable Housing Strategy;
- SP7 - Gypsy, Traveller and Showpeople Sites;
- SP8 - Health and Well-being; and,
- SP9 - Social and Community Infrastructure.

2 Has the DP been subject to a robust Sustainability Appraisal/Strategic Environmental Assessment? Have all of the ‘likely significant environmental effects’ of the Plan and all ‘reasonable alternatives’ been identified, described and evaluated?

The Replacement LDP’s accompanying SA Report (incorporating SEA) assesses the likely sustainability and significant environmental effects of all substantive components within the Plan (strategy, policies, site allocations, etc.) and identified reasonable alternatives. This builds directly upon previous SA reporting including an SA Scoping Report (2018) and an Interim SA Scoping Report (2019) which accompanied the Replacement LDP Preferred Strategy. The SA Report demonstrates how the SA, incorporating SEA, process has informed the development of the Replacement LDP, including the incorporation of recommended changes. As a result, the SA Report concludes that there is good coverage of all key sustainability issues in the Plan, with plan components performing well against the SA Framework. It also identifies strong compatibility between the LDP Vision/Objectives and the SA Framework, plus no likely significant adverse effects (taking account of mitigation in all its forms).

3 Has the DP been subject to a robust Habitats Regulations Assessment? Where ‘likely significant environmental effects’ have been identified, has an adequate Appropriate Assessment (AA) been undertaken?

All substantive components of the Deposit Plan, and thus the emerging Replacement LDP, have been subject to HRA in accordance with statutory requirements. The HRA

(2021) was published to accompany the Deposit Plan, building on previous stages of HRA. This documented the findings of an Appropriate Assessment carried out to identify any likely significant effects on the integrity of European Sites in the context of their conservation objectives. The HRA concluded that the Replacement LDP is not likely to have significant effects on any of the identified European sites, either alone or in combination with other plans or projects. The policies, proposals and measures incorporated into the LDP are considered appropriate to sufficiently protect European sites from development contained within the Plan and provide improvements in air quality.

4 Have there been any significant changes in national policy or local circumstances since the DP was placed on deposit? If there have, what are the implications of these changes for the Plan? Do they need to be addressed through the preparation of new evidence and/or revisions to the Plan? What is the intended timescale for this work?

There have not been many significant changes in national policy or local circumstances since the LDP was placed on Deposit. The main change is in relation to TAN15. The forthcoming revised TAN15 is based on a Flood Map for Planning that includes projections showing future flood risk areas because of climate change. The inclusion of such projections has caused some significant increases in the extent of the highest risk flood zones. Three allocations (proposed at Deposit Stage) were affected.

Firstly, the revised modelling for Parc Afon Ewenni, Bridgend has demonstrated that the site is no longer deliverable for residential uses, and the housing allocation has therefore been removed from the Replacement LDP.

Secondly, the initial modelling showed that Land East of Pencoed was affected. However, detailed modelling was submitted to Natural Resources Wales (NRW) and the Flood Map for Planning has since been updated. There are no barriers to the allocation being retained in this respect.

Thirdly, the Porthcawl Waterfront Allocation is affected, which prompted ongoing dialogue with NRW. However, most of Porthcawl and Newton are protected by existing coastal flood defences that protect existing property against a 1in200year tidal event, in the present day. This is not currently (July 2022) recognised in the Flood Map for Planning as not all local authority flood defence assets were picked in the first iteration. As a result, the Council submitted a flood map challenge to NRW to attribute a TAN15 Defended Zone to most of Porthcawl and Newton. This challenge was approved and the new Defended Zone will be included in the November 2022 update of the Flood Map for Planning. As such, this is recognised in the Strategic Flood Consequences Assessment (SFCA) update (2022) prepared to support the Replacement LDP. In addition, the SFCA considers the Porthcawl Flood Defences Scheme will ensure the Porthcawl Waterfront Regeneration site can be developed in compliance with the requirements of the future revised TAN15. As such, it is considered appropriate to

reallocate this site, with detailed consideration of flood consequences influencing scheme design at planning application stage. A Statement of Common Ground between the Council and NRW has been prepared to document this outcome, which forms part of the Replacement LDP's evidence base.

Moreover, the Replacement LDP has been designed to provide a flexible policy framework which can deal with unexpected and unforeseen changes in circumstances such as the Covid-19 pandemic. Refer to Background Paper 11 – Covid-19 Policy Review.

5 Is the DP strategy consistent/compatible/in conformity with:

a) National policy, guidance and Future Wales: the national plan 2040?

Yes, the Replacement LDP is considered to be in general conformity with Future (NDF), as detailed within Background Paper 17: Conformity with Future Wales 2040 (NDF). As part of their representation on the Deposit Plan, Welsh Government confirmed that, in their opinion, "Bridgend's Replacement Local Development Plan (2018-2033) is in general conformity with the National Development Framework (NDF): Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Mana Manual (Edition 3)".

b) The Well-being Goals?

Yes, the Replacement LDP has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the SA process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies. The Replacement LDP's objectives link into the Well-being Goals, and each strategic policy sets out which of the Well-being Goals it meets. Background Paper 9 assesses each policy in respect of its compatibility with the Local Well-being Goals. The SA (and SEA) demonstrate that the LDP has a significant positive impact on sustainable development.

c) The Welsh National Marine Plan?

Yes, the Replacement LDP has regard to and the WNMP. SP4 (in recognising the fundamental challenges posed by climate change) complements the Marine Plan on matters including flood risk and the LDP has sought to direct development away from areas of unmitigated flood risk. Equally, Policies DNP5-DNP9 respond to issues such as adaptability, green infrastructure and connectivity and the LDP strongly protects open countryside from inappropriate development. The strategic policies, combined with subsequent detailed policies will ensure that the LDP complements the WNMP.

d) The relevant Area Statement?

Yes: in the context set out by the Environment Act, Natural Resources Wales (NRW) have published Area Statements, which increase the understanding of the considerations around the natural resources in an area, the pressures on them and the benefits they provide. They provide information required to better manage natural resources, which has been duly considered by the LPA and the Replacement LDP has been prepared in the light of consultation with NRW. In their Deposit Consultation Representation, NRW acknowledged that the LPA has taken on board advice from previous correspondence, “which has enabled positive provisions in the Deposit Plan both in policy terms and with regard to allocation of sites”. This period of consultation provided NRW the opportunity to identify any incompatibilities with the Area Statements. No incompatibilities were identified in this respect and NRW confirmed, “we support the intent of the plan’s policies and proposals to enable the delivery of sustainable development and ensure social, economic, environmental and cultural well-being goals are all suitably balanced in the decision-making process, so the right development occurs in the right place”.

e) If an LDP, the relevant strategic development plan (when adopted)?

There is currently no SDP within the South East Wales region. CJsCs will undertake strategic development and regional transport planning in the future, including preparing SDPs. Although Bridgend County Borough Council is proceeding with a Replacement LDP, simultaneous collaborative working will be undertaken with neighbouring authorities and the broader region to prepare an SDP. A joint evidence base will also be shared wherever possible to this end.

f) Regional plans/strategies and the programmes of utility providers?

Yes, the Replacement LDP was prepared within the context of the relevant regional plans, strategies and utility programmes. These were also considered when preparing the LDP strategic policies, the growth strategy, strategic objectives, spatial strategy and settlement hierarchy. The Replacement LDP, associated evidence base and background papers set out how regional plans, strategies and utility programmes have been considered. Proactive engagement has been key to this exercise and the LPA has consulted with a range infrastructure and utility providers throughout plan preparation as detailed in the Infrastructure Delivery Plan.

g) The plans/strategies of neighbouring local planning authorities? And

Yes, the Replacement LDP has been prepared following close dialogue with all neighbouring LPAs (Vale of Glamorgan, Neath Port Talbot and Rhondda Cynon Taf County Borough Councils) as well as other essential organisations. This dialogue has been conducted both on an individual and topic basis, but also through the South East Wales Strategic Planning Group and other topic-based forums. The Replacement LDP’s Spatial

Context Chapter references the adopted Plans of the neighbouring LPAs, which have all been considered throughout LDP preparation to ensure compatibility. Statements of Common Ground have been signed in this respect.

h) The relevant Well-being Plan or National Park Management Plan?

Yes, the Replacement LDP has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the SA process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies. The Replacement LDP's objectives link into the Well-being Goals, and each strategic policy sets out which of the Well-being Goals it meets. Background Paper 9 assess each policy in respect of its compatibility with the Local Well-being Goals.

6 Has the LPA exhausted all opportunities for joint working and collaboration on both the preparation of the DP and its evidence base?

Yes, at the start of the Replacement Local Development Plan process, Rhondda Cynon Taf and Caerphilly LPAs were not progressing with LDP reviews (although this position has now changed) and therefore review timescales did not align. In addition, Vale of Glamorgan and Neath Port Talbot LPAs were not at their review stages, which meant there were no opportunities to commission shared evidence base studies. However, Bridgend has utilised the evidence base methodologies prepared by SEWSPG in the formulation of its evidence base, where possible, to ensure consistency with other future LDPs and Plans. This has been shared with the South East Wales Strategic Planning Group and other topic-based forums.

7 What is the DP's spatial strategy? How do the key components of the strategy interact? Does it represent an appropriate approach for delivering, managing and distributing growth over the Plan period?

SP1 sets out a clear spatial strategy to help realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033. SP1 apportions sustainable growth towards settlements that already benefit from significant services, facilities and employment opportunities and are most conducive to enabling transit orientated development; Sustainable Growth Areas. These include the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly. This Strategy seeks to ensure new development can come forward with necessary infrastructure improvements, including transport networks, utilities, green infrastructure, health, education, affordable housing and social facilities.

The Strategy also includes several regeneration sites, which represent a necessary degree of continuity with the first adopted LDP and are essential to implement the

long-term regeneration strategy embodied within the Replacement LDP Vision. Regeneration Sites will be allocated in parts of the County Borough that will benefit the most from regeneration-led growth; where significant opportunities exist to address contamination, constraints and/or industrial legacies whilst encouraging economic growth.

The Spatial Strategy was informed by a range of key pieces of evidence including the Settlement Assessment, Plan-Wide Viability Assessment and LHMA. On this basis, the Replacement LDP was prepared to maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites and seek to minimise pressure on Best and Most Versatile (BMV) agricultural land.

Refer also to Background Papers 3 (Spatial Strategy Options) and 15 (The Best and Most Versatile Agricultural Land).

8 How was the DP's settlement hierarchy defined? Is the methodology used to define the hierarchy clear and rational?

The Replacement LDP identifies and differentiates between the sustainability of places by defining a settlement hierarchy. This is informed by the conclusions of the Bridgend County Borough Settlement Assessment (2019, updated in 2021), which reflects Bridgend's historical and functional settlement pattern and seeks to achieve more sustainable places in a number of ways.

At Preferred Strategy Stage, Welsh Government commented, "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 WG is broadly supportive of this approach**" (original emphasis).

The scale and type of growth apportioned to settlements is dependent upon their individual roles, functions and positions within the Settlement Hierarchy. This is to ensure the Replacement LDP directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided. The methodology is clear and rational, derived from a regional approach.

9 What is the rationale for the distribution of new development? Is the approach consistent with the National Sustainable Placemaking Outcomes?

The Vision of the Replacement LDP seeks to continue to transform the County Borough, 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. There is clear emphasis on achieving sustainable patterns of growth

that support existing local services and facilitates in addition to enabling sustainable regeneration within Porthcawl and the Valleys Settlements.

As outlined in the Spatial Strategy Options Background Paper, the Preferred Spatial Strategy is considered the best option to align with this Vision and also the Key Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP is seeking to address. The Spatial Strategy is considered most conducive to accommodating the Growth Strategy and delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales' placemaking principles. It will maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites in accordance with the site search sequence and seek to minimise pressure on BMV agricultural land.

The distribution of new development is designed to accord with the Bridgend Replacement LDP with the Bridgend Local Wellbeing Plan, the Well-being of Future Generations (Wales) Act 2015, the Welsh Government's National Sustainable Placemaking Outcomes and thematic priorities within 'Future Wales' (NDF) and Planning Policy Wales (PPW). In consequence, the Replacement LDP is based around using placemaking to achieve economic and spatial outcomes in tandem. Background Paper 23 has demonstrated that the Replacement LDP is in general conformity and supports delivery of the National Sustainable Placemaking Outcomes, providing a sound framework for placemaking-led sustainable development in the County Borough.

- 10 **What was the methodology underlying the site selection process? Are the resultant allocated sites:**
- a) In sustainable locations and generally free from physical constraints, such as land ownership, infrastructure, access, ground conditions, flood risk issues, pollution, landscape, biodiversity and heritage designations? and**
 - b) Attractive to the market (both private and/or public sector) for development, able to accommodate the policy and infrastructure requirements set out in the Plan, viable, and deliverable during the Plan period?**

A Candidate Site Assessment (CSA) has been undertaken to underly the site selection process. This was undertaken in tandem with the SA, incorporating SEA, which has assessed the likely sustainability and significant environmental effects of all substantive components of the Plan (strategy, policies, site allocations, etc.) and any identified reasonable alternatives.

Stage 1 of the CSA process incorporated sustainability criteria into the site assessment process, based on the 14 objectives developed for the SA. The SA (incorporating the SEA) provides an evaluation / validation of the site selection process in respect of the overall contribution (or otherwise) to sustainable

development. Following a base level assessment of all Candidate Sites, the SA excluded some sites for consideration based on significant environmental or deliverability criteria e.g., flood risk or common land. Stage 1 specifically addressed sites identified with major constraints that have been excluded from further consideration. This provided an opportunity for site promoters to provide further information to demonstrate that identified constraints could be satisfactorily overcome before any decision was made at Deposit Stage as to which Candidate Sites should be allocated.

Stage 2 of the CSA involved scrutinising the sites that progressed from Stage 1 in greater detail. During Stage 2, sites were examined based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints, and opportunities. In addition, there was an assessment of the policy context, together with the local geographical context, including known infrastructure issues. Following completion of Stage 2, the Council obtained the views of a limited number of specific consultation bodies in respect of those sites considered suitable for future development and possible allocation in the RLDP. As a result of this assessment, a range of sites were identified for inclusion within the RLDP (Stage 4), acknowledging the conclusions drawn from Stage 2 and comments received from Stage 3.

The proposed allocations have been subject to rigorous viability and deliverability testing in collaboration with specific site promoters. This process has certified that the costs of the development requirements and placemaking principles set out in site specific policies coupled with the Council's aspirations for delivering high-quality new communities are realistic and deliverable on each site within the plan period. The sites are considered attractive to the market and deliverable during the plan period (refer to Background Paper 4: Housing Trajectory).

11 **Will the DP be supported by supplementary planning guidance? If so, what subjects will be addressed? What are the timescales for the adoption of the guidance? How will it assist in the delivery of the Plan?**

The Replacement LDP will be supported by Supplementary Planning Guidance (SPG). Two SPGs have been published during Replacement LDP preparation (Education Facilities and Residential Development and Outdoor Recreation Facilities and New Housing Development) and will be updated as necessary post adoption of the Replacement LDP. These will be supplemented by additional SPGs, which will be prepared within the first two years of LDP adoption, to cover the following thematic policy areas:

- **Affordable Housing** - to expand upon the Council's planning policy on affordable housing and outline how the Council will expect affordable housing to be delivered as part of new residential developments within the County Borough. It will also further clarify the approach to providing affordable housing on exception sites in limited circumstances.

- **Biodiversity and New Development** – to clarify how development should minimise impacts on biodiversity and provide biodiversity enhancement (net benefit), where possible, whilst protecting or enhancing green infrastructure provision in recognition of its wide-ranging benefits.
- **Design Guide** – to provide a clear statement of what the local planning authority expects within the County Borough, both in terms of how design information should be presented, but also how design issues should be addressed to enhance clarity at the planning application stage.
- **Design of New Schools** – to provide additional guidance in relation to the development of new school sites, considering connectivity, adjoining land uses and active travel opportunities, thereby enabling delivery of the School Modernisation Programme (Band C).
- **Development in the Countryside** – to clarify the types and scale of development that will be considered acceptable in countryside locations.
- **Employment Land** – to expand upon the Council’s planning policy, which deals with the protection of identified employment sites for their employment function and circumstances where alternative uses may be acceptable.
- **Flood Risk** – to provide additional guidance into how certain sites can be developed in compliance with the requirements of the future revised TAN15.
- **Green Infrastructure** – to support the delivery of, safeguard and enhance biodiversity and integrated multi-functional green infrastructure networks.
- **Health and Wellbeing** – to ensure planning decisions contribute to the national and local Well-being Goals set out in the Well-being of Future Generations (Wales) Act 2015. This SPG will offer guidance for addressing the effect of the built and natural environment on health and well-being as part of a strategic approach to tackling local health inequalities and promoting healthy lifestyle options. It will also provide guidance on appropriate locations for primary health care facilities.
- **Masterplans for Long Term Regeneration Sites** - to provide detailed strategies to enable the delivery of Long-Term Regeneration Sites within the Plan (Coegnant Reclamation Site (COM1 (R1)), the Former Cooper Standard Site, Ewenny Road (COM1 (R2)) and Maesteg Washery (COM1 (R3))).
- **Parking Standards** - to expand upon the Council’s requirements in relation to parking provision for all forms of development balanced against the availability of active travel opportunities and community facilities. It will also assist in the preparation and submission of planning applications and achieve a common approach to the provision of parking facilities associated with new development and change of use.
- **Planning Obligations** – to set out the Council’s approach to planning obligations when considering applications, providing further guidance on how the policies set out in the LDP are to be implemented. This SPG will help to ensure that developments contribute toward the provision of necessary infrastructure and measures required to mitigate their impact.
- **Renewable Energy and Decarbonisation** – to provide advice and further guidance to help ensure that new development is designed to be resilient to

future climate change effects, by encouraging use of renewable and low/zero carbon energy generation technology.

- **Southern Bridgend Gateway** – to enable further consolidation and enhancement of Bridgend’s role as a major focus for employment and new inward investment by promoting strategic employment sites at Brocastle Estate, the former Ford Site and Parc Afon Ewenni. The SPG will clarify the role and land uses that can be enabled at these sites to allow for sustainable, placemaking-led developmental synergy.
- **Sustainable Construction and Design** – to provide advice and further guidance to help ensure that new development is designed to be resilient to future climate change effects, having regard to broader principles of sustainable design in order to significantly reduce energy usage and carbon emissions.
- **Trees and Development** – to clarify the Council’s expectations regarding tree planting and new development, to offer advice on maintaining existing trees and planting new trees, on and adjacent to development sites.

12 **What is the DP’s strategy for the provision of housing? Is it appropriate to meet the needs of the area over the Plan period?**

SP1 sets out a clear spatial strategy to help realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033. The Strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on BMV agricultural land. However, given the existing LDP’s success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough’s future housing requirements can be realised.

Therefore, SP1 also apports sustainable growth towards settlements that already benefit from significant services, facilities and employment opportunities and are most conducive to enabling transit orientated development; Sustainable Growth Areas. These include the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly. This Strategy seeks to ensure new development can come forward with necessary infrastructure improvements, including transport networks, utilities, green infrastructure, health, education, affordable housing and social facilities.

The scale and location of growth identified by SP1 has been influenced by the findings of the LHMA and Plan-Wide Viability Assessment. The LHMA revealed significant shortfalls of affordable housing provision within Bridgend, Porthcawl, Pencoed, and Pyle, Kenfig Hill and North Cornelly. Moderate housing need was also identified in Maesteg and the Llynfi Valley, as was the need to diversify the dwelling stock within Valleys Settlements. This Strategy provides the optimal means to address these shortfalls in affordable housing provision, whilst helping to counter-balance the mismatch between supply and demand. Indeed, the Plan-Wide Viability Assessment and site-specific viability testing demonstrated that sites within these areas could support significant nil-grant affordable housing contributions (refer to COM2). The Strategy is therefore considered most appropriate to maximise delivery of affordable housing in high-need areas as identified by the LHMA, whilst enabling sustainable forms of development that meet the LDP Objectives, minimise pressure on BMV agricultural land and provide scope to address existing infrastructure capacity issues. The Spatial Strategy Options Background Paper justifies this Strategy through evaluating a range of spatial options, each of which have also been considered as a reasonable alternative and assessed further under the SA process.

13 What is the LDP's housing requirement figure (HRF)? How has it been calculated?

The LDP's housing requirement is 7,575 dwellings during the 15-year LDP period from 2018 to 2033. This is based on a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the Cardiff Capital Region and Swansea Bay Region. The proposed housing requirement is derived from a POPGROUP Scenario that Uses an ONS 2019 Mid-Year Estimate base year and calibrates its migration assumptions from a 6-year historical period (2013/14–2018/19). This scenario reflects a positive socio-economic period post the Great Recession, yet pre the pandemic. This period witnessed sustainable population growth, in part linked to the number of dwelling completions across the County Borough, which the Replacement LDP seeks to continue.

Maintaining this trajectory will lead to more established households (particularly around the 35-44 age group) both remaining within and moving into the County Borough, coupled with less outward migration across other economically active age groups. This will encourage a more youthful, skilled population base to counter-balance the ageing population, resulting in an overall population increase of 9.4% or 13,681 people over the plan period. This level of growth will also enable delivery of 1,595 affordable homes, thereby maximising delivery in combination with other sources of affordable housing supply in the context of plan-wide viability. This Growth Strategy is deemed the most appropriate, sustainable means to deliver the LDP Vision and Objectives as justified within the Strategic Growth Options Background Paper. All reasonable alternatives have also been duly assessed under the SA process.

At Deposit Consultation Stage, Welsh Government commented, “the level of household growth proposed in the deposit LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over the 2018 principal projections. This degree of aspiration aligns with Bridgend being within a national growth area. This is supported by 71.9ha of employment, looking to deliver 7,500 jobs, thereby retaining the younger cohort of employees. Collectively, these approaches support Bridgend as having a key role in the national growth area, aligning with the NDF”. Equally, there was broad support from the development industry for the housing requirement as a minimum figure as Deposit Consultation Stage.

- 14 **In defining the HRF, was adequate regard paid to the latest household and population projections? Was consideration given to the main local influences on housing demand in the area (including household formation rates, migration levels, and household conversion ratios etc)?**

Yes, the latest household and population projections were analysed in combination with more recent data from Mid-Year Estimates and a broad range of historical demographic scenarios, with varying migration assumptions. The refreshed suite of projected scenarios included the 2014-based principal projection, the variants that make up the 2018-based WG projections, POPGROUП trend scenarios (incorporating a 2019 base year) and dwelling-led scenarios. Variants on the PG-Short Term scenario were also evaluated, considering growth outcomes underpinned by higher fertility and mortality assumptions. Under each scenario, household growth has been estimated using household membership rate assumptions from the WG’s 2018-based household projection model, in combination with a dwelling vacancy rate of 4.8% for Bridgend. This vacancy rate was derived from 2011 Census statistics and is consistent with the previous range of scenarios used to inform the Preferred Strategy. All ten scenarios are defined in more detail within the LDP Demographics Update (2020).

Each option was evaluated to determine how far it correlates with the evidence base, how far it will deliver the key issues the plan is seeking to address and whether it would achieve alignment between housing and economic growth in a manner that minimises the need for unsustainable travel patterns. Refer to Background Paper 2: Strategic Growth Options.

- 15 **Were alternative housing growth scenarios considered? If so, what alternative scenarios were they, why were they discounted, and why was the preferred option selected?**

At Preferred Strategy Stage, a range of 2014-based scenarios and alternatives were initially analysed to inform three growth options (Low, Mid and High). These options were selected on the basis of being representative of identified scenarios, reasonable in relation to the evidence base and sufficiently diverse to enable different strategic planning responses. WG then published 2018-based population and household projections in 2020, updating the 2014-based equivalents. These new WG projections

provided a refreshed baseline for the Replacement LDP's demographic evidence base, and were considered alongside a range of growth scenarios, including trend and housing-led alternatives. The Strategic Growth Options Background evaluated and drew conclusions from these revised growth scenarios, concluding that the justified growth option (Mid Growth) used to underpin the Preferred Strategy remained appropriate to deliver the overall LDP Vision and Objectives when balanced against a range of key supply factors.

After detailed evaluation, the preferred option was justified as the most appropriate to achieve a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the region. It is considered likely to perform best by supporting economic growth, enabling the delivery of key infrastructure, securing affordable housing and improving connectivity without resulting in over-development. The analysis also demonstrated that the preferred option is realistic and deliverable when benchmarked against past delivery rates, whilst also being robustly grounded in post-recession demographic and migration trends. This option is considered most appropriate to deliver against the full range of issues the Replacement LDP is seeking to address, enable a balanced level of housing and employment provision that will achieve sustainable patterns of growth, support existing settlements and maximise viable affordable housing delivery. The alternative housing growth scenarios did not align as closely with the Plan's Aims and Objectives and failed to achieve an equilibrium between economic growth, housing development and jobs. Refer to Background Paper 2: Strategic Growth Options.

16 What is the DP's housing land supply figure and how has it been calculated?

The housing trajectory demonstrates that the housing requirement of 7,575 dwellings is comfortably deliverable during the 15-year LDP period from 2018 to 2033. This incorporates an appropriate level of flexibility to ensure delivery of the Anticipated Annual Build Rate (AABR) throughout the plan period. The flexibility allowance (10%) has been included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered. Refer to Background Paper 4: Housing Trajectory.

17 Is the housing trajectory set out in the DP realistic?

Yes, the total housing provision, and spatial distribution thereof, has been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at several Stakeholder Group Meetings. At the latest Stakeholder Group meeting (27/05/2022), no objections were raised regarding the completion figures, anticipated annual delivery rates for sites with planning permission and the anticipated

annual delivery rates for the proposed housing allocations. As such, there are no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period, all of which have been approved by the Stakeholder Group. Refer to Background Paper 4: Housing Trajectory.

18 What is the DP’s strategy for the provision of affordable housing? Has it been informed by a reliable and up-to-date market assessment (LHMA)? What scale, tenure and type of housing need was identified and how will this need be met over the Plan period?

The Council has prepared an updated LHMA (2021) for the County Borough. This was prepared in accordance with the (then) latest Welsh Government Guidance (2006 and 2014), following direction from Welsh Government in March 2021. New LHMA guidance was published on 31st March 2022 and has replaced the previous methodology (detailed in the 2006 and 2014 guidance). However, Welsh Government wrote to all Local Authorities on 24th March 2022 to confirm, “all LDPs should be based on the outputs of the new methodology. The only exception is where a plan has passed the Deposit Stage of plan preparation”, which was the case in Bridgend County Borough.

The 2021 LHMA identified an annual need for 451 affordable dwellings during the conventional five-year assessment period (62% social rent and 38% intermediate), based on the assumption that the existing backlog will be cleared during these five years. A further annual need of 288 affordable dwellings has also been identified over the remaining 10 years of the LDP period (50% social rent and 50% intermediate), stemming from newly arising need from newly forming households plus existing households falling into need. The total need for affordable housing extrapolated over the whole Replacement LDP period (2018-2033) is 5,134 affordable housing units, comprising 2,839 social rented dwellings and 2,295 intermediate dwellings. This has informed Replacement LDP development to ensure the Plan will provide an appropriate contribution to affordable housing provision, through viable thresholds and proportions.

While additional affordable housing is needed throughout the County Borough, this varies by Housing Market Area in terms of quantity and type, with Bridgend having been identified as the highest housing need area. This evidence, combined with the Settlement Assessment and Spatial Strategy Options Background Paper, informed the classification of Bridgend as the Primary Key Settlement within the Settlement Hierarchy and the primary focus for sustainable growth. Equally, the LHMA identified high need within and informed classification of the other Main Settlements in the Strategy (including Pencoed, Porthcawl and the grouped settlement of Pyle, Kenfig Hill and North Cornelly), along with moderate need in Maesteg. The Spatial Strategy has therefore been developed to maximise affordable housing delivery in high housing need areas.

However, it must be recognised the need identified in the LHMA represents the scale of the affordability gap in the market and the LDP itself is not the only affordable housing delivery mechanism to help address it. The Plan-Wide Viability Assessment (2021) was therefore prepared to determine the extent to which the LDP can contribute to the need identified for affordable housing across the County Borough over the plan period. The Assessment considered the broad levels of development viability across the County Borough's seven Housing Market Areas as identified within the LHMA and was supplemented with site-specific viability testing for those sites key to delivery of the Plan. This process informed the contribution that sites (within different market areas) can make to the delivery of infrastructure, affordable housing and other policy requirements. These requirements are reflected in Development Management Policy COM3. Refer also to Background Paper 5: Affordable Housing.

19 **What is the DP's affordable housing target? How was it calculated? Does it maximise the opportunities for delivery?**

During the plan period, development proposals within the LDP are expected to deliver a total of 1,595 affordable dwellings across the County Borough to contribute to the level of housing need identified by the LHMA. This overall affordable housing target has been derived by applying the site-specific contributions within COM1 and the percentage targets within COM3 to the individual components of housing supply. Therefore, the overall affordable housing target only relates to sources of supply that are funded and delivered through the planning system. The thresholds for and percentages of affordable housing provision have been set with regard to the housing need identified within the LHMA, the Plan-Wide Viability Assessment and site-specific viability testing. Refer also to Background Paper 5: Affordable Housing.

20 **Will the DP's affordable housing target meet the need for social rented and intermediate accommodation identified in the LHMA? If not, how will this need be met over the Plan period?**

The LDP's affordable housing target will meet over 30% of the affordable housing need identified in the LHMA. As confirmed in National Guidance, it must be recognised that the need identified in the LHMA represents the scale of the affordability gap in the market and the LDP itself is not the only affordable housing delivery mechanism to help address it.

The Plan's contribution will form part of several streams of affordable housing supply to meet this identified need, including Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.

21 How have the DP's site-specific affordable housing target(s) been defined? In which geographical locations will the target(s) apply?

COM3 details area-wide and site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment and essentially apply to windfall sites of ten units or more. The latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council's aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3. Refer also to Background Paper 5: Affordable Housing.

22 How were the affordable housing site thresholds defined? Have they been informed by robust, proportionate and credible evidence?

The affordable housing policies are applicable to sites of ten units or more. This threshold was established by the Plan-Wide Viability Assessment. Potential for an affordable housing policy was considered for sites smaller than 10 dwellings, although application of a broad percentage to sites of this scale does increasingly result in 'partial unit' contributions and presents bespoke viability issues, particularly where rounding up to one dwelling can impact upon a small scheme coming forward. This factor combined with more widely varying build costs, bespoke property types, atypical sale values and alternative land value aspirations all render application of a generic affordable housing policy less appropriate for sites below 10 units.

23 How will off-site contributions be used to deliver affordable housing?

Affordable housing will be expected to be delivered on-site in the first instance and off-site provision and/or financial contributions will only be accepted in lieu of on-site provision in exceptional circumstances and in accordance with COM3 and COM4.

Off-site-contributions will be used to deliver affordable housing in the manner specified within the existing adopted Affordable Housing SPG:

A sequential approach to the location of off-site provision will be appropriate with the preference being for the provision of affordable housing within the same settlement. If this is not achievable then provision should be made within the same sub-market and then, only if no other options are available, provision may be acceptable elsewhere in the County Borough where there is evidence of need.

Financial contributions will be used to support overall affordable housing provision within the County Borough to be delivered in partnership with RSLs. Contributions will be used to provide either part or full funding for schemes, projects and initiatives which may include:

- The purchase and refurbishment of long-term empty properties by an RSL for reuse as affordable housing
- Purchase of land for affordable housing
- Delivery of Mortgage Rescue
- Development of supported temporary and move-on accommodation
- Supplementing on site affordable housing provision on other developments in the local area
- Any other scheme identified by the Council that will increase the supply of affordable housing in the County Borough.

24 **What is the DP's strategy for the provision of Gypsy and Traveller accommodation? Has it been informed by a Gypsy and Travellers Accommodation Assessment (GTAA)? Does the GTAA identify a need for new pitches (permanent and transit) over the Plan period? How will the need be met?**

A refreshed GTAA was completed in 2020 to replace the outcomes of the previous GTAA for Bridgend County Borough that was published in 2016.

The refreshed GTAA calculated a County Borough need of 5 pitches for the first 5 years of the GTAA period and a further 2 pitches for the remainder of the LDP period. The total calculated pitch provision needed for Gypsies and Travellers in Bridgend County Borough is therefore 7 pitches up until 2033.

The GTAA was approved by Cabinet and submitted to Welsh Government for approval in December 2020, in order to ensure sufficient time for formal sign off by the relevant Welsh Minister prior to Deposit Stage consultation. Initial feedback was received from Welsh Government in April 2021 and follow up meetings were held throughout May 2021. The Council submitted detailed responses to Welsh Government on 13th May 2021, clarifying aspects of the interview log and need arising. However, the GTAA was not approved prior to Deposit Consultation. Welsh Government circulated a pan-Wales email on 12th October 2021, which stated, "if you have already submitted a GTAA to Welsh Government and are awaiting scrutiny, we will be in touch as soon as possible". No further feedback has been received from Welsh Government to date.

In the interim, Council Officers have continued to liaise with the families that took part in the GTAA. The seven pitch needs stems from three families:

- Family A has met their accommodation needs by moving to an authorised site in the County Borough, leaving a remaining need for six pitches over the Plan period.
- Family B have now obtained planning permission to re-configure their existing site in Coytrahen and accommodate three households (P/21/677/FUL refers), leaving a remaining need for three pitches over the Plan period.

- Family C own a site, which has been proposed for allocation as a three-pitch site for travelling showpeople within the Replacement LDP (refer to SP7).

Refer also to Background Paper 18: Gypsy and Traveller Site Options.

25 **What is the DP's strategy for employment? Has it been informed by an employment land review? Is it consistent with the requirements of national policy? And has it had regard to the key drivers for change in the employment market?**

The employment strategy and associated evidence base has been prepared in accordance with the Welsh Government Practice Guidance 'Building an Economic Development Evidence Base to Support a Local Development Plan' (2015).

The projected increase in the working age population and the linked dwelling requirement underpinning the LDP will provide significant scope for residents to live and work in the area, supporting growth of up to 500 jobs per annum. 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 (in conformity with PPW).

SP11 sets the framework to enable delivery of a balanced level of employment land to accommodate the new jobs identified through the Regeneration and Sustainable Growth Strategy. This approach is vital to help combat significant levels of out-commuting or shifts to migration profiles, which may otherwise be caused by the lack of a sufficient economic driver to incite and accommodate further job creation. This is considered an unrestrictive and positive approach to ensure that a range and mix of site types are available across the County Borough up until 2033, providing plentiful scope for continued investment without frustrating housing supply. The employment sites identified in SP11 and their roles in delivering the Strategy are based on the recommendations of the 2019 Economic Evidence Base Study (EEBS) and 2021 Update. ENT1 supports SP11 by allocating new employment land for development. ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites.

Achieving a wide and balanced portfolio of employment uses is central to the economic strategy. This will allow the local economy to attract higher value-added intensive employment uses including, life sciences, construction, energy and decarbonisation, and telecommunications sectors. This is in addition to supporting and maintaining the significant manufacturing base and traditional B class uses that

are an important facet and driver of growth for the local economy, now and in the future.

In order to ensure future resilience of the local economy, the Replacement LDP also encourages and support the redevelopment, refurbishment and rationalisation of the existing stock of larger industrial buildings to improve the quality of employment floorspace suited to modern day needs in particular for Small Medium Enterprises (SMEs) that are so important to the Welsh and Bridgend economy.

Refer to the 2019 Economic Evidence Base Study, 2021 Update and Background Paper 7: Employment.

26 **Does the DP allocate land for new employment development? If so, how has the requirement been defined? Have the allocated sites been subject to a sequential search?**

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. ENT1 supports SP11 by allocating 71.7 hectares of new employment land to be brought forward and accommodate up to 7,500 additional jobs over the Plan period.

The employment land requirement has been informed by the demographic projections that underpin the Replacement LDP to ensure alignment with the housing requirement. The LDP's Growth Strategy demonstrates higher underlying population growth in the 20-44 year age bands over the plan period, with a correspondingly higher growth in the youngest age-ranges, 0-14. The higher proportion of growth in these age-groups (than projected at Preferred Strategy stage) is particularly important when considering the link between Bridgend's population change and the size and profile of its resident labour force. Demographic analysis and forecasts of economic activity estimate that this level of growth could now support up to 7,500 jobs over the plan period (i.e. 500 jobs per annum).

The EEBS Update (2021) has identified the economic consequences of this projected boost to the labour force and assessed whether the need assessment and land supply identified in the EEBS (2019) remains sufficient for the Replacement LDP. The Study demonstrated that this proportionate increase in the working age population can be satisfactorily accommodated by the flexibility and margin built into the original employment land supply identified at Preferred Strategy stage. Planning on this basis will ensure the local economy is not constrained from responding positively to the younger (working age) population profile instigated through the Mid-Growth Option. However, this requires retention of all the proposed allocated employment sites (totalling 71.7ha in total, comprising almost all undeveloped parcels within existing estates), which means demand and supply are in balance.

The allocated sites have been subject to a sequential search. The Economic Evidence Base Study 2019 reviewed the suitability of the existing LDP's employment sites portfolio to determine the suitability of existing employment land for reallocation. This process was informed by the SA. All existing employment land allocations were treated as potential rollover sites and thus subject to an equal base-level assessment against sustainability and environmental criteria alongside all new candidate sites. The identification of environmental and amenity constraints through this work informed the assessment of the suitability of the existing employment sites portfolio.

The Economic Evidence Base Study 2019 identified 64ha of remaining undeveloped employment allocated within the existing LDP, of which, 43.7ha was considered suitable for re-allocation to meet 'normal employment need', comprising almost all undeveloped parcels within existing estates. The Study also recommended carrying forward three of the former Strategic Employment Sites, totalling 28ha of land, maintaining two as Strategic Sites and re-designating the small quantum of land at Ty Draw Farm, Pyle as a 'normal' site as opposed to a 'Strategic Site'. Overall, the study therefore supported and informed the re-allocation of 71.7 ha of employment land in total.

In the mid to longer term, enabling re-development of the former Ford Manufacturing Plant (45ha) will provide additional flexibility. This will simultaneously provide a means to replace the 1,700 jobs that have been lost and maximise a key economic opportunity located on one of the County Borough's premier industrial estates. Further work is needed to confirm the quantum, type and mix of new space, yet the site's location and previous economic history would support the maximisation of this economic opportunity.

Refer the 2019 EEBS, 2021 EEBS Update and Background Paper 7: Employment.

27 **Will the DP provide protection for existing employment sites? If so, what protection will be afforded, and how have the sites been selected?**

In order to maintain a sustainable level of employment land, and based upon the recommendations of the EEBS, the Council will protect the sites shown in ENT2 for employment purposes. The safeguarding of existing sites and premises, where appropriate and necessary, will help meet the employment needs of the local and wider economy by providing accessible sources of employment. The intensification and refurbishment of sites and premises identified within ENT2 will be acceptable in principle, subject to proposals satisfying other policies in the Plan. This is especially the case for any such sites or premises which are underutilised, vacant, or in decline. ENT2 acknowledges the existence of these employment areas and seeks, along with other policies, to maintain their use in the future for employment purposes.

The protected sites detailed within ENT2 were subject to review within the EEBS 2019 and are all part of the existing employment sites portfolio, with established employment uses.

29 **What is the DP's strategy for retail development? Does it take into account the envisaged growth in other sectors, particularly housing and employment, over the Plan period?**

Policy SP12 promotes the Town, District and Local Centres as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve. They act as the most appropriate and sustainable locations for new retail, leisure and supporting commercial development. The co-location of facilities and services at such locations will help support their long-term health and vitality as convenient and attractive places to live, work, shop, socialise, study, access services for health and well-being and to conduct business. This approach will also encourage linked trips and a reduction in travel demand, recognising that they are more than the extent of designated retail areas. Major development must comply with the 'Town Centre First' policy contained within PPW and Future Wales, to help build resilient communities, and respond to the long-term impacts of Covid-19, which have not only re-focused the lives of people and communities but acted as a further driver towards making centres multi-functional places.

In recognising that Town, District and Local Centres are moving away from their traditional retail roles, SP12, and its supporting policies, seeks to ensure they become the focus of a wider variety of services and facilities. The 'Town Centre First' approach is key to enabling such centres to increasingly become multi-functional places and community focal points, thereby rendering them more viable as go-to destinations. This will complement efforts to regenerate retail and commercial centres through the creation of more outside space, the re-use of underutilised areas, the start-up of remote co-working hubs, and the focus of more accessible public services.

Despite competition from out-of-centre retail developments, the established hierarchy has continued to evolve over many years. All existing retailing and commercial centres fulfil an important role in meeting residents' shopping and service needs plus their cultural and leisure requirements. SP12 therefore seeks to protect the established retail hierarchy of the area by focussing development in these centres and by only permitting out-of-centre retail development where a need and sequential test has been undertaken, in accordance with national policy, to protect the vitality, viability and attractiveness of retail centres.

The Bridgend Retail Study (2018) calculated comparison and convenience retail needs based on the constant market shares approach, which assumes that existing shopping patterns will remain stable over the LDP period (2018 – 2033). The Study identified limited quantitative needs across the County Borough and qualitative retail

needs in Bridgend (to improve comparison fashion, leisure and the general shopping environment) and Porthcawl (to improve main food shopping offer). This reflects market trends which are likely to influence demand for new retail and commercial leisure floorspace across the LDP period.

A refreshed Retail Study Update was undertaken in 2022 to re-examine retail need within the county borough, trends affecting the retail sector and how this may change over time. It also assessed future needs for comparison and convenience retail floorspace to 2033, based on a range of updated technical inputs.

The 2022 Study now evidences capacity for 12,790 sq.m of additional comparison retail sales area floorspace over the whole plan period (up to 2033) of which there is medium-term capacity for 6,291 sq.m sales area (by 2028). The main reason for additional capacity in the comparison goods sector is higher population growth (an additional 12,709 persons) when compared with the 2018 position. The Study recommends that the comparison need identified should be met within existing town centres in the first instance in accordance with Planning Policy Wales' 'Town Centre First' principle. Accompanying primary survey work has demonstrated more than sufficient capacity to accommodate the comparison retail sales area floorspace identified.

Conversely, the 2022 Study evidences less capacity in the convenience goods sector due to existing commitments. This leaves capacity for just 403 sq.m of additional convenience retail sales area floorspace over the whole plan period (up to 2033), of which, there is no capacity for additional convenience retail floorspace in the short and medium term. The 2022 Study concludes that the strategic sites offer the best opportunity to deliver the shortfall in convenience through local service centres. The illustrative masterplans collectively demonstrate more than sufficient provision to accommodate the small quantum of additional convenience retail sales needed over the plan period.

30 **What is the DP's strategy/policy framework for the following areas:**

a) Welsh language

Local level data does not identify any particular settlement with a notable concentration of Welsh speakers and therefore a specific Welsh language policy is not deemed necessary as part of the Plan. However, consideration of and appropriate provision for facilitates to support the Welsh Language has been factored into different thematic policies relating to tourism (SP16), conservation (SP17) and social and community infrastructure (SP9).

b) Air quality

The Replacement LDP seeks to reduce local air pollution through setting out policies and proposals to promote sustainable and active travel modes. The Plan's effectiveness in this respect has been assessed against the SA

framework. The following proposed strategic policies are predicted to have Major Positive (i.e. significant beneficial) effects on air quality:

- SP2 - Design and Sustainable Place Making;
- SP8 - Health and Well-being; and,
- SP17 - Conservation and Enhancement of the Natural Environment.

These strategic policies provide a supportive high-level policy framework to focus on: environmental sustainability, reduce exposure to poor air quality, protect and improve air quality and safeguard residential and community amenity.

DNP9 also seeks to ensure that the County's natural environment is protected from materially harmful development. This relates particularly to the effect of development on air, noise, light and water quality. DNP9 also seeks to ensure that potential risks to human health are fully identified and assessed.

The Bridgend Air Quality Management Area (AQMA) is currently the only AQMA within the County boundary and is shown on the Constraints Map. Developers are advised to engage in early consultation with the Council's Pollution Control Team to confirm where an Air Quality Assessment (AQA) is required to support an application. This will be considered on a case by case basis having regard to the scale and type of the development. For example, residential development is likely to trigger the need for an AQA, as the issue of primary interest in relation to air quality in the AQMA's relates to residential exposure along the roadside. Mitigation may therefore be required to be demonstrated through an AQA to ensure that the design avoids kerbside development. The scale of development which will trigger the need for an AQA will also be considered on a case by case basis having regard to the location of the development and how it interacts with its neighbouring environments. Where the need for mitigation is identified, the AQA is to demonstrate that appropriate mitigation measures will be implemented to ensure that the development does not cause significant risk to air quality by virtue of emissions from the development itself of the additional new traffic movements it would generate. The AQA will provide further information on the extent to which the development proposed would increase the number of exposed individuals in an area likely to fail UK air quality objectives (proposed or in regulations), either within an AQMA or an area that might become an AQMA if the application were to be granted.

c) Biodiversity and ecological networks

'Biodiversity, Geodiversity and Soil' is a Key Objective within the SA Framework, aiming to conserve, protect and enhance all biodiversity and geodiversity interests, including through safeguarding important sites, species and important soil resources, whilst improving green infrastructure

provision. Full SA site assessments were undertaken to identify the potential effects on sites designated at international, national and local levels for reasons of biodiversity conservation, ecological importance or geological importance. This included assessing each site in terms of its proximity to designated woodlands and important trees or hedgerows, evidence of valued habitats or species and the potential impacts on habitat fragmentation and connectivity.

DNP6 and DNP7 set out criteria which directly support the protection of habitats and species, including woodland and hedgerows, which will have positive effects on biodiversity. Acting together, these policies are therefore expected to result in a Major Positive effect on this SA Objective, whilst providing a net benefit for biodiversity and improved ecosystem resilience. A Green Infrastructure Assessment has also been prepared to guide and shape the planning and delivery of green infrastructure in the County Borough. It forms the baseline for a holistic, positive and proactive approach to the management and enhancement of Bridgend's natural assets, in tandem with LDP's Growth and Spatial Strategy. The Assessment will also provide a mechanism to support the implementation of local planning policies on green infrastructure, with the aim of promoting a green infrastructure approach to land-use planning, design and management. This will help ensure green infrastructure forms an integral and significant part of development and wider infrastructure proposals.

d) The historic environment

Care for the Built and Historic Environment is fundamental to the LDP Strategy and to achieving sustainable development. SP18 has also been prepared in accordance with TAN 24, which provides specific guidance on how the historic environment should be considered during plan preparation and decision making on planning and listed building applications, including locally specific policies for the conservation and enhancement of historic assets. The design and access statement and / or heritage impact assessment and statement accompanying any application for planning permission must, where relevant, clearly set out how the development is compatible with the preservation, conservation, or enhancement of heritage assets

DNP10 seeks to ensure that, where a development proposal affects a listed building or its setting, special regard must be had to the desirability of preserving the building, or its setting, or any features of special architectural or historic interest which it possesses. It also seeks to protect historic assets of special local interest, including heritage buildings and structures.

DNP11 is intended to provide protection from developments, which can harm the character and appearance of a conservation area. Development in or affecting the setting of conservation areas will only be permitted if it

preserves or enhances the character or appearance of the designated area. Applicants must demonstrate how development proposals within or affecting conservation areas will preserve or enhance the special character or appearance of the area.

e) Minerals

SP14 sets out criteria against which all proposals for mineral development will be assessed. Given the variety and diverse nature of such applications, however, other factors such as the need for planning agreements/obligations in accordance with SP10, may also need to be considered for major development. Some mineral sites, because of their scale, provide an ideal opportunity for habitat creation to help meet objectives in the Local Biodiversity Action Plan and the proposed Green Infrastructure Plan. In order to sustain such new habitat, it will normally be necessary to secure funding from the developer to ensure the long-term integrity of the site.

The County Borough is required to meet the apportionments set out in the RTS through the LDP process in order to contribute towards meeting the regional demand for aggregates (both hard crushed rock, and sand and gravel). The total requirement is for 17.471 MT of crushed rock over the next 25 years. The County Borough has a surplus of existing permitted crushed rock reserves in the region of 27.27 MT to put towards this requirement. Therefore, the County's landbank figures for crushed rock is notably in excess of the minimum requirements set out in MTAN1. MTAN 1 requires LPAs to maintain a minimum 10 year supply of aggregates (landbank) throughout the Plan period to ensure that national, regional and local demand are met. The limestone quarries within the County Borough contribute approximately 8.7% of the South Wales region's total crushed rock sales for the aggregates market. At present, the total aggregate reserves (landbank) figure is approximately 42 years.

There is no requirement set out in the RTS for sand & gravel. At present, there is currently no land-based sand & gravel extraction within the Cardiff City sub-region, and this has generally been the case for decades. This is due in part to the ready availability of marine dredged sand from both the Severn Estuary and the Bristol Channel, but also reflects the environmental sensitivity of many of the inland areas which might contain potentially suitable resources.

In accordance with the recommendations contained within the RTS 2nd Review, no future provision for land-won primary aggregates, including allocations for future workings have been identified within the Plan.

A Statement of Sub-Regional Collaboration has been prepared and forms part of the Replacement LDP's evidence base. This confirms the LPAs within the Cardiff City Region accept their apportionments as set out in the RTS2, except for Rhondda Cynon Taf County Borough Council, who wish to undertake further work in relation to available resources within the County alongside awaiting the outcome of the Appeal decisions

f) Waste management

SP15 sets the strategic framework for the sustainable management of waste. Waste reduction is a cross cutting issue and opportunities to prevent or reduce the generation of waste should be made in all development, in line with PPW. When assessing proposals for all types of waste management facilities, the extent to which the development contributes to the objectives and principles set out in the National Waste Strategy (Towards Zero Waste (2010)) and the relevant Sector Plans, in environmental, economic, and social terms, will be a material planning consideration. Developers must clearly justify why a proposal is necessary and that it meets a regional or locally identified need. A Waste Planning Assessment (WPA) will be required to support all applications for a waste facility classified as a disposal, recovery or recycling facility. The WPA must contain sufficient information to enable an assessment of the application and its contribution to meeting the requirements set out in the Collections, Infrastructure and Markets Sector Plans

g) Renewable and low carbon energy

SP13 (and supporting development management policies) will assist the County Borough transition to a low carbon, decentralised energy system that works for its individuals, communities and businesses by encouraging renewable and low and zero carbon energy projects.

As part of the Council's holistic approach to the decarbonisation of heat, ENT10 seeks to ensure that low carbon heating technologies are installed as part of all new major development (heat networks below this threshold will also be encouraged). This policy will also help ensure that development is designed in such a way to not prejudice the future development of a potentially Countywide District Heating Network and enable development to connect to it later once it becomes operational. The precise alignment of the Network will only be finalised following detailed ground investigations and feasibility assessments. Developers are encouraged to discuss the alignment with the Council at an early stage to ascertain whether their proposals are likely to be affected. Proposed developments must demonstrate how the proposal will facilitate a connection to a District Heating Network, or robustly justify why the connection is not technically and/or economically viable and suggest an alternative approach. This robust policy position is justified on the basis of development longevity. Schemes should be able to demonstrate that they are suitable for a net-zero

carbon energy system, otherwise costly retrofits will be required in the future to ensure that carbon targets are met.

ENT11 seeks to ensure that the design and standard of any new development is optimised to achieve energy efficiency and zero carbon emissions. Development proposals must demonstrate that sustainable design standards are integral to the proposal through construction and operation, ensuring that they are considered at the beginning of the design process

h) Transport, and

SP5 emphasises that movement, connectivity and legibility of transport links are critical components in the creation of a successful, sustainable place. An efficient, integrated transport network that prioritises sustainable transport is critical to contributing to decarbonisation and supporting economic growth. SP5 requires all development proposals to consider improving and/or expanding corresponding active travel and public transport networks. This will prove fundamental in ensuring the increasing attractiveness of active travel as a credible alternative to the private car, thereby encouraging modal shifts away from unsustainable forms of transportation, helping to promote physical activity and reducing the impact of transport-based emissions

i) Planning obligations.

Planning obligations will be utilised to secure site-specific (PLA1-5) and thematic-based policy requirements (i.e. Infrastructure – SP10, Affordable Housing – COM2-5). A Planning Obligations SPG will also be developed post adoption to provide additional clarity in this respect.

31 **Does the DP provide a monitoring framework that will enable the LPA to track the implementation of the strategy and policies on an annual basis and, if necessary, trigger a review?**

Yes, the plan will be effectively monitored and contains a clear monitoring framework, which sets out how the Plan's Strategy, Objectives, Policies and Proposals will be monitored against appropriate indicators and trigger points for action (linked to plan review/revision).