

**DRAFT LDP: SITE “PLA 3”,
LALESTON / BRYNTIRION “CIRCUS FIELD”
AND SURROUNDS
PROPOSED 850 HOUSES, ETC.
(Bridgend County Borough Council)**

**NOTES FOR ORAL EVIDENCE SUBMITTED
TO THE WELSH GOVERNMENT INSPECTOR’S
EXAMINATION ON 23.3.2023**

BY

**CHERYL GREEN
PHILIP HARDWICK
CHARLES SMITH**

CHERYL GREEN

My name is Cheryl Green, I represented this ward for over 24 years as a County Borough Councillor and a Community Councillor until May 2022. I was also Leader of Bridgend County Borough Council from 2004 until 2008. I have lived in this community with my family since 1976. I am here to speak in a personal capacity but am aware that very many residents share my views, and also the views of my co-speakers Dr. Smith and Mr. Hardwick.

I do not support the inclusion of the site PLA 3 for a number of important reasons, and I believe these to be sound planning reasons for overruling this proposed development. In the last 20 years, there have been 10 thousand houses built in the borough of Bridgend. Of these, 3 thousand have been built in this ward (Bryntirion & Laleston). In terms of being consistent, this small rural area has provided approximately thirty percent of the housing requirement for the borough in the last 20 years and should not be considered for any further large development as there has already been considerable strain on the infrastructure, this is not consistent with the rest of the Borough. In response to need for affordable housing, then these needs could and should have been met for this area. This particular area is highly unlikely to provide the type of homes that are needed. Its attraction to the developer is obviously its close proximity to the conservation village of Laleston which has the highest average house prices in the borough. In addition, the main road into Bridgend (Park Street) has been identified as the most polluted road in the borough, and it is too narrow to support any cycle path and therefore all efforts should be made to avoid creating yet more traffic at this vicinity.

With regard to the local schools, although the proposal would provide a primary school, the local comprehensive school, Bryntirion, is already over subscribed and is being extended to meet the current needs of pupils as it is desperate now for more space. The current extensions are already taking some of the sport facilities and all available space has been used up. The school library and the sixth form common room have been taken over for classroom space. I have

served on the governing body for nearly 20 years and have spoken with the Chair, Reverend Canon Evans at length about the addition of accommodating another primary school and he is in total agreement that it will be impossible and he is very dismayed at the proposal. Indeed, Bryntirion is probably the only secondary school that is already oversubscribed in the borough, with others desperate for more pupils, a fact which makes the proposal a non-starter in practical terms from an educational perspective. As an example of how difficult the current situation is:- at the last governing body meeting, it was confirmed that the school had received 270 plus applications for 210 places in year seven this year. There is no other secondary school within the allowable safe walking distance of this site, and this would mean any further houses in the catchment area would involve transport, which goes against the whole ethos of avoiding traffic pollution. In addition, the road that serves the school is already heavily used with absolutely no means of alleviating the current pressures of traffic let alone a proposed increase.

The site currently provides a green buffer between Bryntirion and Laleston, its current status is green wedge and any development would definitely mean coalescence between the two settlements, and this would lead to pressure on the buffer zone across the road from this site. The claims of the developer that the conservation village of Laleston would remain discrete are a nonsense as the current buffer zone is not particularly wide, and the circus field that is part of the proposal directly abuts the village boundary.

The reference to a 300 metre buffer cannot be achieved as the “circus field” is included and itself is less than 300 metres and it directly abuts the boundary of the village.

The agricultural land is grade three but with no grade one land in Wales the fact that it is flat means it is important pasture land and should not be built on when there are alternative brownfield sites available. There are also well used, very long-standing public footpaths through the area. In addition the site has been identified by Professor Madeleine Grey as being on the Cistercian Way, and she

has, in the past, written to the Council referring to this. The site contains remains of a medieval village and aerial photos taken after WW2 show the distinct possibility of a former Roman settlement and it is my opinion that nothing should be done with this land that could destroy or damage these sites unless a full archaeological survey has been carried out prior to any development. The lane adjoining the site is part of the Laleston Stones Trail and there are leaflets written by Professor Grey available. I would aver, therefore, that this site is not appropriate for housing development, it will not provide the much needed type of housing required but quite the opposite which like the large Broadlands development would attract many people from outside of the borough, and it will not therefore, deliver the objective. The site is effectively in the countryside and should thus be preserved. I fear that this development, should it go ahead will immediately put pressure on the surrounding countryside.

In conclusion, I would respectfully ask that this proposal be overruled and that alternative sites be identified. This community has already “done its bit” for home provision and therefore it is not “nimbyism” but “enough is enough”. The further effect of yet more housing in such a small area would be disastrous for the reasons that I and my co-speakers have conveyed. The school cannot take any more pupils and has been in the invidious position of when the caretakers house was no longer required, and was then sold, the child living there was unable to attend the school, despite the house being formerly a part of the site. I have not exaggerated any part of the argument but stand by it. I appreciate that houses are needed and there are pressures on officers to deliver but to pander to developers is not the solution.

I am aware that it is difficult to appreciate the situation from maps, but I would be happy to meet with anyone at any time to identify and qualify the points I have made.

Cheryl Green

BA(Hons) Dip Pol Gov

PHILIP HARDWICK

Good morning, thanking you giving me the opportunity to speak and express my dismay that this proposal is still being considered
Appropriate, Consistent and likely to Deliver.

Despite being an Englishman I have lived in Wales for 23 years, 20 of those in Bridgend County and want to protect the flora and fauna we are blessed with. I comment NOT as a self proclaimed “expert” but a nature loving, enthusiastic bird watcher and above all, concerned resident. I can assure you many of my neighbours share the concerns that myself, Cheryl and Charles express. We cherish the biodiversity of the area we share with nature

Appropriate, Consistent, Will It Deliver? I make no excuse in repeating these words as they are your criteria for the LDP, unfortunately ones that we feel this proposal wholeheartedly fails to meet. We are not NIMBYs and understand the pressure that the Planning Inspectors face, however PLA3 fails to deliver on so many counts that it should be deleted and a more appropriate, consistent proposal, as will be outlined by Charles put in place to Deliver. It is a case of NoMoreInOurBackYard having seen how much we have shouldered development in the past 20 years (as highlighted by Carol)

There is an opinion expressed in the Appendices, P15-21 that suggests the land is of **“limited botanical interest, and “species poor”**

Really? I must strongly challenge these assumptions and would invite the Inspectors to visit the fields with me to see just how important this green space is, for all fauna, not just plants. Has the committee not heard of SEWBREC (SouthEastWales BiodiversityRecords Centre) Here I have accessed the records for the 1km square that covers the Circus field and some surrounding landscape. A brief perusal would show you just how much biodiversity **is present** and would be threatened by this development. Starting with insects, 2 Spot and 7 Spot Ladybirds, Red, White and Buff-tailed Bumble Bees, Comma, and Speckled Wood butterflies all sighted last year. Native plants such as Spotted Orchid, Cuckoo

Flower and the **VERY** important Ivy, a food and shelter sure for many species. Fox, Hedgehogs and even a Roe Deer, sighted in June last year. I can not access the Sensitive species records so can not state if Badgers are present, I am sure a **professional** ecologist will and should have. In fact I would challenge the argument put forward on the basis that the Ecologist **allegedly did not** access the available records and thus failed to make a case based on data, just a stroll around the fields.

I must assume you are aware that the UK is already one of the most nature depleted countries in the world, yet this proposal which continues this alarming trend is put forward as appropriate! Likewise it is NOT consistent with the Council's own objective to maintain AND enhance the natural resources and bio diversity of the county borough. I have personally watched Pipistrelle bats hunting along the mature hedgerows that this development would likely destroy, are these protected mammals no longer to be considered worthy of that protection? Will integral bat boxes that cannot be removed be integrated into the new build houses? The same hedgerows and untouched woodland that act as wildlife highways bringing wildlife in to our urban areas too. I have regular visits from multiple Hedgehogs in my nature friendly garden as does Charles who has Frogs in his pond as well, just last week I caught on camera a Fox in my garden. While I know lots of people are so out of touch with nature they would be horrified by these creature, I feel it is hard to argue they do not deserve our protection

Let us now consider bird life, I am sure the Planning Committee is aware of the disturbing fall in population of House Sparrows and Starlings which have fallen by 60 and 66% respectively since the mid 70s, and even higher in more recent years (80%) Are these now Red-Listed species to be considered of **limited interest** too? I have watched Sparrows in the hedgerows and Starlings foraging for food across these fields, during winter and even more importantly the breeding season. Bryntirion has significant numbers of breeding birds that rely on this habitat. Add to this the Redwings and Fieldfare that over winter around us and you can see just how important this

supposedly bland ecologically bereft land actually is. Again, come and walk with me and look and listen to what could be lost.

I fear the inevitable increase in disturbance from this proposal is too great a price to pay. More cats roaming and killing, more dogs off the lead and children using the woods abutting the site as their playground will all reduce the biodiversity, once again **NOT Consistent** with the aims of the council. One only needs to look at the litter along Llangewydd Lane at present levels to fear what would come from increased usage.

PLA3 is also very concerning in the threat that it poses to these ancient oak trees to the north of this site, along Llangewydd Lane. These fields are not in this proposal I hear the developer cry, but one thing we can be sure of is **Developers love to develop**, it is what they do and should this proposal be granted permission and the precedent set for entering into the rural landscape, the “Arboculture” mentioned in p19 of the appendices will be nothing to what we see next. The land to the west and north of Bryntirion will become part of the great Bridgend expansion zone linking Laleston, Roger’s lane, Court Coleman and Pen-Y-Fai

The committee will be aware of the dire air quality along Park Street, is it appropriate to rip out the mature trees of these fields, the ones that have taken years to become effective filters. Is this consistent with ensuring this pollution does not get worse, which it will with this car dependent proposal. Will these actions deliver, only if more expensive houses and developer profits are the desired result.

Can I ask why the significant history of the area in this proposal has been dismissed by the developer? As far as we can see no preliminary archaeological surveys have been undertaken to ascertain if the remains of St Cewydd’s Church, built in the 11th Century will be in danger of destruction from the building work? There is already a CADW reference for this area which was designated of national significance in **1955**. I trust the committee is aware of the objection to this proposal that has been lodged, by more learned people than me due to the I quote.. “significance of the settlement in our

understanding of the development of the farming landscape” and particularly knowledge of the Cistercian religious order

Particularly important in this statement are the field and hedgerow layout, the same ones that the developer would destroy. **The same ones that provide highways, shelter and food, yes those same ones I have already highlighted.** The protections and mitigations proposed are, in my humble opinion, not worthy of the paper they are printed on.

In conclusion I would like to say that while it is difficult to monetise the value of these fields, hedges and trees, to the animals relying on them they are priceless. We should not forget the value to us humans too, for mental well being, the calming effect of a walk in nature should not be underestimated, especially in these post Covid times.

I urge the committee to reject PLA3 and replace it with a less environmentally damaging, more appropriate vision that will deliver on providing access to natural open space, saving important landscapes and the historical, and as yet not properly studied archaeological environment

Thank you for listening and please, think hard about the consequences of allowing this, and the inevitable subsequent green field developments that would surely follow. As I said at the time, I am willing to meet with members of the planning committee to highlight the points raised, walk around the site and view the flora and fauna that this development **will** inevitably destroy forever

NB for the Inspector, I did respond on the day to the statement that the sewer and drainage system being installed was adequate and up to standard. My challenge was that the current standards are woefully inadequate, the dumping of raw sewerage into rivers is a nationwide disgrace and to state they meet this standard is not something to be proud of

Mr Philip Hardwick

CHARLES SMITH

Inspector, I am Dr Charles Smith. I am a retired university lecturer in economics, a Laleston Community councillor for 30 years or so, and previously a county councillor and cabinet member of Bridgend County Borough Council. I have lived in the western Bridgend area since 1976, both of my children and most of my grandchildren and nieces and nephews were brought up or are being brought up in Western Bridgend.

I am speaking in a personal capacity, but along with Mrs Cheryl Green and Mr Philip Hardwick, we are also here to represent a very large number, several hundreds of local residents who have objected to Strategic Site PLA 3. and who believe that their sound planning reasons for objection have not been taken seriously by the Planning Authority, I would go as far as to say that valid objections on planning grounds have been wrongly dismissed, and we ask you Inspector, please to consider our objections and overrule the Planning Authority on this one issue.

We argue that as it stands the LDP is unsound.

It is extremely well prepared and the due processes have been followed meticulously by professional officers..

However, subjective judgements and missed evidence have combined so that

- * The LDP is not appropriate. And

- * The LDP does not fit.

The LDP does not deliver what it claims to deliver.

This is due to a lack of balance.

PLA3 contributes very significantly to this lack of balance.

We argue that it is unbalanced historically in that current housing allocations are piled on top of previous ones; unbalanced in terms of greenfield versus brownfield, affordable versus expensive, and north versus south.

The LDP is particularly unbalanced and unsound with respect to PLA3, where as Cheryl Green points out, over the years a remarkably

large proportion of housebuilding has been concentrated in just one council ward rather than being spread among all 28 wards.

The LDP is also particularly unbalanced and unsound with respect to PLA3 where the proposals violate a large number of the Council's own planning principles and policies.

There is a remedy.

To be specific, Inspector, we ask you to delete Strategic Site PLA3 from the LDP, and replace it with an alternative, which we will outline, and which we believe would remedy some serious misbalances and deficiencies and result in a much better overall LDP and much better planning outcomes. Replacing PLA3 with a more imaginative alternative is a necessary and sufficient condition to mitigate the misbalances, and therefore render the whole LDP "sound" instead of "unsound".

Nothing we say should be taken to criticise planning officers. We recognise the difficulties they are faced with. We know that the planning system is heavily weighted towards the interests of private developers, and we feel that when we speak to BCBC planning officers we are dealing with professionals who are dealing with processes that present great pressures and many risks. For objectors like ourselves, to use three different metaphors, all of which are true, it is a David versus Goliath situation, a heavily sloped playing field, and through the appeals system developers get more than one bite of the cherry while residents, councillors and planning officers get only one.

When we compare our arguments with the content of the proposed LDP, it is evident that planning is by no means an objective science. The document is littered with subjective judgements and assertions which without evidence to support them add up to major differences of opinion about outcomes.

There are many factors at play, and one of these pressures is the stress we all have to cope with resulting from mandatory housebuilding targets.

It's glaringly obvious that the main driving force behind this LDP is the need for planning officers and responsible councillors to meet mandatory housebuilding targets. This was the case in the previous LDP, and the one before that.

I would ask, Inspector, have these targets over the years delivered affordable homes for young people, smaller units for retired people, accommodation for homeless people, and better service for those who are badly housed?

No, they have not.

We are dealing with a failed housing market, and where housing projects have been developer led we have a sub optimal planning system

All they have delivered is profits and bonuses for landowners and property developers, car-dependent estates on greenfield land, identical developments regardless of location, low density detached and semi-detached boxes out of reach of those who most need them, and a catastrophic shortfall of affordable homes.

The PLA3 proposal promises more of the same tired old formula.

The site of PLA3 is widely regarded as a beautiful green gateway into Bridgend. It is so unimaginative to take this ancient and well-loved green gateway to the western entrance to Bridgend and urbanise it with a rash of low-density boxes. There is no shortage of such dwellings in the county of Bridgend, least of all, as Cheryl Green argues, in western Bridgend.

I ask you Inspector, please, if you have not done so already, to visit the site of PLA 3, and walk about. Please start from Laleston Church,

and follow the ancient public footpaths nos. 11 and 11A. The footpaths date back to medieval times, and the lane now known as Llangewydd Road, which borders the north of PLA3 is ancient; it is recognised as a prehistoric ridgeway, as a pilgrim route, and as a drovers road It is a possible indicator of significant Roman archaeology in the vicinity.

I will now indicate a selection of instances where PLA3 violates Bridgend County Borough Council's own planning principles

I will refer to **pages (P)** and **paragraphs (Pr)** of the **Deposit Consultation Document**.

P.74, Pr. 52.21: Coalescing of communities

References in this paragraph claiming that the development would “form a natural green buffer” is nonsensical. The proposal takes a green gateway, which is green and undeveloped precisely because it is already a “natural green buffer” beyond the built-up boundary of Bridgend, and urbanises it by shifting that boundary to the west, encroaching on a Special Landscape Area and covering the green space with housing. The contents of this paragraph are not consistent with the “Masterplan Development Principles” mentioned at **P.71, Pr.(d)**.

In **Appendix 5, P.20** the statement by the consultants engaged by the developer are open to serious challenge. that there are “no significant effects” on Laleston village which will “retain its character as a discrete settlement” and that coalescence has an “impact of a minor order”. These are highly subjective, unevidenced value judgements.

P.71, Pr. (a) refers to an “urban extension of Bridgend”. This clearly contradicts the claim that communities are not being coalesced.

Residents are entitled to ask: Would the developer market these houses as being located in Bryntirion or Laleston? The Laleston address would

be very tempting, adding a substantial premium to house prices, while undermining the already bogus argument that communities are not being coalesced. Residents have stated that PLA3 is based on “greed not need”.

I would like to remind everyone that post-war development and further speculative building since the 1970s has urbanised the areas of Western Bridgend which include West House, Cefn Glas, Llangewydd Court, Broadlands and Bryntirion. Meanwhile, currently, the council ward known as Laleston, Bryntirion and Merthyr Mawr, remains officially classed as a “Rural” ward, certainly for the purposes of the EU rural development fund, which is still supporting projects in the area.

The LDP document concedes that PLA3 is an “urban extension”, and it follows that this site is best described as a “development outside defined settlement boundaries”.

All the above must mean that **DNP1 on P.186: Pr. “The Countryside and Landscape”** applies to this site. The planning policy states: “All development outside defined settlement boundaries must ensure that the integrity of the countryside is conserved and enhanced. *There is a presumption against development in the countryside.*”

I repeat : **There is a presumption against development in the countryside.**

The developers have made no effort to demonstrate that any of the 13 exceptions listed under **DNP1** apply to this site. Furthermore, they have not demonstrated any housing need at this particular location.

The development would inflict a serious loss of valued landscape and visual amenity. It would violate historic rights of way, which have always been treasured by local people and nurtured by the Community Council, and which are even more vital to well-being and future generations in a post-Covid context. The so-called green corridors the developers would leave behind would present a comparatively miserable aspect, and once the developers have made their profit and

left the area the responsibility for and cost of their upkeep would pass on to the community. This raises the serious issue of sustainability. These aspects alone provide sufficient reason to dismiss the site as they are contrary not only to published Council planning policy but also acts of the Welsh Parliament and fundamentally to Wales's basic constitutional commitment to sustainable development.

PLA3 is a pre Covid, pre-Brexit. Pre-Ukraine proposal. It undervalues the mental health benefits of green space, the new priority people attach to open areas, and the need to use available land for food production as well as recreation. For those reasons alone this LDP warrants an agonising re-appraisal, at least in part.

The proposed development is clearly in conflict with the following principles of good planning as outlined in the draft document.

P.27, LS1: Important landscapes

LS2: Historic environment

P.182, SP17: Conservation and enhancement of the natural environment

P.193, DNP5: Local and Regional Nature Conservation Sites, including DNP5(2), Site of Importance for Nature Conservation (SINC)

In the draft document, **Page 71, Pr.(a)**, the would-be developer makes light of the above considerations. A SINC and Scheduled Ancient Monument are mentioned, without any proper consideration of their significance. **Pr.(c)** mentions trees, hedgerows and habitat. **Pr.(d)** mentions landscape, a Special Landscape Area, and a "sense of place". No detail is attached to any of these topics, the underlying issues are skimmed over. Merely mentioning these aspects will not do. The onus is on the developer to demonstrate that all these aspects can be fully mitigated.

Appendix 5, P. 15-21, contains the findings of consultants, which are open to challenge as being incomplete, inaccurate and biased.

Opinions expressed by consultants on certain areas such as “limited botanical interest” and “species poor” are unevidenced and some are manifestly untrue.

In contrast, our submission from Philip Hardwick provides an ecological and landscape survey which is evidence based and benefits from close fieldwork observation

Statements on **P.19 Pr. “Arboculture”** put in plain sight the applicant’s intention to destroy trees.

In **P.20, Pr. “Archaeology”** seriously understates the historical importance of this area and its tourist potential. The Laleston Stones Trail researched by the Community Council together with Professor Madeleine Gray, and supported by Bridgend County Borough Council, is of recognised importance. The written historical record, together with the experience of local people who use the extensive Rights of Way network is that there is a definite “sense of place” which would casually be destroyed, judging by the cavalier attitude revealed by the developer and their consultants in these pages. Roman specialist archaeologist Karl-James Langford considers the possibility of Roman remains as “significant”.

The development puts pressure on the field known as Cae’r Hen Eglwys. On **P.73, Pr. 12**, an unsubstantiated claim is made, that the development would “positively integrate” the remains of Llangewydd Church and Churchyard Ancient Monument, “in a manner that preserves and enhances the remains as part of the wider site.” In truth, this ancient monument and its standing stones would be endangered by this development.

In **Appendix 5, P.17, Pr. “Land Ownership”**, it is claimed that Llanmoor Development Co. Ltd. has “complete control over the whole land-holding”.

This raises questions. If these claims are true, why is the field “Cae’r Hen Eglwys” not included on the map within the development boundary? Is there an agreement with the owner of the field? Also, what exactly is meant when the text refers to the “wider site”?

In the absence of answers within the documentation, it is reasonable to conclude that the would-be developers have an eye on the future, and permission to build up to Llangewydd Road Lane would be followed by further applications, putting pressure on the planning system for permission to cross the road and develop onwards towards the railway main line, the motorway and village of Penyfai.

Imbalance

Four of the five of the so-called “strategic sites” in the deposit plan are in the Bridgend constituency, only one in the Ogmore constituency. Three of the five are south of the M4 and it is only the “sine wave” shape of the M4 at Pyle that puts the Cornelly site just to its north.

As other commentators to this inquiry have suggested, a major opportunity at Bettws has been missed. This settlement could, with political will, form the basis of an attractive and affordable “new town” type of development.

The north-south imbalance occurs for alleged reasons which result from previous planning decisions, largely involving out-of-town shopping areas close to the M4. The decisions that have made a motorway junction (J.36) a destination in its own right, thus contributing to the disrupting of north-south traffic flows, and apparently making the north of the county a no-go area for developers, are historic and cannot now be rectified without major expenditure from Welsh Government level. However, the imminent danger of further imbalance in the vicinity of Site PLA3 can be tackled at county level.

Contrary to what desk research might reveal, local knowledge is that people from Western Bridgend travel via Penyfai and join the M4 at J36. Indeed, that is the route recommended by the SatNav. The new residents of PLA3 would soon discover that route. They would also access the town centre via the most air polluted road in Bridgend County, the A473 at Park Street. In our “Greater Island Farm” proposal (detailed below) car travel is far more likely realistically to be directed towards J35 without going through a “rat run” nor through the town centre.

There is generally a discernible lack of local knowledge in the deposit document concerning PLA3. Meeting with local people who have historical memory, and individuals with specialist knowledge, together with substantial evidence of much fieldwork on the ground, is missing. There is a possibility of over reliance on satellite maps, desk research, abstract modelling and value judgements.

A better alternative: a “Greater Island Farm” Strategic Site Integrated Quarter

A better balanced and more sound LDP can be achieved by the simple method of deleting the site PLA3 from the draft LDP and replacing with a viable alternative. Deletion would help BCBC to avoid violating its own place-making ambitions and policies. To replace it we suggest that two brownfield sites be brought into the picture. These are sites that are not considered within the draft LDP, as their availability has only been confirmed recently. These two sites are likely to be viewed by the Council as post LDP “windfall” sites. We argue that this would be another missed opportunity.

PLA3 is an example of a bad planning site, whereas PLA2 (Island Farm) is to be commended as a good planning site. It is largely a brownfield site, with conservation areas, and a listed building (Hut 9 of the historic Prisoner of War camp) which will of course be protected and has proven tourist appeal. There is a secondary school nearby (Brynteg) with capacity for expansion. Good active travel links to the

town centre are already becoming available, and there is excellent potential for more, utilising attractive routes across Newbridge Fields, which could include a riverside walk. Land for A48 improvements has been protected and there would be Section 106 provision for road widening and junction upgrades.

There is even long-term potential fairly close by for a new metro station on the Vale of Glamorgan Railway, which passes under Ewenny Road not far from the site. This possibility has been raised in previous planning projects, but not in this LDP.

The PLA2 plan includes a primary school, and a new campus for Heronsbridge School, and there is a declared council ambition that this would become recognised as the best special secondary school in Wales. The neighbouring landowner has permission and further plans for leisure facilities, including tennis, swimming and equestrian sports.

It is nowhere mentioned in the LDP document that relocating Heronsbridge School would create a vacated brownfield site with potential for housing at Ewenny Road. Immediately next door, at Cowbridge Road, another brownfield housing site, again not mentioned in the draft plan, is due to be created by the council-college joint project to relocate Bridgend College to what would be a council owned town centre site, at Cheapside.

We therefore propose that PLA3 is deleted from the draft document and replaced by a new strategic site comprising Island Farm, Ewenny Road and Cowbridge Road, these three areas connected through a hub revolving around Brynteg Comprehensive School and also linked to the Science Park at Technology Drive off Ewenny Road.

A vision for a “Greater Island Farm” Strategic Site Integrated Quarter might be radical and unusual, but in a good way, focussing not just on housing, but also encompassing active travel, education, leisure, tourism, and employment.

The housing allocations here would ideally consist of high-quality town housing including social and affordable allocations. This could focus on the smaller dwellings that are identified as a shortage on **P. 29, Pr. LS11, of the LDP document** and this would be far more appropriately matched to identified needs than the PLA3 proposal. There would be a truly mixed integrated quarter, with housing education, leisure and employment.

Overall, these amendments to the development plan would serve to enhance council ambitions for the town centre, while saving green open space at Bryntirion/ Laleston for future generations, redistributing demand for school places to match supply more closely, prioritise brownfield over greenfield, development, support conservation and biodiversity, reduce car dependency and improve housing affordability. Close to public transport hubs and existing active travel, car dependency would be less, and unlike PLA3 most car journeys would avoid the county's most air polluted route, along Park St, and would join the M4 at J 35 instead of the congested J36\

Deleting PLA3 would align the LDP more closely with the environmental issues identified on **P.27-29**, in particular:

LS1 – important landscapes

LS2 – historic environment

LS6 – areas with known poor air quality (the A473 at Park Streer)

LS7 – highway network congestion (Bryngolau, Merlin Crescent, Broadlands A473 traffic lights, Broadlands A48 roundabout, Heol y Nant)

LS10 – shortfall in affordable housing

LS 11 – shortage in the provision of smaller dwellings

LS14 – accessible natural open space.

In a nutshell, deleting PLA 3 and replacing it with an integrated strategic vision and masterplan for “Greater Island Farm,” would provide the right type of housing in the right place instead of the wrong type of housing in the wrong place.

The deposit document indicates that the would-be PLA3 developers have a 10 year timeline for their project. We can only guess as to why their time line is so long, we can speculate for instance that it might be linked to their wish to avoid releasing houses so quickly that their prices are depressed. Whatever the reason, it means that our alternative proposal, while bringing brownfield sites into use, might well have a shorter time frame, bearing in mind that land ownership is already in the hands of council and college.

Our alternative would be a council-led strategy instead of a developer led strategy. Instead of being subservient to the private sector focussed on housing the council would be in partnership with private and social housebuilders and wider range of stakeholders, including Welsh Government for a truly mixed development.

The council already has a track record of success where it takes this kind of lead, as it has done and is doing in Bridgend town centre, Maesteg and Porthcawl.

I cite the provision of attractive, affordable town centre flats along with the modernised multi storey car park at The Rhiw, Bridgend, as just one example.

A clear disadvantage of a developer led site like PLA3 is that while the developer provides a primary school site, it is assumed that money can buy secondary school places nearby. This is not possible at Bryntirion, where the school is only now being given extra buildings to accommodate classes generated by previous LDPs, and further expansion is rendered impossible due to serious highway issues in the vicinity of the school. Sending pupils from PLA3 to Brynteg causes further road congestion and violates the 20 minute neighbourhood concept the Council has signed up to with the Placemaking Charter. Far better to send them just over the road from one of the areas within the Greater Island Farm Quarter.

Inspector, our proposals would rebalance the LDP, making it sound instead of unsound. It would avoid repeating historical mistakes and

improve the quality of the LDP not just in the back yards of Western Bridgend, but strategically for the whole County of Bridgend.

Dr. Charles Smith

BScEcon, MSc, PGCE, PhD, FHEA, FCIEA.