

**BRIDGEND**  
**REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)**  
**EXAMINATION**

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**SCHEDULE OF MATTERS, ISSUES AND QUESTIONS**

**Matter 4: Productive and Enterprising Places – Employment and Infrastructure**

*Issue - Is the economic strategy coherent and based on a clear and robust preparation process? Will it address the Key Issues and Strategic Objectives effectively and efficiently? Are the policies realistic and appropriate in the light of relevant alternatives and are they based on robust and credible evidence?*

***Employment***

**1. Is the Economic Evidence Base Study based on robust and credible evidence? and are the findings sufficient to inform the Plan's economic strategy?**

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 Economic Evidence Base Study (EEBS 2019, SD69) was completed in 2019 and undertook an employment land review, calculated employment land requirements and considered both local and 'larger than local' employment factors in the context of the Replacement LDP's growth strategy. The EEBS provides evidence-based recommendations on the scale and distribution of employment need, the land best suited to meet the need, plus related policies and site allocations. A supplementary update (Economic Evidence Base Update, 2021, SD70) was also undertaken in 2021 to consider the workforce, jobs and economy implications arising from the refreshed 2018-based projections (WG published new sub-national household and population projections in August 2020) together with impacts of the Ford Manufacturing Plant closure in September 2020. This refreshed evidence base is robust and credible, fulfils the national policy requirements set out in Planning Policy Wales (PPW) and provides a transparent basis to inform the Replacement LDP.

A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The EEBS and 2021 Update analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and

the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in Employment Background Paper 7: Employment (SD40), and set out in Policy SP11.

## **2. What are the key drivers for change in Bridgend's employment market? and how has the Plan addressed these considerations?**

The economy of Bridgend County Borough is relatively more reliant on the manufacturing sector than Wales as a whole and there is need for the area's strong manufacturing base to be maintained within sustainable locations, whilst supporting the socio-economic renewal of deprived communities. It is equally important to diversify the employment sector and attract inward investment across the locality through sustainable economic growth. The Replacement LDP has a key role in this respect, notably in safeguarding existing employment provision, allocating suitable sites for development and delivering the infrastructure required to boost socio-economic opportunities and enhance connectivity. This inter-related approach is key to meeting the needs and requirements of a range of future potential employment scenarios, thereby ensuring the LDP can enable economic recovery from the pandemic and ongoing prosperity.

Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Replacement LDP does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within Background Paper 2: Strategic Growth Options (SD35), the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace-based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs. The projected increase in the working age population and the linked dwelling requirement will provide significant scope for residents to live and work in the area, supporting up to 500 new jobs per annum. Hence, 71.7 hectares of available land is allocated for employment development to meet the needs of the employment market and accommodate the new jobs identified.

Achieving a wide and balanced portfolio of employment uses is central to the RLDP's Strategy. This will allow the local economy to attract higher value-added employment uses (including life sciences, construction, energy, decarbonisation and telecommunications) as well as supporting the significant manufacturing base that continues to be an important facet and driver of growth for the local economy. This approach will help minimise the need for out-commuting and promote more self-contained, inter-connected communities, thereby achieving an equilibrium between the number of homes provided and the job opportunities expected.

The Growth Strategy can be succinctly explained by the acronym **'CARM'**, which summarises the Strategy's intentions to **C**ounter-balance the ageing population by **A**ttracting skilled, economically active households, **R**etaining skilled, economically active households and rendering the County Borough a **M**agnet for employers to expand within or move into.

### **3. How many new jobs are estimated to be created as a consequence of the Plans economic strategy? And in what sectors?**

The Economic Evidence Base Study (EEBS 2019, SD69) and Update (2021, SD70) have modelled the relationship between population and employment using key assumptions on economic activity rates, unemployment and commuting. The latest suite of 2018-based scenarios result in a more positive impact upon labour force projections than the 2014-based scenarios, with higher working age population growth. This is particularly important when considering the link between Bridgend's population change and the size and profile of its resident labour force.

The EEBS Update (2021, SD70) utilised Experian modelling to forecast the Replacement LDP's Growth Strategy could support up to 7,500 employed people over the plan period (i.e. 500 per annum), based on the latest assessment of economic activity rates. However, the Study concluded a positive employment land response would be required to ensure businesses will wish to expand and/or set up in Bridgend as a consequence of the increase in labour supply. Therefore, the Replacement LDP seeks to ensure a matching supply of employment land will be made available to accommodate all 7,500 new jobs on the basis that the new homes and labour will stimulate the economy. Otherwise, there would be a lack of economic opportunity, which would constrain take-up of employment land, prevent local job creation, risk excessive out-commuting and stimulate a negative long-term shift in migration profiles.

The demand for labour is also modelled by linking local area demand to the regional demand for jobs for each industry sector. In terms of predicting future growth in sectors, the EEBS states that it is not appropriate to simply 'scale up' the sector forecast because some sectors are forecast to decline and the increase in labour is unlikely to arrest this trend. It is deemed more appropriate to consider the 'growing' sectors with the expectation that these will grow faster in response to the larger labour supply. As such, it is reasonable to assume that approximately half of the job growth is likely to take place in jobs associated with 'people servicing' activity, notably the public service sector (42%) and accommodation, food services and recreation (8%). Growth is also expected in construction (8%), wholesale & retail (17%), transport & storage (8%), information & communication (8%) and professional services (8%).

Predicting the future number of new jobs by sector is not an exact science. Therefore, the (EEBS 2019, SD69) and Update (2021, SD70) make the very positive assumption that all new jobs generate demand for new B class floorspace

space and each new worker (employed person) needs new space for one new job. While not all jobs will indeed require B class land and floorspace, the evidence base has erred on the side of caution. This will ensure the amount of employment land allocated is sufficient so as not to constrain the economic growth required to provide 7,500 job opportunities. Otherwise, if the LDP failed to provide suitable employment land to enable this forecast to be realised then economic growth would be constrained, thereby hampering fulfilment of the Aims and Objectives of the Plan.

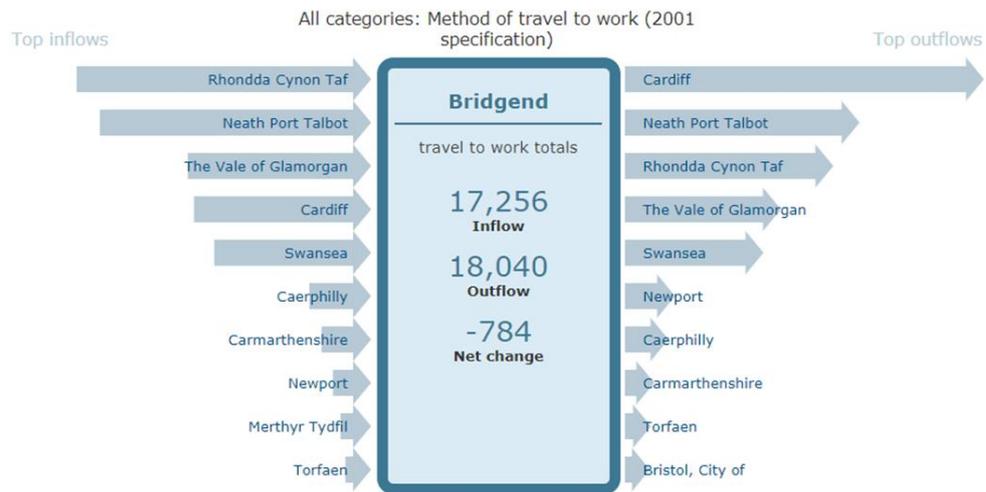
Achieving a wide and balanced portfolio of employment uses is central to the economic strategy. This will allow the local economy to attract higher value-added intensive employment uses including, life sciences, construction, energy and decarbonisation, and telecommunications sectors. This is in addition 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. Refer also to SD40 Background Paper 7: Employment.

**4. What is the cross-border employment relationship? what proportion of the existing jobs within Bridgend are filled by employees from outside the County Borough? how many of Bridgend's residents travel to work outside the County Borough? and how has this movement been accounted for in its employment forecasts?**

Commuting is a complex issue and cross boundary commuting is not automatically unsustainable. In some parts of the borough, the most sustainable location for people to work may be in a neighbouring authority and vice versa. However, the cross-border employment relationship has been accounted for in the Experian economic modelling that underpins the EEBS (2019, SD69) and EEBS Update (2021, SD70).

In the first instance, the EEBS has assessed the patterns of commuting flows in and out of Bridgend taken from the 2011 Census (the most relevant data at the time of publication). As can be seen from the below, movements are almost balanced, with Cardiff being the main destination for commuters from Bridgend.

The overall marginal net outflow is almost entirely attributable to commuters heading to Cardiff, with movements from Bridgend to neighbouring authorities being generally balanced. This pattern of commuting to Cardiff is not seen as a particular concern given the size of Cardiff's economy and office market will attract higher paid professional / private services jobs.



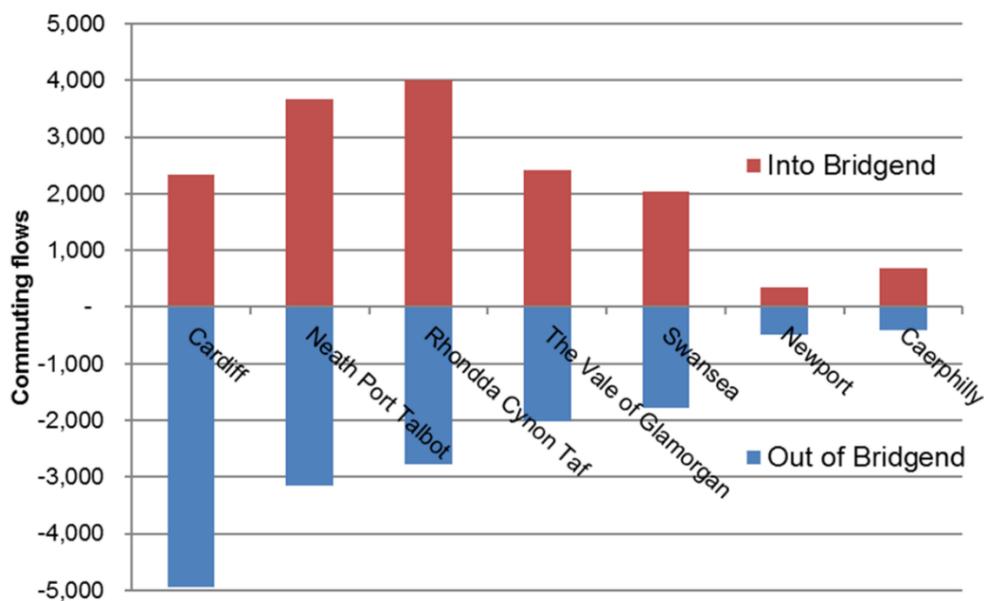
Commuting totals (all categories: method of travel to work (2001 specification)) for Bridgend:

- Inflow: 17,256 person(s) commute into Bridgend from other local authorities in the UK.
- Outflow: 18,040 person(s) commute out of Bridgend to other local authorities in the UK or abroad.
- Net change: Overall, commuting results in a population decrease of 784 in Bridgend.

Source: ONS, Census WU03UK - Location of usual residence and place of work by method of travel to work

[See more visualisations by Nomis](#)

The chart below illustrates the movement patterns numerically and show some 5,000 residents commute to Cardiff. In all other respects Bridgend has a positive commuting story, with the net balance made up by short distance commuting into Bridgend from neighbouring authorities.



For the purposes of the EEBS Update, this historic commuting data has been used to inform the Experian economic forecasting. Experian's modelling can be summarised as the resolution of demand and supply for labour, taking into account commuting flows between local areas, and the local labour force is derived by applying the economic activity rates of those aged 16+. The demand for labour is also modelled by linking local area demand to the regional demand for jobs for each industry sector. Overlain are commuting flows based on historic patterns (as explained above). A method paper explaining the approach in more detail is appended to the EEBS Update (2021, SD70).

The EEBS forecast has taken past commuting flows into account in determining how Bridgend will respond to economic growth and the additional labour force over and above the baseline. The forecast suggests 7,500 extra residents of working age (16+) will be generated by the Replacement LDP's Growth Strategy, equating to 7,500 new jobs over the plan period.

However, without a positive employment land response through the Replacement LDP, the economic forecaster's view is that only 900 of these people will find employment in Bridgend, and commuting out will rise, but only by a relatively minor 200 persons, most likely to jobs in Cardiff and Swansea. Without sufficient economic land supply in Bridgend, the local economy is not forecast to generate sufficient jobs for all, so by 2033 almost half (3,500 people) are added to the total unemployed. The remainder (2,900 people) become economically inactive, these are people who are referred to as 'discouraged workers'.

The LDP has responded positively to this forecast by allocating enough B-class employment land to ensure that there is opportunity for economic growth to provide employment opportunities for all those people who are otherwise forecast to become economically inactive. This is on the basis that businesses will wish to expand and/or set up in Bridgend as a consequence of the increase in labour supply, leading to the Borough returning to virtual full employment.

The evidence base has aimed to ensure enough land is identified in the LDP so as not to constrain opportunities for all to find employment, including the unemployed and those discouraged workers. Equally, this approach has ensured the existing net commuting balance can be maintained over the plan period by maximising opportunities for residents to live and work within the County Borough and thereby counteracting the need for out-commuting. Refer also to SD40 Background Paper 7: Employment.

**5. Is the level of employment land provision identified in Policy SP11 appropriate?**

**a) How has the overall figure of 71.7 hectares been derived? is the level of employment land provision fully justified and supported by robust and credible evidence?**

The EEBS 2019 (SD69) analysed labour supply, past take-up of employment land and labour demand (through an economic forecast) in order to determine the level of jobs and employment land needed to underpin the Replacement LDP. This triangulation of methods evidenced need to provide up to 60 ha of employment land over the plan period, or 4ha per annum. This consisted of 2 ha to manage baseline growth and an additional 2ha buffer to manage the possible labour supply and employment demand stemming from the Mid-Growth Option, should all of these new jobs require B space provision. This level of employment land provided capacity to accommodate slightly more jobs (333) than additional employable people (266) per annum, providing a small contingency should new job creation be more biased to industrial as opposed to office uses.

In order to meet the need, the EEBS reviewed the suitability of the existing LDP's employment sites portfolio to determine the suitability of existing employment land for reallocation. 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 18 sites, which totalled to 71.7ha, to meet the identified need. The allocation of marginally more land than the assessment of need suggests (a positive margin of 11.7 ha or 0.8 ha pa) was considered pragmatic to allow for flexibility and contingency in terms of delivery, should the mix of potential jobs differ or land not come forward as expected. The Preferred Strategy adopted these recommendations to ensure plentiful employment land to meet the needs and requirements of a range of future potential employment scenarios. This aimed to help minimise the need for out-commuting and promote more self-contained, interconnected communities in accordance with the LDP Vision.

The EEBS Update 2021 (SD70) considered the economic impacts of the increase in working age population identified in the new Welsh Government demographic data (the 2018-based PG-short term migration scenario), This notably analysed the projected boost to the labour force and assessed whether the need assessment and land supply identified in the EEBS (2019) remained 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.

71.7ha is considered optimal to achieve an equilibrium between the number of homes provided and the job opportunities expected over the Replacement LDP period. The level of employment land provision is therefore considered fully justified and supported by robust and credible evidence.

**b) Does Policy ENT2 clearly differentiate between allocated and committed sites? are the sites realistic and economically viable? and are they free from significant constraint and deliverable over the Plan period?**

In order to maintain a sustainable level of employment land and based upon the recommendations of the EEBS (SD69), Policy ENT2 of the Replacement LDP will protect the sites indicated 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 Policy 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. Policy 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 Policy ENT2 were subject to review within the EEBS 2019 and are all part of the existing employment sites portfolio, with established employment uses.

Where undeveloped capacity exists within these sites, the quantum of undeveloped land has been included within the future employment land supply in Policy ENT1. This comprises undeveloped parcels within existing viable employment estates that the EEBS 2019 considered free from constraint, deliverable over the plan period and therefore suitable to re-allocate. All sites within Policy ENT1 and Policy ENT2 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 as part of the SA/SEA of the Deposit Plan. The identification of environmental and amenity constraints through this work informed the conclusions of the EEBS of the suitability of the existing employment sites portfolio, as to form an effective part of the employment land supply each site must be broadly acceptable in planning terms and deliverable. (Please see Appendix B of the EEBS).

**c) Is the hierarchy of employment sites appropriate? and consistent with the requirements of national planning policy?**

PPW11 stresses the need for Planning authorities to support the provision of sufficient land to meet the needs of the employment market at both a strategic and local level.

In accordance with PPW, Policy SP11 of the Replacement LDP 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.

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.

To ensure future resilience of the local economy the Council will also encourage 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.

The strategic sites are distinguished from other employment sites on the basis of their physical and locational characteristics, particularly their prominent locations adjacent to areas of countryside, and their proximity to the strategic road network. They represent the greatest assets to the area in terms of their propensity to attract high quality businesses plus investment and therefore generate high levels of jobs in a manner that will contribute to the local and wider economy. Given the sensitive locations of these sites, the requirement for consistently high design and environmental standards within an overall concept framework is a prerequisite for development, including access by means other than the car. This will create a mix of employment opportunities for the local labour force in a high-quality environment, meeting the employment objectives of the LDP. The Strategic Employment Sites (25ha in total) are all being progressed individually by the Council and the Welsh Government. The public ownership of these sites provides greater control as to when and how the sites are brought forward.

In addition to the Strategic Employment Sites, the plan also identifies a variety of allocated Employment Sites suitable for all types of employment uses of varying size and type. The Employment Sites identified in Policy ENT1 are those that have a realistic prospect of contributing to future employment land supply. They are distributed across the County Borough and will help deliver

the Regeneration and Sustainable Growth Strategy by 'creating Productive and Enterprising Places'.

In order to deliver the 'Town Centre First' approach outlined within PPW and Future Wales, the Council recognises that B1 office uses are best located within the town centres of the County Borough. This reflects the fact that town centres are the most accessible parts of the County Borough and are adapting to become increasingly multi-functional. The allocated Strategic Employment Sites and Employment Sites also provide opportunities for office development, although applicants must demonstrate that other sites within town centres, and the sequential hierarchy detailed in SP12, have been investigated and found to be unsuitable.

**d) What is the Plan's strategy for the distribution of employment land? does it have regard to the requirements of Future Wales – The National Plan and other regeneration initiatives?**

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

The Replacement LDP apportions sustainable growth towards settlements that already benefit from significant services, facilities and employment opportunities and are most conducive to enabling transit orientated development. This approach has been informed by the findings of the Settlement Assessment (SD91) which established a sustainable settlement hierarchy. As such, and based upon the consideration of a comprehensive range of variables, sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly, and regeneration growth towards Porthcawl and Maesteg and the Llynfi Valley.

As can be seen from Policy ENT1, the allocated employment sites are distributed across the County Borough in accordance with the settlement hierarchy and have a realistic prospect of contributing to future employment land supply. Their retention in the Replacement LDP will therefore help deliver the Regeneration and Sustainable Growth Strategy by 'creating Productive and Enterprising Places'. The spatial distribution of employment land is further illustrated in Table 6 of the Replacement LDP (repeated below).

### Spatial Distribution of Housing and Employment, 2018-2033

Settlement	Housing (Units)	%	Vacant Employment Land (Hectares/Jobs)	%
<b>Regeneration Growth Areas</b>				
<b>Maesteg</b> (Main Settlement – Tier 2)	<b>742</b>	<b>9%</b>	<b>3.5 ha</b>	<b>5%</b>
<b>Porthcawl</b> (Main Settlement – Tier 2)	<b>1,056</b>	<b>13%</b>	<b>0 ha</b>	<b>0%</b>
<b>Sustainable Growth Areas</b>				
<b>Bridgend</b> (Primary Key Settlement – Tier 1)	<b>3,489</b>	<b>42%</b>	<b>50.2 ha</b>	<b>70%</b>
<b>Pencoed</b> (Main Settlement – Tier 2)	<b>891</b>	<b>11%</b>	<b>6.4 ha</b>	<b>9%</b>
<b>Pyle, Kenfig Hill and North Cornelly</b> (Main Settlement – Tier 2)	<b>1,106</b>	<b>13%</b>	<b>4.83 ha</b>	<b>6%</b>
<b>Outside Regeneration Growth Areas and Sustainable Growth Areas</b>				
<b>Valleys Gateway</b> (Main Settlement – Tier 3)	<b>686</b>	<b>8%</b>	<b>6.4 ha</b>	<b>9%</b>
<b>Local Settlements</b> (Tier 3)	<b>365</b>	<b>4%</b>	<b>0.4 ha</b>	<b>1%</b>
<b>Total</b>	<b>8,335</b>	<b>100%</b>	<b>71.7 ha / 7,500 jobs</b>	<b>100%</b>

Bridgend continues to be the main area of growth to reflect its status as a sub-regional settlement being a focus for commercial, service and employment development to meet the needs of a wide area beyond the County Borough boundaries. Hence, the proportion of vacant employment land is purposely higher than housing growth in relative terms. There is proportionate alignment in housing and jobs within Pencoed, and, to a slightly lesser extent, Pyle, Kenfig Hill and North Cornelly, although residents of these settlements also benefit from numerous sustainable travel options to access employment in Bridgend and further afield regionally. In Maesteg and the Llynfi Valley, employment development is proportionately aligned with residential development to help provide a sustainable and realistic level of growth. The imbalance in Porthcawl is acknowledged, although it is likely that the majority of employment in the town will continue to be provided through planned growth in the commercial, leisure and tourism sectors. Outside of the Growth Areas, the Valleys Gateway will be

maintained as an important employment location, which serves its hinterlands in addition to the Ogmore and Garw Valleys. However, transport capacity issues currently preclude additional significant development within this area at present.

Future Wales identifies Bridgend as a key settlement and highlights the potential and opportunity for Bridgend to function as a key employment hub, capitalising on its strategically important location on the South East Metro System. Bridgend's economy is closely linked to the manufacturing sector, although it has a diverse economy with employment across a range of activities including emerging sectors such as 'life sciences'. Growth in large sectors such as warehousing/retail, professional/private services and construction has increased more rapidly in Bridgend than the national benchmarks, rendering the County Borough a significant generator of GVA, locally, regionally and nationally. In this context, the LDP will provide the framework for the County Borough to both contribute towards and capitalise on the success of Cardiff City Deal plus the interdependencies of the Swansea Bay Region.

- e) Are all the sites allocated in Policies SP11 and ENT1 intended to be developed for B1, B2 and B8 purposes? if not should the policies be amended to make clear the intended / potential use?**

Yes, the intended use of the sites allocated in Policies SP11 and ENT1 is for B1, B2 and B8 employment purposes. The Council is of the view that this is clearly stated in the Policy and does not need amending.

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.

- f) Does Policy ENT3 provide an appropriate framework for the development of employment proposals on non-allocated sites? Is it flexible enough to adapt to changing circumstances?**

Policy ENT3 provides a framework for the determination of non-B uses on **allocated** sites.

Whilst the Council considers that the sites allocated in Policies ENT1 and ENT2 provide a balanced portfolio of sites capable of meeting the requirements of a wide range of employment proposals, it also acknowledges that certain employment uses may be promoted on sites that are not allocated by these policies. In such circumstances, and in order to deliver the 'Town Centre First'

approach outlined within PPW and Future Wales, the Replacement LDP prioritises town centres as multi-functional focal points for communities. The Plan seeks to direct facilities and services to town centres in the first instance, to capitalise on their health and vibrancy, whilst ensuring intended users can easily walk, cycle and/or use public transport to access them. Therefore, applicants must demonstrate that other sites within town centres, and the sequential hierarchy detailed in SP12, have been investigated and found to be unsuitable.

In addition, Criteria 4 of Policy SP11 allows for the development of small-scale sustainable employment developments within local service settlements. Such proposals will fall to be determined against other policies within the LDP.

**g) Should details of the strategic and non-strategic employment sites be included in the Implementation and Delivery Appendix?**

Agreed. BCBC propose to include the details of the strategic and non-strategic employment sites (i.e. those sites included in Policy ENT1) in the Implementation and Delivery Appendix. Please refer to SD27.

**6. Does Policy ENT4 provide an appropriate framework for the management of employment sites in rural areas?**

Policy ENT4 accords with the requirement of PPW and TAN 24 in providing a criteria-based policy to assess often unexpected requests for additional employment land, outside of allocations, in rural areas. The criteria are framed whereby the advantages of a new application can be considered. The criteria afford positive weight to new applications for 'expansion' or very local re-location of firms who have operated within the settlement for at least 3 years. Employment uses in and adjoining an existing settlement boundary must be compatible to the location and neighbouring uses. Employment uses beyond the existing settlement must demonstrate that the nature of the business necessitates a rural location and mitigates against any harmful impacts on local amenity.

In instances where a countryside location is not considered acceptable for a proposed enterprise, developers should consider existing employment areas on the outer edge of the urban area, as in many instances such sites could reasonably serve the rural area. This recognises the strong interdependence between the urban and rural areas of the County Borough.

**7. Does Policy ENT5 provide an appropriate framework for the management of development at the Former Ford Site, Bridgend? and should it be included in Policies SP11 and ENT1?**

In the case of the former Ford plant, the Council believes that a unique approach is required to enable redevelopment of the site and Policy ENT5 is necessary to

enable a flexible mix of economic uses, not necessarily akin to the type and density of uses previously accommodated on the site.

Prior to its closure in 2020, the site employed 1,700 highly skilled workers and was a key, safeguarded employment allocation within the County Borough. Whilst the revised demographic work, employment data and forecasts within the employment evidence base reflect the most recent trend-based data available to inform the Plan, the trends and datasets predate the very recent closure of the former Ford Manufacturing Plant. The resulting demographic and labour supply changes will eventually be captured by future projections and forecasts, although the most recent iterations still assume that 1,700 people are employed on the Ford site. It will take time for the full labour supply impact of this closure to be understood, especially given that the pandemic is likely to temporarily limit labour mobility and the ability for other firms to take-up any labour released by Ford.

The EEBS Update (2021, SD70) highlights the need to quickly turn this economic blow into an economic opportunity. This can be achieved by offering business space to existing and new businesses, whilst seeking new options to retain the recently released, yet highly skilled workforce in the local area. In order to meet these aims, enable re-development of the former Ford Manufacturing Plant site and provide additional flexibility to the employment land supply, the EEBS Update recommends considering the site as a new development opportunity. Several options are presented in this respect, including re-using or re-configuring parts of the site, 'meanwhile employment use' pending a longer-term re-development strategy and/or a more holistic development opportunity. Ultimately, the EEBS Update concludes that the site has scope to make a much larger economic impact (in terms of jobs supported) as a new development opportunity than the previous use did. 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.

It is acknowledged that re-development of the site will be a challenge and extensive enabling work will be required to bring the site forward in partnership with key stakeholders. This will simultaneously provide a greater degree of flexibility and choice to the employment land supply. The exact nature, type and mix of uses will be subject to refinement through future Supplementary Planning Guidance (SPG), although the re-development of the site will be primarily driven through economic use(s). A flexible approach will be necessary to this end, acknowledging that a mixed-use development may be required to maximise this economic opportunity which could include a minority of residential uses for purposes of cross-subsidisation, which would not otherwise be acceptable on other Employment Sites. Policy ENT5 is considered to provide an appropriate framework to enable re-development of the site and is framed in the context of SP11. Given the uniqueness of the opportunity, it is considered necessary to separate the site from the exclusively B space new employment land allocations within ENT1.

This is considered to provide the most appropriate planning framework for the Council to work collaboratively with Welsh Government and the landowners to secure the best outcome for Bridgend.

## **8. How will the Plan maintain and enhance the County Borough's tourism, culture and leisure offer?**

The LDP provides the framework for the provision and protection of well-located, good quality, tourism, sport, recreation and leisure facilities and aims to diversify tourism in the County, thereby contributing to the Aims and Priorities of the Bridgend County Destination Management Plan (2018-2022) (SD 59).

The Destination Management Plan is a statement of intent to manage the County Borough in the interests of tourism, taking account of the needs of visitors, local residents, businesses and the environment. It is a systematic and holistic approach to making Bridgend County Borough work as a visitor destination. It embraces the idea of sustainability, focusing on tourism which brings economic benefit, whilst setting out the ways in which different stakeholders may work together to achieve a positive impact.

Tourism has the potential to increase economic activity, assist regeneration and conservation, and raise general health and well-being. Policy SP16 of the Replacement LDP seeks to ensure that proposals for new tourism related development are located in sustainable and accessible locations and that local communities are not adversely affected. In particular, and in accordance with the Destination Management Plan, SP16 acknowledges the strategically important tourist resort of Porthcawl, in addition to recognising the regenerative benefits appropriate tourism development can bring to Maesteg and the Llynfi Valley.

Tourism has the potential to increase economic activity, assist regeneration and conservation, and raise general health and well-being. There can also be some negative impacts of tourism, as a result of visitor pressure, in terms of traffic congestion, harm to sensitive natural environments (for example in undeveloped coastal areas and protected areas), and to local communities. To help assess development proposals and to ensure positive impacts are maximised whilst negative impacts are reduced, Policy SP16 requires planning applications to be supported by a Tourism Needs and Development Impact Assessment.

Policy SP16 is supported by Policies ENT17 and ENT18. ENT17 contains criteria against which tourism proposals in the countryside will be assessed with an emphasis on encouraging those developments that demonstrate linkages to cultural, sport and leisure opportunities. ENT18 provides the Council with an element of control over the proposed change of use of existing tourist accommodation. Whilst acknowledging that the LDP does not seek to perpetuate outdated accommodation that could be put to more beneficial use, the policy

recognises that the availability of a wide range of tourist accommodation benefits the economy and gives choice to visitors (as promoted by TAN13).

## ***Infrastructure***

### **9. Does Policy SP10 provide an appropriate mechanism for securing new infrastructure? is it based on robust and credible evidence and consistent with national planning policy?**

Policy SP10 provides the overarching policy framework for securing the infrastructural requirements needed to support development proposals and ensure any harmful effects of development are mitigated.

Policy SP10 is supported by and has been informed by the Infrastructure Delivery Plan (IDP 2022, SD77). The IDP has been prepared in accordance with PPW and the WG LDP Manual and provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. All infrastructure measures identified in the schedule are required in order to either unlock the development or are policy requirements necessary in order to meet fundamental LDP objectives, particularly those relating to sustainability and placemaking.

Throughout the LDP process discussions, workshops and meetings have taken place with a variety of infrastructure providers, agencies and other key stakeholders, both within the Council and external organisations, in order to ensure a comprehensive understanding of what is needed is shared between all parties. The exchange of information flowing from this collaborative approach has enabled infrastructure providers to think more strategically in terms of future provision and the challenges brought about by significant growth in the long term. It has also enabled identification of requirements needed in the shorter term to safely deliver the level of growth identified in the LDP.

The Bridgend Public Service Board has acted as a platform to meet the 5 Ways of working stipulated by the Well-Being of Future Generations Act (Wales) 2015. This requires consideration of involvement, collaboration, integration, prevention and long-term balancing factors in the decision-making process, all of which have formed an intrinsic part of the LDP's development. The inter-relationship that has developed through the preparation of the IDP has enabled the following:

- Engagement with statutory consultation bodies responsible for the provision of public utility infrastructure as early as possible to help shape future locations for development;
- Understanding of the capacity of the existing infrastructure network;
- Explanation of where improvements to the network are going to be made and the capacity increase they will bring;

- Knowledge of the timing of improvements, linked to a funding programme;
- Identified the interrelationship between capacity increases and future growth; and
- Understanding of the need to fund any shortfall/deficiencies in infrastructure provision in advance of future funding programmes and factor this into the financial viability modelling of development.

In addition to consultation with stakeholders, the IDP is also underpinned by the various technical evidence base documents that have been submitted as part of the Deposit LDP. Together these provide a complete picture of infrastructure provision in the area, known constraints and future requirements needed to ensure that the LDP allocations are sustainably delivered. These include, but are not limited to:

- SD38 Background Paper 5: Affordable Housing
- SD53 Background Paper 21: Education Capacity
- SD56 Background Paper 24: Strategic Transport Assessment
- SD62 Bridgend Strategic Flood Consequences Assessment (2020)
- SD63 Bridgend Strategic Flood Consequences Assessment Update (2022)
- SD66 Cwm Taf Morgannwg University Health Board (CTMUHB) Response to the Replacement Local Development Plan
- SD79 Local Housing Market Assessment (2021)
- SD80 Outdoor Sport and Children's Play Space Audit (2021)
- SD81 Plan-Wide Viability Assessment (2021)
- SD82 Potential Strategic Sites Independent Financial Viability Appraisals Report (2021)
- SD83 Updated Financial Viability Appraisals Addendum - Strategic Sites (2022)
- SD95 Strategic Transport Assessment (2022)

In addition, PPW requires that all sites submitted for inclusion in a LDP are supported by a suite of evidenced based technical studies demonstrating their deliverability. Through the Candidate Site assessment process, BCBC has worked closely with site promoters to ensure all sites considered to be in accordance with the LDP strategy are supported in such a manner. This has required promoters to consult with various stakeholders to shape the proposals for their submissions, and to ensure that the provision of adequate infrastructure has been embedded in the candidate site submission. Examples of where this has been used to inform the development of the IDP include the following:

- Independent Financial Viability Appraisals (IFVA) (Please refer to SD82 & 83): From the outset of the Candidate Site process, the Council has made site promoters aware of the need to provide a viability assessment as part of the evidence-based justification for the allocation of their site. All proposed allocations are supported by independent, site-specific viability assessments using the Burrows-Hutchinson Ltd Development Viability

Model; an approach endorsed collectively by Welsh Government, the South East Wales Region and South West Wales Region. Strategic site promoters commissioned Burrows-Hutchinson Ltd to undertake such appraisals on their behalf. The Appraisals provide theoretical assumptions on the level of infrastructure required and associated phasing and costings. These have been agreed with site promoters, independently verified, and, where relevant, have been used to inform the IDP Schedule.

- Advanced masterplanning / planning applications: A number of the sites allocated in the LDP are at an advanced stage of masterplanning with a view to being the subject of future planning applications. In these instances, information from technical studies submitted as part of the Candidate Site process have been used to inform the IDP Schedule where appropriate. There are also sites within the existing housing land supply that have planning consent but have yet to be developed. Where these will supply vital infrastructure to support the development consented, they have been added to the IDP schedule.

#### **10. Will Policies SP9 and COM9 provide an effective framework for the protection of existing, and delivery of future, community facilities?**

Policies SP9 and COM9 recognise and safeguard the role of community facilities.

Policy SP9 seeks to retain or enhance facilities to ensure no section of the community is excluded from having access to basic services, with the overall aim of creating sustainable and inclusive communities. PPW emphasises the planning system's role in providing a framework for well-located, good quality sport, recreational and leisure facilities. Development Management Policies COM9-13, therefore clearly outline the Plan's policy requirements for the provision, protection and enhancement of sport, recreation and leisure facilities. These are key to facilitating well-being of children and adults alike, and for the social, environmental, cultural and economic life of the County Borough's communities.

For the purposes of the LDP a 'community building', as referred to in SP9, is defined as a facility used by local communities for leisure and social purposes, often on a non-profit basis. Wherever possible, such buildings should have a dual purpose and incorporate necessary ancillary commercial elements in order to make them sustainable in the longer term. The co-location of multiple uses in close proximity or in one building is important in providing a range of activities to meet the communities' diverse needs. Co-location provides the opportunity for sustainable linked activities and has potential to create a greater sense of ownership and community. Therefore, the Council will, wherever practicable, seek to combine social and community uses in one location or a single building. An opportunity exists to realise this with respect to the Council's aspirations for community focussed schools as part of the School Modernisation Programme.

It is recognised that opportunities for new social and community facilities may often be limited, especially where these are not commercially funded but subsidised by the Council; therefore the LDP sets out a basic principle of retaining existing facilities where these provide a vital and sustainable role within their communities. Policy SP10 also seeks to provide new facilities where they are needed and justified

Policy COM9 aims to protect all existing and proposed social and community facilities that provide a valuable role in their communities. Development that would result in the loss of such facilities and would have an adverse impact on the community within which they are intended to serve will not be permitted unless the policy criteria are met.

When locating new or replacement facilities, the Council and other partner organisations will play a vital role in supporting and developing the model of provision. An innovative and joined-up approach to service delivery will be prioritised, especially through the co-location of social and community facilities.

#### **11. Does the Plan provide a clear and consistent framework for securing planning obligations? and how will competing priorities would be managed?**

The Council firmly believes that the policies within the Plan provide a consistent framework (and importantly are sufficient flexible) to secure planning obligations and deliver the infrastructural requirements of development in accordance with the policy tests set out in National Policy.

It is important to stress that all applications will be assessed on a case-by-case basis and managed through the Development Management process. The LDP stresses the importance of developers engaging the Council in pre-application guidance to facilitate discussions on planning obligations.

In the case of Strategic Sites, the starting point for assessing applications will be thematic policies PLA1-5. These policies contain development requirements which each site must provide by means of appropriate planning conditions or obligations. These requirements have informed the independent financial viability assessments that have been undertaken for each site. This approach ensures that all stakeholders with an interest in the LDP are aware of the headline infrastructural requirements that each of the sites need to deliver to be considered in accordance with the Plan.

The remaining Housing Allocations contained in Policy COM1 have also been subject to viability appraisals and infrastructural assessments to ensure that they are deliverable and capable of providing the level of supporting infrastructure required. Planning obligations will be used to secure affordable housing, education contributions, open space and highway infrastructure in accordance with Policy SP10.

Development proposals on sites outside of those allocated will be assessed against the various policies of the Plan to determine their ability to contribute to the Regeneration and Growth Strategy. If deemed to be in accordance, the infrastructural requirements will be assessed against the relevant policies and the various Supplementary Planning Guidance (SPGs) documents.

The SPG documents will supplement the Replacement LDP, including through a specific Planning Obligations SPG. This will set out the Council's approach to planning obligations when considering applications and provide 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. Existing SPGs regarding the provision of affordable housing, education facilities and open space will be updated, revised and subject to further consultation.

All competing priorities have therefore been assessed and considered as part of each proposed allocation's detailed site-specific evidence base. Given the extent of frontloading, deviation from Replacement LDP's requirements should not be necessary and will only be acceptable in exceptional circumstances if it can be robustly demonstrated that site-specific constraints, abnormal costs and/or other viability challenges necessitate otherwise. The Council will require robust supporting evidence in these instances and will work collaboratively with developers using the Development Viability Model; the approach endorsed by the South East and South West Wales Regions. In this regard the Planning Obligations SPG will also set out clear guidelines regarding the use of viability appraisals.

Ultimately, decisions regarding competing priorities will be taken by members of the Development Control Committee. This will be informed by an assessment of a development proposal's merit measured against all policies within the LDP, the outcome of viability negotiations and consultation with the service areas of the Council.