

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

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 9: Good Design and Sustainable Placemaking – Strategic Allocation at Land South of Bridgend (Island Farm) (Policies PLA2 and SP2(2)) and Housing Allocations at Parc Afon, Ewenny (Policy COM1(1)) and Craig y Parcau, Bridgend (Policy COM1(2))

Issue – Is the allocated Strategic Development Site and housing sites are soundly based and capable of delivering new residential and community development over the Plan period?

Policies PLA2 and SP2(2): Land South of Bridgend (Island Farm)

a) What is the current use of the Strategic Development Site (SDS)?

The site comprises approximately 50 hectares and consists of tree and scrub land to the north, arable farmland to the south and east and grazing land to the northeast. The northern woodland section forms part of the Island Farm POW Camp SINC, designated for a mosaic of habitats and the presence of hazel dormice. The SINC includes the land immediately to the south of the A48 which formed part of the former Second World War prisoner of war camp. A single storey building has been listed (Grade II) and remains as the only surviving building from the camp (Hut 9).

The site was allocated within the existing LDP as a Strategic Employment Site (11ha) and a mixed-use development comprising sport, leisure, commercial and office uses was granted outline planning permission on 14th March 2012. The permission was subject to a Section 106 Agreement that controlled highway works, land dedication, management plans, contributions and matters relating to travel plans associated with the stadia development. A series of reserved matters consents were granted for an indoor tennis centre, landscaping and ecological works, and highway and drainage infrastructure. The Outline permission included the standard time limit conditions for the submission of reserved matters and the commencement of development. The final approval of reserved matters was issued on 12th June 2015, and enabling works commenced in July 2017.

b) What is the proposed use of the SDS?

Land South of Bridgend is allocated for a comprehensive green infrastructure led residential development. The site will deliver circa 788 homes during the Plan period (including 20% / 158 affordable housing units), incorporating a new one form entry primary school with co-located nursery, the re-location of Heronsbridge Special

School, leisure facilities, recreation facilities, public open space, plus appropriate community facilities and ancillary commercial uses.

c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

The constraints affecting the site are detailed within the Implementation and Delivery Appendix to the Replacement LDP, together with the Infrastructure Delivery Plan (SD77, 2022). However, none are considered significant obstacles to development within the Plan period due to suitable mitigation measures having been identified. The site's supporting evidence has taken all constraints into account to demonstrate the site is both deliverable and viable. The main constraints are summarised below for ease of reference:

Transport Mitigation

The site-specific Transport Assessment (see SD131 and SD132) identified how the traffic from the development proposals is expected to be distributed across the surrounding highway network, and how the traffic flows compare to those predicted from the previously consented Island Farm proposals. The assessment identified that with the exception of the proposed A48 site access junction, the Ewenny Road Roundabout in the AM peak hour and the B4265/Ewenny Road Junction in both peak hours, development will result in lower traffic flows through all junctions across the assessment network over the AM and PM peak hour periods, compared to the previous consented development proposals on the Island Farm Site.

The increase in flows at the B4265/Ewenny Road junction is due to the proposed access junction to serve a proposed indoor Tennis Centre. This junction will not serve the proposed residential site. The traffic impact of the Tennis Centre scheme has been assessed and considered as part of a planning application that was granted consent in November 2022. Previous assessment work on the consented scheme identified that the Broadlands Roundabout, Ewenny Roundabout, and Picton Close Junction all show capacity issues both including and excluding the consented Island Farm proposals traffic. Although the revised Island Farm proposals in general bring traffic reductions across these junctions (from what was previously consented), with consideration of background traffic growth alone, these junctions will still likely require mitigation to operate within capacity during forecast years. Such mitigation measures that were outlined for these junctions, as referenced within the consented scheme would enable the junctions to provide nil detriment or better in terms of the revised scheme.

The Strategic Transport Assessment (SD95) considered the collective impact of the proposed allocations. As summarised in Background Paper 24: Strategic Transport Assessment (SD56), appropriate mitigation is possible via a s106 contribution and

s278 Highway works to enhance the strategic highway network. For Land South of Bridgend, this will include a significant junction improvement scheme at Ewenny Roundabout (A48 Bypass Road/B4265 junction) as well as signal enhancements to the A483 Cowbridge Road/B4265 Ewenny Road/A473 Langenau Strasse/Nolton Street junction, the A473/A48 Roundabout and the A473 Waterton Road/Brocastle Avenue/A473 Waterton Road/B4181 Coychurch Road junction. Estimated costs of these mitigation measures have been considered as part of the site-specific viability appraisal for Land South of Bridgend, ensuring all transport related constraints can be overcome to enable the development to come forward.

Ecology

The masterplan for the site has been informed by an ecology report prepared by Ethos Environmental Planning (See SD123). This identifies a number of ecological constraints, appropriate mitigation measures to address them and recommendations regarding further survey work to support a planning submission.

The site has an extensive planning history which has demonstrated that the site can be developed in an ecologically sensitive way through careful scheme design and the use of mitigation measures. As part of the existing consent, a mitigation strategy was produced in 2009 to offset the impacts of the development. It was proposed that the SINC and southwest field would become a wildlife conservation area within the new development. Surveys at the site found dormice to be present, both within the woodland and scrub in the SINC and in the hedgerows of the agricultural fields. These areas are also known to be used by bats for foraging and commuting purposes, and the SINC area contains a roost site for lesser horseshoe bats and brown long-eared bats.

As part of the development process some areas of these habitats were to be lost, and modification to the remaining areas due to the impacts of the development, including noise and light spillage. Part of the mitigation strategy to counter these losses included the creation of new habitats suitable for the relevant species. As such, habitat design was guided by the requirements of the protected species which had the potential to utilise the site. In addition to dormice and bats, a further condition of the existing consent required the habitat requirements of Great Crested Newts to be taken into account.

A number of the identified measures have been implemented including:

- **Tree and Scrub Planting:** translocation and planting new trees and scrub in the south-west field, providing an alternative for displaced animals, including dormice, bats, and shelter for reptiles and amphibians.
- **Hedgerow Enhancement:** enhancement and translocation of hedgerows from the centre of the site to the eastern site boundary has been undertaken, to

create continuous hedge lines which help to buffer the expanded SINC site, and to filter out noise and light from development. Additionally, it provides a continuous flight line for bats and allow dormice to disperse more easily along the hedgerows.

- **Bat Roost Building:** a purpose-built bat roost building has been constructed within the south-west field, providing a suitable roost site for both lesser horseshoe and brown long eared bats, which have both been found roosting in the old hut within the SINC. The building was constructed on the lesser horseshoe key flight line to enable them to rapidly locate it, and also be close to good feeding habitats on the Merthyr Mawr and the River Ogmere.
- **Dormouse Nest Boxes:** dormouse nest boxes placed within the field, to provide shelter for dormice that are to be displaced from other areas of the site. Placed within the north-east and south-east hedgerows, at approximately 10m interval.
- **Pond creation:** two new ponds have been created within the south-west field, with the primary aim of providing habitat for Great Crested Newts.
- **Grassland Creation:** rough grassland created around the pond to mitigate loss of existing grassland.

The masterplan for the site has been informed by an ecology report prepared by Ethos Environmental Planning (See SD123). This identifies a number of ecological constraints, appropriate mitigation measures to address them and recommendations regarding further survey work to support a planning submission.

The report notes that the site is comprised predominately of arable land with very few plant species present. The field margins provide good habitat for a range of species and buffer the existing hedgerows, which ranged from mature hedgerows with trees and hazel coppice, to intensively managed species-poor hedgerows. The two hedgerows translocated to the eastern boundary had been appeared to show new growth. A number of sink holes were also noted across the site. These ranged from those which had apparently been present for a long period of time and had mature trees growing within them, to those very recently emerging and comprising of small areas of collapsed earth.

In addition to the findings of previous ecological surveys, the report also considered the presence of hedgerows, woodland and arable land within the site to provide suitable habitats for dormice, badgers, riparian mammals and farmland, ground nesting and breeding birds. Further surveys will be required to inform a detailed planning application. The two new wildlife ponds created in the southwest of the site could also provide suitable breeding habitat for amphibians, requiring a Habitat Suitability Index of each of the ponds within 500m of the site to be undertaken to inform a detailed planning application. The masterplan indicates the retention and protection of these ponds.

With regards to bats, previous surveys identified roosting lesser horseshoe and brown long-eared bats within Hut 9 in the woodland within the SINC. Since the previous surveys were undertaken, a dedicated bat roost has been created in the south-west of the main site. The habitat within the site contains woodland and hedgerows, offering potential commuting, foraging and roosting habitats for bats. A number of mature trees were also noted which could have potential roosting features for bats.

In addition to the Ecological Survey, a SINC review (2020, SD93) was undertaken by the Wildlife Trust and indicates that the on-site SINC has not changed significantly since a previous survey carried out in 2011 and should therefore be retained. The small section of woodland in the field to the south-east is worth removing from the citation as it is isolated and does not appear to add to the site's value. The woodland varies in quality but appears to offer habitat for dormice and bats and there are numerous woodland indicator species. The grassland is not particularly species-rich but adds to the site as a whole. The masterplan shows the retention of the SINC, with the exception of the access road.

The masterplanning (SD127) for the site has been significantly guided by a green infrastructure strategy which responds to the ecological constraints and opportunities which have been identified within the site. In total over 24 ha is proposed for blue and green infrastructure, ecological enhancement and public open space. The existing hedgerows have been retained. They have been allowed for within the public realm, rather than to rear gardens, thus helping to create a mature landscape setting. The hedgerows create green movement corridors within the site for people and wildlife. They can also, through the introduction of swales, form part of the sites sustainable urban drainage system. As per the development concept, the existing sink hole areas have also been retained, which will be within the public realm so that they can contribute to the setting of the development. The development of the site also offers the opportunity to establish green links by providing a multi-functional green lung between the site and Bridgend town centre (via Newbridge Fields). The western boundary also has potential for establishing green links.

NRW support the commitment for the future development of the site to follow a high-quality Green Infrastructure led approach so that the mixture of uses will be fully integrated and designed around the SINC.

Archaeology & Heritage

The site is located within the 'Merthyr Mawr Farmland, Warren and Coastline' which runs north-eastwards up from the coast to the southwestern fringe of Bridgend. Much of the wider landscape is designated as of Outstanding Historic Importance and all of the coastal area lies within the Glamorgan Heritage Coast. Policy PLA2

stresses the importance of protecting the nationally important archaeological and cultural heritage of the landscape as an integral part of the wider Landscape of Outstanding Historic Importance, including prehistoric and medieval remains, the dunes' ancient, buried archaeology and the Grade II* Merthyr Mawr Estate. In particular, the southern boundary of the site is important as it lies adjacent to an historic landscape as identified by the Landscape Character Assessment (SD78).

Policy PLA2 will ensure the design and layout of the site has regard to the surrounding landscape, with appropriate mitigation measures and landscaping treatments in order to minimise visual impacts on adjacent uses. It should also be noted that the proposed mixed-use development will result in significantly reduced building heights and a reduced feeling of massing when compared to the previously permitted sports village scheme. A detailed, updated Landscape and Visual Impact Assessment will be required to inform and accompany further masterplanning work (as part of a future planning application). This more detailed assessment will include finer details relating to roofscapes and landscaping. Elements of the existing planning consent will be incorporated into new proposals for the use of the site, and development will take into account known biodiversity interests and the listed building, ensuring the design and layout is sensitive to these factors. Specifically, the development will protect and incorporate both the SINC and Hut 9 (former prisoner of war camp) within the site layout.

Agricultural Land Classification

The Predictive Agricultural Land Classification Maps show the Island Farm site as containing a mix of Grade 2 and 3a land which is recognised as being the Best and Most Versatile (BMV) agricultural land in PPW. However, the BMV land already forms part of extant planning consents as detailed further within the BMV Agricultural Land Background Paper (SD48) and summarised below:

The outline permission for a mixed-use development included approval for the construction of a new traffic light-controlled junction on the A48 that would serve as the primary access to the development site. The road would however pass through the Island Farm POW SINC. Under the Conservation and Habitats and Species Regulation 2010, a conditional European Protected Species Licence was issued. In order to comply with the licence and to prevent the new access road from fragmenting the dormice population, the developer proposed to construct and plant the approved 'Green Bridge'. Access to the site could not be formed from the A48 until the Green Bridge had been established. Under a non-material amendment, the Council consented a temporary construction access from Ewenny Road/New Inn Road to allow a sequence of 'enabling works' that had already been approved. These are described as:

- The setting up of the site facilities via Island Farm Lane and New Inn Road to provide temporary internal roads for the delivery of earth moving plant to the site;
- Undertaking earthworks to form a plateau for the Tennis Centre;
- Undertaking the earthworks, drainage works and forming the sub-base to the internal access road working from the boundary adjacent to the interconnecting spur with the adjacent Technology Drive; and
- Break through the boundary hedgerow and construct the proposed road link between the Island Farm site access road and Technology Drive. Install the incoming services infrastructure that will access the site via Island Farm Lane. Construction access herein to be via Technology Drive;

The aforementioned works were commenced in July 2017 and in accordance with the definitions within the s106 Agreement, constituted a 'commencement of development' triggering a number of obligations in relation to highway works. A deed of variation to the original agreement was signed on 11th October 2018 which reconciled the enabling works with the original obligation. On the basis of the above, the 'enabling works' constituted a material operation and a lawful commencement of reserved matters consents. The permissions are therefore considered to be extant. Hence, re-allocation of this site as a mixed-use scheme (including residential) within the Replacement LDP would not result in the loss of any additional BMV agricultural land to that included within the extant consent.

Moreover, re-allocation of this site will enable delivery of sustainable growth enshrined in placemaking principles, deliver affordable housing in the highest need part of the County Borough and enable delivery of two schools on the site. It will also enrich active travel and green infrastructure networks within Bridgend through creation of a 'green lung' that will connect the site to the Town Centre via Newbridge Fields. On this basis, there is considered to be an overriding need for the development. As part of their Deposit Consultation representation, Welsh Government confirmed, "the Council has demonstrated a pragmatic approach to considering BMV loss in the context of national planning policy and on that basis, **no objection** is offered" (original emphasis).

Education Capacity

The development will generate additional school places and could place strain on catchment schools, which may be at capacity at the time of application. The development will therefore meet the needs for the additional school places it generates through on-site provision and financial contributions. The development must provide 1.3 hectares of land to accommodate a minimum one form entry primary schools with co-located nursery facilities and an additional buffer of 0.5ha for future expansion. Financial contributions must also be made to nursery and

primary provision as required by the Local Education Authority, secured through s106 in accordance with the Education Facilities and Residential Development SPG. The development must also provide 4ha of land to facilitate the relocation of Heronsbridge Special Education Needs School.

These requirements are specified within Thematic Policy PLA2, and contributions have been considered as part of the site's independent viability appraisal to certify deliverability.

Utilities

Investment in utility infrastructure will ensure that the site can accommodate the level of development proposed. Given the site's location, in close proximity to existing built form, it is considered that appropriate water, gas and other utility connections can be made to the site.

A utility search for the Island Farm site indicates the presence of overhead HV (33kV) pylons, as well as, buried HV (11kV) services. These services cross the site as part of the wider WPD network. Consideration has been given in the formulation of the supporting Masterplan as to how the site can be sensitively developed with the overhead pylons remaining in situ.

For future electricity supply, the development will need to fund connections, diversions and a new WPD HV (11kV) ring main to serve the site with new substations to serve the dwellings (7 in total), the Primary School (1) and the Special Educational Needs (SEN) Facility (1). Connections will also need to be made to the gas network and connections/diversions will need to be made to enable broadband provision.

Welsh Water have advised that the wastewater treatment plant has sufficient capacity to accommodate the envisaged foul flows from the proposed development, although additional hydraulic modelling will be required to advise on foul and water supply network capacity and potential connection points. Given the maximum potential size of the development, local infrastructure improvements to the Welsh Water network are likely to be required. This will be informed by the HMA and will form part of a future planning submission.

These requirements have been factored into the Infrastructure Delivery Plan (SD77, 2022). National Grid and Welsh Water consider there to be no major constraints regarding the capability of the electricity and gas transmission systems and water and sewerage infrastructure to accommodate the development (refer to respective Statements of Common Ground, SD100 and SD101).

d) In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?

Yes, the site has been subject to rigorous independent viability testing, at a level of detail that is both meaningful and proportionate to the site's significance in the Replacement LDP. The site promoter commissioned Burrows-Hutchinson Ltd to undertake Independent Financial Viability Appraisals using the Development Viability Model; an approach endorsed collectively by Welsh Government, the South East Wales Region and South West Wales Region.

An initial site-specific appraisal was undertaken in 2021, which established the site could meet the proposed Replacement LDP policy requirements in full, while delivering a competitive, market risk adjusted return to the developer and a land value that is sufficient to encourage a landowner to sell for the proposed use. This appraisal was later refreshed in 2022 to consider changes in affordable housing transfer values, market values and construction costs since the original appraisal, plus details from the latest concept masterplans and recommendations from the Strategic Transport Assessment (SD95, 2022). This later appraisal reaffirmed the site's viability based on the latest evidence, coupled with realistic and reasonable assumptions concerning costs and values. Both appraisals were undertaken in accordance with the preferred approach set out in Welsh Government's Development Plans Manual (Edition 3), after appropriate consultation on key issues and principles with the site promoter.

The appraisals evidence the site's ability to deliver 20% affordable housing in accordance with the need identified in the LHMA, a 1-form entry primary school to meet identified education needs, strategic highway improvements in response to the Strategic Transport Assessment and recreational facilities in accordance with the Replacement LDP policy framework. The appraisals have also demonstrated the site is capable of funding enhanced active travel linkages with the wider Bridgend settlement, a key requirement to provide safe active travel linkages between the site and Bridgend town centre.

This evidence demonstrates the site is financially viable to develop and there are considered to be no impediments to delivery, having full regard to site-specific constraints and the need to provide affordable housing. Refer to the Potential Strategic Sites Independent Financial Viability Appraisals Report (2021) and Updated Financial Viability Appraisals Addendum – Strategic Sites (2022).

e) Are the number of residential units proposed realistic and deliverable over the plan period?

Yes, the site is supported by a proposed illustrative masterplan and proving layout (SD127), which were informed by a density level considered to respond most

appropriately to the site-specific context. The masterplan has been refined to enable development parcels or areas to be quantified using a density that engenders character and a clear street hierarchy, including areas of lower (35-40dph), medium (45-50 dph) and higher (55-60dph) densities. This has enabled an accurate calculation of the overall anticipated housing numbers, which has been benchmarked against recent, comparable strategic housing-led mixed-use developments within the region. The development will consist of a range of multi-tenure dwellings and will be developed at an average density of 45 dwellings per hectare, considered appropriate to enable a population suitable of supporting a sustainable mix of uses contained within a neighbourhood. Refer to SD126 Masterplan Report and SD127 Masterplan.

The number of residential units proposed is also considered deliverable and 788 dwellings are expected to be delivered within the plan period. The housing trajectory rate has been informed by site-specific evidence on deliverability, viability and phasing analysis in consultation with the site promoter and Housing Trajectory Stakeholder Group. At the most recent Housing Trajectory Stakeholder Group (held on 27/05/2022), there were no outstanding matters of disagreement on the timing and phasing of sites in the plan period. Equally, all strategic site promoters are party to a Statement of Common Ground (SD241, dated 20/12/2022) that confirms all signatories unanimously support the RLDP and consider the strategic allocations sustainable, viable and deliverable in accordance with the submitted housing trajectory.

f) How and when will the proposed new educational facilities be delivered?

The new education facilities will be delivered on-site. The developer will be required to provide the land and a financial contribution to the Local Education Authority in accordance with the 2021 Educational Facilities and Residential Development Facilities SPG (or subsequent updates thereof). This has been factored into both the illustrative masterplan and also the site-specific viability appraisals to demonstrate the new facilities are deliverable and have been considered as part of the proposed allocation from the outset. The requirements are specified in PLA2, necessary to render the future development acceptable in principle. The Infrastructure Delivery Plan (IDP, SD77, 2022) also provides a single schedule of all infrastructure necessary to render development acceptable in planning terms, including educational facilities. The allocation will need to deliver appropriate supporting infrastructure, as referenced within the IDP, to enable the quantum of proposed development within the plan period to proceed.

The timescales for delivery of the new school will be specified through a s106 agreement, which will be monitored through dwelling occupation thresholds, to ensure timely delivery in dialogue with the Local Education Authority.

g) What are the mechanisms and timescales for delivering the site?

Thematic Policy PLA2 details the site-specific requirements for Land South of Bridgend, set within the context of SP3. This will enable its implementation, in accordance with the Growth and Spatial Strategy identified within SP1 and Strategic Allocations identified within SP2.

The Implementation and Delivery Appendix also sets out the key issues, constraints, phasing and mitigation measures which are required to deliver the site, from which monitoring indicators and triggers have been derived. It provides an overview of site-specific delivery and implementation issues, including site constraints, necessary mitigation and compensation measures. This informs the site's planning, infrastructure and s106 requirements and will ensure clarity for all parties at planning application stage. A s106 agreement will be utilised to outline specific triggers and thresholds for delivery of all planning obligations on the site.

Delivery of the site has been subject to site-specific phasing analysis (in combination with the site promoter and Housing Trajectory Stakeholder Group) to enable development of the housing trajectory. The site is projected to deliver 68 residential units in 2026/27, with 120 residential units per annum thereafter; a total of 788 residential units in the plan period. Occupation of such units will form the basis for setting appropriate s106 triggers to deliver the necessary planning obligations and infrastructure requirements, which will be monitored by the LPA.

h) Is the allocation of the SDS essential to ensure the soundness of the Plan?

Yes, this Sustainable Urban Extension is essential to deliver an appropriate quantum of sustainable development within the Sustainable Growth Area of Bridgend. It accounts for 9% of the total housing provision and exhibits high placemaking credentials in terms of accessibility, availability of amenities and employment provision in the context of the existing population base and position in the settlement hierarchy. Development of this site will direct growth towards the Primary Key Settlement that exhibits high housing need as identified by the LHMA and will enable delivery of a range of other supporting infrastructure including a new primary school, a replacement special school, recreation facilities, highways and active travel enhancements, including strategic improvements to the Ewenny Roundabout. This site is supported by extensive viability and deliverability evidence and presents a key opportunity for sustainable new development to take place over the plan period to help meet the LDP Vision and Objectives and ensure implementation of the Regeneration and Sustainable Growth Strategy.

Parc Afon, Ewenny (Policy COM1(1))

i) What is the current use of the allocated site?

The site comprises a total of 26.ha, located on the south eastern fringe of Bridgend. The site forms an important gateway to the town centre and is situated between Waterton Industrial Estate to the south east, the former Ford engine plant and the Lidl site to the south and Bridgend Industrial Estate to the north. This site is currently allocated as a Regeneration and Mixed-Use Development site within the existing adopted LDP (PLA3(4) - Parc Afon Ewenni).

The site is brownfield and currently comprises of partially cleared land with some remaining low grade single storey light industrial/ warehouse buildings, which are generally low quality and in a poor condition.

j) What is the proposed use of the allocated site?

The site represents a 'Rollover' allocation from the existing LDP and was proposed to be developed for commercial and residential uses. The site had not come forward hitherto due to complex land ownership issues. However, the site is now wholly within the ownership of the site promoters; South Wales Police, Dovey Estates and Bridgend County Borough Council. In addition, the site is free from any covenants or legal ties which would prevent the land from being developed. As such, this regeneration-led allocation was intended to 'rolled over' within the Replacement LDP, as there had been a substantial change in circumstances to demonstrate delivery in accordance with the Replacement LDP Strategy.

However, as outlined below, the site is at significant risk of flooding, particularly in light of emerging updates to Welsh Government guidance TAN 15 and accompanying Flood Map for Planning (FMfP). Consequently, the site was removed as a residential allocation within the Replacement Plan.

k) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

The major constraint concerns the risk of flooding. This has necessitated removal of the site as a residential allocation within the Replacement LDP. Flood risk has been an important consideration in the selection of sites during the preparation of the Replacement LDP. National Policy emphasises that the "climate emergency is likely to increase the risk of flooding as a result of sea-level rises, increased storminess and more intense rainfall. Flooding as a hazard involves the consideration of the potential consequences of flooding, as well as the likelihood of an event occurring. Planning authorities should adopt a precautionary approach of positive avoidance of development in areas of flooding from the sea or from rivers" (WG, 2021, para 6.6.22). Hence, the LPA initially prepared and published a Strategic Flood Consequences Assessment (SFCA, SD62) in October 2020.

This SFCA provided a desk-based study undertaking a broad assessment of the potential flood risks across Bridgend County from all sources of flooding. An initial site screening was also undertaken for the candidate sites to assist the LPA in developing a Replacement LDP in line with the most recent Welsh Government guidance. This included Technical Advice Note 15 Development, flooding and coastal erosion (TAN15), introduced by Welsh Government in 2004.

Since the release of the initial SFCA, an update for TAN15 was released in October 2021 and was due to come in force on 1st December 2021. However, Welsh Government since suspended the implementation of the new TAN15 until 1st June 2023. One of the key changes is to replace the Development Advice Map (DAM) with the Flood Map for Planning (FMfP), which will be used to trigger different planning actions based on a precautionary assessment of flood risk. Importantly, the FMfP includes for the predicted effects of climate change, whereas the DAM did not. The following sections outline the assessment of flood risks undertaken in light of the TAN 15 update.

Strategic Flood Consequences Assessment (SFCA): October 2020

In October 2020, JBA Consulting prepared a SFCA to inform the Replacement LDP. This SFCA built upon the previous 2010 SFCA. It provided a robust evidence-base to inform development of Replacement LDP policies and land allocation decisions. The SFCA indicated that if the current flood zones are correct, most areas of the site are likely to be suitable for development, with Highly Vulnerable Development excluded for those areas of Zone C2. However, with uncertainty in the accuracy of the DAM it was recommended that any development of this strategic site was to be supported by a detailed site-specific flood modelling and corresponding Flood Consequence Assessment.

Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion: December 2021

Since the release of the initial SFCA in 2020, an update for TAN15 was released in October 2021 and was due to come into force on 1st December 2021. However, Welsh Government suspended the implementation of the new TAN15 until 1st June 2023, with consultation on further amendments being held between January and April 2023. One of the key changes is to replace the DAM with the accompanying FMfP, which will be used to trigger different planning actions based on a precautionary assessment of flood risk. Importantly, the FMfP includes for the predicted effects of climate change, which the DAM did not.

Strategic Flood Consequences Assessment Update: August 2022

In 2022, the LPA commissioned JBA to undertake an updated SFCA, which was developed in accordance with TAN15 and the new FMfP, as well as additional

guidance provided by NRW. Upon assessment of Parc Afon Ewenni against the updated TAN15 and FMfP, it was found that 27.04% and 49.90% of the site was located in Flood Zones 2 and 3 respectively. As such, the site was assessed to be at higher risk of flooding than initially identified and was designated as RAG status of 'Red' within the SFCA update. Given the extensive flood risk it may also be difficult to implement widespread development without increasing flooding elsewhere. Recent modelling of the area in the 0.1% plus climate change annual exceedance probability (AEP) event shows, although most of the western portion of the site is flood free, there are significant areas of flooding across the east of the site. There is significant risk of fluvial flooding at the site with many areas not suitable for development on the basis of the current FMfP. However, the SFCA update indicated that the extents of the FMfP were overestimated, and that it may be possible to develop a reasonable proportion of the site in accordance with TAN15. As such, a Flood Map Challenge was anticipated to show the site and flood risk in better light.

Flood Map Challenge

As a result of the recommendations from the SFCA update, JBA Consulting were commissioned by the LPA to undertake outline additional modelling in the form of a Flood Map Challenge for the Waterton Industrial Estate, particularly focusing on the Parc Afon Ewenni site. The areas that were specifically proposed for challenge included both Flood Zone 2 and 3 of the new TAN 15 FMfP, as well as the high, medium and low Flood Risk Assessment Wales (FRAW) zones relating to flood risk from rivers. To understand the flood risk to the site and inform the Flood Map Challenge, a hydraulic model was used. However, initial outline modelling showed that the site would be unable to overcome the identified flood risks and as such would remain unsuitable for residential development. Consequently, it was agreed that proceeding with further modelling and a formal Flood Map Challenge would no longer be appropriate. No further modelling was undertaken by JBA and a Flood Map Challenge was not submitted. As a result of the assessments outlined above, the site was no longer considered viable and was removed as an allocation within the Replacement Plan.

l) In light of the constraints, and having regard to the need to provide affordable housing, is the allocated site economically viable?

As outlined above, the site has been identified as significantly vulnerable to flood risk. Given the constraints affecting the site the LPA no longer consider the site capable of delivering the units proposed within the plan period and therefore consider it necessary to remove the residential allocation from the Replacement LDP.

m) Are the number of residential units proposed realistic and deliverable over the plan period?

Given the constraints affecting the site the LPA no longer consider the site capable of delivering the units proposed within the plan period and therefore consider it necessary to remove the residential allocation from the Replacement LDP.

n) What are the mechanisms and timescales for delivering the site?

As above, given the constraints affecting the site the LPA no longer consider the site capable of delivering the units proposed within the plan period and therefore consider it necessary to remove the residential allocation from the Replacement LDP.

o) Is the allocation of the site essential to ensure the soundness of the Plan?

No, although Parc Afon Ewenni can no longer contribute to the delivery of the identified housing requirement and has been removed from the housing trajectory as a result, the trajectory contains sufficient flexibility allowance to account for the loss of a site of this scale without impacting upon delivery of the housing requirement (refer to Background Paper 4: Housing Trajectory, SD37). The large flexibility allowance embedded at Deposit Stage ensured the Replacement LDP's housing requirement would remain deliverable in such a scenario.

Additionally, at the latest Bridgend Housing Trajectory Stakeholder Group meeting (refer to Background Paper 4: Housing Trajectory, SD37), the LPA presented the potential new allocations for the Replacement LDP, refined by Officers post Deposit Stage Consultation, and confirmed that Parc Afon Ewenni had now been removed from the trajectory due to flood risk issues. This was noted by the Stakeholder Group and no further 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. This demonstrates that the housing trajectory remains deliverable despite removal of Parc Afon Ewenni.

Policy COM1(2): Craig y Parcau, Bridgend

p) What is the current use of the allocated site?

Craig y Parcau comprises approximately 6.6ha in total bound to the north by the A48, to the east by River Ogmere (and a public footpath running adjacent to it), to the south by New Inn Road, and to the west by mature trees.

The Western part of the site slopes towards and drains into the ravine and is predominantly grassland. The Eastern slopes towards the ravine as well as from North down to South. The Eastern part of the site consists of a large area of grassland, as well as the former Craig y Parcau boys home and the former Ty Afon former boys home which together have a combined floorspace of approximately 2,500sqm. These buildings are currently vacant and derelict, as was the former Llanerch Residential Home which was demolished for health and safety purposes following extensive fire damage.

Version 2 of the Predictive Agricultural Land Classification (ALC) Map indicates that development would result in the loss of 2.6ha (37%) of Grade 3a agricultural land. Background Paper 15: Best and Most Versatile Agricultural Land (See SD48) has undertaken a sequential test before determining there is an overriding need for the development, which justifies the loss of BMV. As part of their Deposit Consultation representation, Welsh Government confirmed, “the Council has demonstrated a pragmatic approach to considering BMV loss in the context of national planning policy and on that basis, **no objection** is offered” (original emphasis).

q) What is the proposed use of the allocated site?

Craig y Parcau is proposed to deliver 108 homes including 20% affordable units across two different parcels alongside associated green and blue infrastructure.

r) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

The constraints affecting the site are detailed within the Implementation and Delivery Appendix to the Replacement LDP, together with the Infrastructure Delivery Plan (SD77, 2022). However, none are considered significant obstacles to development within the Plan period due to suitable mitigation measures having been identified. The site’s supporting evidence has taken all constraints into account to demonstrate the site is both deliverable and viable. The main constraints are summarised below for ease of reference:

Transport

The Strategic Transport Assessment (SD95) has considered the collective impact of the proposed allocations. As summarised in Background Paper 24: Strategic Transport Assessment (See SD56), appropriate mitigation is possible via a s106 contribution to enhance the strategic highway network. For Craig y Parcau, the Strategic Transport Assessment concluded that no mitigation measures or contributions will be required to enhance the strategic highway network.

Ecology

The masterplan for the site has been informed by an ecology report prepared by Ethos Environmental Planning (See SD184). This identifies a number of ecological constraints, appropriate mitigation measures to address them and recommendations.

The site is comprised of a mosaic of grassland, scattered and dense scrub, woodland and hedgerows, with the River Ogmore located along the eastern site boundary. There are mature trees across the site and at the site boundaries which have aesthetic and ecological value. Structures were also present – these were in very poor condition and were not accessed internally. The report has also considered protected species (including Dormouse, Riparian mammals, Great crested newt, Birds, Bats, Badgers and Reptiles), the findings of which have informed the masterplan design of the development.

The report concludes that the site can be developed in an ecologically sensitive way through careful scheme design and the use of mitigation measures. The report's findings have influenced the indicative masterplan proposal (SD188) for the site which has informed mitigation measures for the site including the retention of vegetative habitat on site and the creation of a swale and an attenuation pond in the east of the site.

Archaeology & Heritage

There are no listed buildings on the Craig y Parcau site, though New Inn Lodge (30m from the site) and New Inn Bridge to the south (circa 10m) are both listed whilst New Inn Bridge (10m from the site) is also a Scheduled Ancient Monument. The masterplan acknowledges the two Grade II listed structures and Scheduled Ancient Monument and has been designed to ensure no development will be in close proximity in addition to no adverse impact upon the building. As such, there will be no adverse impact on the scheduled ancient monument and associated listed buildings.

Flood Risk

The site is located within Flood Zone A (considered to be at little or no risk of fluvial or coastal/tidal flooding) as detailed in Natural Resources Wales' Development Advice Maps and therefore the proposed form of development is considered appropriate on flooding grounds.

A review of the new Flood Map for Planning found that the site has no, or minimal areas located in flood risk zones. The site is classified within the Strategic Flood Consequences Assessment (See SD62) as 'Green' under the RAG assessment, indicating that flood risk to the site is likely to be acceptably managed. In terms of surface water, a ditch runs through the Craig site, corresponding to a narrow section

of Flood Zone 3. However, the masterplanning exercise has taken this into consideration and no development is located in the immediate vicinity of the ditch itself.

s) In light of the constraints, and having regard to the need to provide affordable housing, is the allocated site economically viable?

Yes, the site has been subject to rigorous independent viability testing, at a level of detail that is both meaningful and proportionate to the site's significance in the Replacement LDP. The site promoter submitted a Financial Appraisal in August 2022 using the Development Viability Model and this appraisal was reviewed by the Local Planning Authority. The appraisal demonstrates that the site can meet the proposed Replacement LDP policy requirements in full, while delivering a competitive, market risk adjusted return to the developer and a land value that is sufficient to encourage a land owner to sell for the proposed use. The appraisal affirms the site's viability based on the latest evidence, coupled with realistic and reasonable assumptions concerning costs and values. The appraisal was undertaken in accordance with the preferred approach set out in Welsh Government's Development Plans Manual (Edition 3), after appropriate consultation on key issues and principles with the site promoter.

t) Are the number of residential units proposed realistic and deliverable over the plan period?

Yes, the site is supported by a proposed illustrative masterplan and accompanying report, which were informed by a density level considered to respond most appropriately to the site-specific context. As demonstrated within SD187: Masterplan Report (pg 15), the masterplan has been refined to enable development parcels or areas to be quantified using a density that assimilates with the natural aesthetic of the site, which has enabled an accurate calculation of the overall anticipated housing numbers. The development will consist of a sustainable medium to high density scheme, ranging from 28 dwellings per hectare up to 35 dwellings per hectare, with a broad range of house types.

The number of residential units proposed is also considered deliverable and 108 dwellings are expected to be delivered within the plan period. The housing trajectory rate has been informed by site-specific evidence on deliverability, viability and phasing analysis in consultation with the site promoter and Housing Trajectory Group (held on 27/05/2022), there were outstanding matters of disagreement on the timing and phasing of sites in the plan period. Refer to Background Paper 4: Housing Trajectory (SD37).

u) What are the mechanisms and timescales for delivering the site?

The Implementation and Delivery Appendix sets out the key issues, constraints, phasing and mitigation measures which are required to deliver the site, from which monitoring indicators and triggers have been derived. It provides an overview of site-specific delivery and implementation issues, including site constraints, necessary mitigation and compensation measures. This informs the site's planning, infrastructure and s106 requirements and will ensure clarity for all parties at planning application stage. A s106 agreement will be utilised to outline specific triggers and thresholds for delivery of all planning obligations on the site.

Delivery of the site has been subject to site-specific phasing analysis (in combination with the site promoter and Housing Trajectory Stakeholder Group) to enable development of the housing trajectory. The site is projected to deliver 10 residential units in 2025/26, with 50 residential units in 2026/27 and 48 units in 2027/28; a total of 108 residential units within the plan period. Occupation of such units will form the basis for setting appropriate s106 triggers to deliver the necessary planning obligations and infrastructure requirements, which will be monitored by the LPA.

v) Is the allocation of the site essential to ensure the soundness of the Plan?

Yes, the site is identified as an Edge of Settlement allocation, considered appropriate to accommodate sustainable growth due to its proximity to the existing services and facilities. The site is well serviced by the active travel network which will help foster and promote transit-oriented development (See SD51 - Background Paper 19: 20-Minute Neighbourhood). Development of this site will also direct growth towards a Main Settlement that exhibits high housing need as identified by the LHMA. The site is supported by viability and deliverability evidence and presents a key opportunity for sustainable new development to take place over the plan period to help meet the LDP Vision and Objectives and ensure the implementation of the Regeneration and Sustainable Growth Strategy.