

VOLUME 17

**STATUTORY CONSULTEES PLUS OTHERS
CONSULTATION RESPONSES**

Title: Do you have any comments to make on the key issues and drivers, vision and objectives of the Deposit Replacement Local Development Plan?			
ID	Comment	Summary of changes being sought/proposed	Council response
145	<p>SOBJ4: To Protect and Enhance Distinctive Natural Places – OBJ 4c</p> <p>Ensuring there is sufficient capacity within the public sewerage system is an important element in protecting and enhancing the natural environment, whilst along with an adequate potable water supply and drainage infrastructure (including sustainable drainage systems) is key to ensuring new development sites are sustainable, viable and deliverable. As such, we welcome the provision of SOBJ 4 and its constituent specific objectives, in particular OBJ 4c.</p>	None – welcome SOBJ4 and constituent specific objectives.	Comments noted.
434	<p>Land east of Pencoed has been identified as a location for 770 residential units including affordable housing; a new primary school and nursery facility; outdoor recreational facilities as well as active travel routes and community facilities. Having spoken to a number of residents, concerns have been raised relating to the current capacity of local services such as the GP surgeries and dental services. It will be important that relevant stakeholders such as Pencoed Town Council and the county borough hold a review of current services and infrastructure and identify where there needs to be improvement in order to facilitate the increase in population as a result of the additional residential properties. As the replacement LDP highlights, the land east of Pencoed has been identified as a potential location for a primary school. It is incredibly disappointing that the council has not indicated as to whether or not this will be an English medium or Welsh medium school. Depending on the decision, it could have a further impact on traffic in the town given that if the primary school is English medium, it would likely feed into Pencoed comp. Further, I have been vocal over the past 2 – 3 years about the lack of Welsh medium education provision in the county borough,</p>	<p>Comments regarding Strategic Allocation PLA4: Land East of Pencoed, amenities and facilities within Pencoed, health care facilities, primary school, Moratorium</p>	<p>Comments noted. The Deposit Plan has been underpinned by the identification of the most appropriate scale of economic growth and housing provision, all of which have been based upon well informed, evidence based judgements regarding need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferred Strategy Strategic Growth Options). A range of growth scenarios across the whole Replacement LDP period have been analysed and discussed within the Strategic Growth Options Background Paper. This has considered how the County Borough’s demographic situation is likely to change from 2018-2033 and informed the most appropriate response for the Replacement LDP. As such the Replacement LDP identifies an appropriate plan requirement to enable a balanced level of housing and employment provision that will achieve sustainable patterns of growth, support existing settlements and maximise viable affordable housing delivery.</p> <p>The distribution of growth is further evaluated and justified in the Spatial Strategy Options Background Paper (See Appendix 43 – Background Paper 3). The strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on Best and Most Versatile (BMV) agricultural land. However, given the existing LDP’s success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough’s future housing requirements can be realised.</p> <p>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. As such, a Settlement Assessment has been undertaken (See Appendix 19) to establish a sustainable settlement hierarchy. 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.</p>

<p>especially in the Pencoed area. I would press on the council to ensure that the potential primary school is a Welsh medium school as there are already 2 English medium primary schools in Pencoed and the lack of provision of Welsh medium education in the wider county is shameful. We only need to look at recent cases in Pencoed to see that the current system is failing parents. These parents are now facing the decision of sending their children even further away to receive their education in Welsh, or to opt for English medium education. There's a fundamental question of fairness here? Why should children in Pencoed need to travel to receive their education in Welsh? A town the size of Pencoed should have a Welsh medium primary school. Moving on, it is welcome that the draft LDP suggests that the moratorium on developments west of the railway will remain in place. I want to emphasize the point that residents feel that this moratorium should remain for the duration of this plan period, even if the Penprysg road bridge is replaced during the plan period. However, it's important that the current bottleneck on Hendre road is resolved before we see the Penprysg bridge replaced. A significant amount of residents have expressed their desire for the road to be widened, especially the section of the road between Heol Wastadwaun and Min-y-nant. I would welcome further consideration to what happens to the town centre once the crossing is closed. There is scope for regeneration around the cenotaph which I'm sure would be welcomed by residents. I would like to welcome the provision of greenspaces in the area. However I would be interested to know as to whether consideration has been given to use the land known locally as the 'old brickyard' for green space development? I note the planned expansion of the Park and Ride facilities, however there will be land left over on the 'Old brickyard' that could be turned into a small park for the benefit of the community.</p>		<p>The plan preparation has involved the assessment of 171 sites. Each candidate site has been assessed against the criteria in the Candidate Site Assessment Methodology which was previously consulted upon (See Appendix 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessment, sites were examined based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints and opportunities. Site promoters were asked to prepare and submit a number of technical supporting studies to demonstrate the site's deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed appropriate were included for allocation in the Deposit Plan. As such, candidate site 219.C1 was considered as appropriate for allocation.</p> <p>As part of the proposed allocation of Land East of Pencoed, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (See Deposit Policy PLA4 – Page 75). The provision of new residential units, including affordable dwellings, will be incorporated alongside a new 1.5 form entry primary school, recreation facilities, public open space, plus appropriate community facilities and commercial uses.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced. The IDP 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. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p> <p>In terms of health, the Council has also been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations with the Deposit Plan progress.</p> <p>In relation to education, should PLA4: Land East of Pencoed development be adopted within the new Local Development Plan, a decision on language type for the primary provision (ie whether the school is Welsh or English-medium) would be undertaken in due course.</p> <p>In terms of the moratorium, Background Paper 16: Development West of the Railway Line, Pencoed, makes use of several recent studies focussed on the highway network in Pencoed to determine the requirement for the existing moratorium on development, as prescribed by Policy PLA6 in the Bridgend Local Development Plan, to be retained in the emerging replacement Local Development Plan 2018 to 2033. It has been identified that significant assessment has been undertaken into developing a solution which is likely to require major interventions to include the closure of the Hendre Road level crossing as well as a replacement Penprysg Road bridge with significantly improved capacity and active travel infrastructure. However, the available solutions are subject to many constraints which would need to be overcome through further assessment and design and will require collaboration of several statutory undertakers. There are also restrictions in terms of funding, with no existing guarantees that the required costs for major intervention can be met over the replacement plan period. It is therefore concluded that the existing development moratorium in Pencoed should be retained within the revised Local Development Plan 2018-2033 until a suitable transport intervention materialises.</p>
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Title: Do you have any comments to make on the growth strategy?			
ID	Comment	Summary of changes being sought/proposed	Council response
139	<p>It is noted that Deposit RLDP Policy SP1 'Regeneration and Sustainable Growth Strategy' seeks to make provision for a level of growth that achieves an equilibrium between the number of homes proposed (505 per year) and job opportunities expected (500 per year). NPTC are supportive of the proposed growth strategy which seeks to provide a balanced and sustainable level of economic growth to facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the Cardiff Capital Region and Swansea Bay Region.</p>	Support growth strategy	Comments noted
145	<p>SP1: Regeneration and Sustainable Growth Strategy</p> <p>We note that the Replacement LDP seeks to make provision for 9,207 new dwellings to deliver a requirement of 7,575 dwellings, along with the provision of 71.7 hectares of employment land. The prioritisation of land within or on the periphery of urban areas, in particular brownfield sites is generally more likely to result in less water and sewerage constraints than a greenfield approach, though this is location dependant.</p> <p>Regeneration and Sustainable Growth Strategy by Site Typology</p> <p>Regeneration Sites</p>	No proposed changes.	Comments noted. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.

	<p>We welcome the inclusion of the text at para 4.3.55 that sites will need to be serviced by existing infrastructure, and of a size to contribute to infrastructure improvements and/or new infrastructure. Dependant on the size and location of these sites, we will be able to advise of any water or sewerage infrastructure constraints at Deposit stage.</p> <p>Sustainable Urban Extensions</p> <p>We welcome the inclusion of the text at para 4.3.56 pertaining to the necessity for improvements to existing infrastructure and/or the provision of new supporting infrastructure. Strategic sites will invariably require water and sewerage infrastructure improvements which may need to be funded by developers if the sites are to progress in advance of potential regulatory investment. As such, we would welcome early engagement with landowners/developers to discuss potential requirements on these sites.</p> <p>Edge of Settlement</p> <p>In line with the text at para 4.3.37, we welcome the inclusion of text advising that offsite infrastructure may be required to serve Edge of Settlement sites – by their nature, these sites will require water and sewerage improvements which may need to be funded by developers if the sites are to progress in advance of potential regulatory investment. As such, we would welcome early engagement with landowners/developers to discuss potential requirements on these sites.</p>		
142	<p><u>Support in principle - Growth Strategy – Level of homes and jobs proposed</u></p> <p>The plan makes provision for 9,200 dwellings to deliver a requirement of 7,575 units (505 dpa), of which 1,977 are affordable. The flexibility allowance in the plan is 20%. The level of employment land provision is 71ha to deliver 7,500 jobs.</p>	<p>No proposed changes – support the growth strategy in principle</p>	<p>Comments noted.</p>

<p>The level of housing proposed is 1,900 units above the Welsh Government 2018-based principal household projection. The 2018 principal projection would equate to an annual build rate of 378 units per annum, which is below recent and long-term trends. The housing requirement (7,575) is a reduction of 2,115 units from the adopted LDP of 9,690 homes.</p> <p>The proposed level of housing growth (505 dpa) is above the past 5 and 10-year build rates (440 and 460 per annum respectively). The Councils Housing Trajectory (Appendix 1, Table 3, Row K) states completions in the plan period to date average 467p/a, broadly in the line with what is proposed. The level of housing proposed is in general conformity with the National Development Framework: Future Wales (see Annex1).</p> <p>Policy ENT1 allocates 71.7ha of employment land to deliver 7,500 jobs (500 per annum) over the plan period. This represents an increase of approximately 2,505 jobs over the Preferred Strategy. The increase in jobs is attributed to the 2018-based Welsh Government projections and 2019 Mid-Year Estimates, which increased the working age population in Bridgend, specifically the return of the student cohort (Economic Evidence Base Update, Feb 21). Applying the growth in the younger age cohort to Experian's economic forecast model generated an increase of 7,500 employed people over the plan period. The Council has sought to plan positively for this number by ensuring there are employment opportunities for all 7,500 extra residents over the plan period, building on its role as a major regional employment hub and capitalise on the expanded labour supply to support the expansion of existing businesses/new start-ups.</p> <p>On balance, the Welsh Government considers the Council, along with other relevant policy considerations set out in paragraphs 4.2.6 – 4.2.8 (PPW, Edition 11),</p>		
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<p>has taken the latest projections into account. The Welsh Government is of the opinion that the level of homes and jobs proposed is appropriate to the role of Bridgend as part of the South East Wales National Growth Area.</p>		
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Title: Do you have any comments to make on the spatial strategy?			
ID	Comment	Summary of changes being sought/proposed	Council response
139	<p>NPTC are supportive of the spatial strategy which in order to help realise the regeneration aspirations and balance this with the need to deliver future housing requirements, apportions growth towards Main Settlements that already benefit from significant services, facilities and employment opportunities and within these settlements prioritises the development of land within or on the periphery of the urban area, primarily on previously developed brownfield sites. It is noted that the settlements of Maesteg and Pyle, Kenfig Hill and North Cornelly within close proximity of NPT are identified as Main Settlements. NPTC would welcome further involvement in discussions about the ongoing development of these settlements.</p>	Support spatial strategy	Comments noted
145	<p>SP2: Regeneration Growth Area and Sustainable Growth Area Strategic Allocations</p> <p>Whilst the Strategic Sites are likely to require hydraulic modelling on both water and sewerage networks owing to the number of units proposed, it may be that initial phases of development can commence prior to the need for this. We will be able to advise further as we are consulted via the Pre-Application consultation stage.</p>	No proposed changes.	Comments noted. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.
142	<p><u>Support in principle - Spatial Strategy - Scale and location of growth</u></p> <p>The Council's Spatial Strategy ('Regeneration and Sustainable Urban</p>	No proposed changes – support the spatial strategy in principle	Comments noted.

<p>Growth Strategy') directs the majority of growth to land within or on the periphery of urban areas, towards areas that benefit from, or already have the capacity to deliver good infrastructure, services, facilities, regeneration opportunities and connecting more widely with the opportunities afforded by the Cardiff and Swansea City Regions. As per the Councils analysis (Settlement Assessment 2021) on the role of function settlements (reflected in the settlement hierarchy in Policy SF1 and Table 6 and 7) the majority of development is proposed in the higher tier more sustainable settlements. Around 75% of housing and 90% of employment is proposed to be located in settlement/growth area/tiers 1 and 2 with 46% of housing and 70% of the employment located in the primary settlement of Bridgend. The Welsh Government has no fundamental concerns on the spatial distribution of housing and employment growth, which is in 'General Conformity' with Future Wales.</p> <p><u>Support in principle - Best and Most Versatile Agricultural Land</u></p> <p>Bridgend have engaged with the Welsh Government regularly throughout the development of the LDP on land quality information, validation of surveys and Predictive ALC Map information. The plan notes a significant loss of 102.7ha. The Council has taken a pragmatic approach to protecting BMV land and minimising its loss in the plan. Allocations that would represent a loss of BMV have been well evidenced (Background Paper 15) for an overriding need (sequential test) and a balanced judgement has been made. In conclusion, the Welsh Government is of the view that 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.</p>	<p>No objection to the approach to protecting BMV land and minimising its loss in the plan</p>	<p>Comments noted.</p>
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Title: Do you have any comments to make on design and sustainable placemaking policies?

ID	Comment	Summary of changes being sought/proposed	Council response
208	<p>In respect of the above consultation, on Page 60 under SP3 Good Design and Sustainable Place Making it states : All developments must “Minimise opportunities for crime to be generated or increased, whilst promoting community safety in accordance with Secure by Design principles;” As this is included in the LDP the only comment I would make in respect of the document is that it is Secured by Design not Secure. Thanks you for including Secured by Design in the document which is vitally important.</p>	<p>Change ‘Secure by Design’ to ‘Secured by Design’ in Policy SP3 criteria (f) on Page 60.</p>	<p>Comments noted. The correct reference is noted, and the amendment will be made.</p>
145	<p><u>SP 3: Good Design and Sustainable Place Making</u></p> <p>We welcome the provision of criterion (I) of this policy. Adequate capacity within the public sewerage and water supply networks are key to ensuring new development sites are sustainable and deliverable.</p> <p>Mixed-Use Strategic Development Sites</p> <p>PLA1: Porthcawl Waterfront We welcome the inclusion of criterion 13 of Masterplan Development Principles.</p> <p>PLA2: Land south of Bridgend (Island Farm) We welcome the inclusion of criterion 12 of Development Requirements.</p> <p>PLA3: Land west of Bridgend We welcome the inclusion of criterion 14 of Development Requirements.</p> <p>PLA4: Land east of Pencoed We welcome the inclusion of criterion 9 of Development Requirements.</p> <p>PLA5: Land east of Pyle We welcome the inclusion of criterion 12 of Development Requirements.</p> <p>SP 6: Sustainable Housing Strategy</p>	<p>No proposed changes to SP3, SP6 or PLA1-5.</p>	<p>Comments noted. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage. The Council recognises the importance of public sewerage and water supply network capacity in ensuring new development sites are sustainable and deliverable.</p>

<p>We can advise that there is no reason why a combination of Welsh Water’s regulatory investment and developer funded infrastructure improvements cannot ensure the housing requirement cannot be delivered over the plan period.</p> <p>COM1: Housing Allocations</p> <p>Please see Appendix 1</p> <p>PLA8: Transportation Proposals</p> <p>Any proposals for new transport related development will need to take account of any water and sewerage infrastructure in the design stage of the proposal.</p> <p><u>Strategic Policy 7: Gypsy and Traveller Accommodation</u></p> <p>SP7 (1) Land off Old Coachman’s Lane – 3 pitches</p> <p>Given the location of this proposed allocation adjacent to our Court Colman Service Reservoir, we request that we are consulted on any future proposals at the site as we require more detail (such as that forthcoming at the planning application stage) before we can respond fully to the proposal. Any proposal will need to take account of public health, dam safety, water quality, security and health and safety to ensure that the supply of water to and from the asset and any operational issues at or from the asset are not impacted by the proposal.</p> <p>Water supply</p>	<p>No proposed changes to PLA8 – emphasise proposals for new transport related development will need to take account of any water and sewerage infrastructure in the design stage of the proposal</p> <p>No proposed changes to SP7 – request for future consultation on any development proposals.</p>	<p>Comments noted. PLA8 identifies (and where necessary), safeguards land for strategic transport schemes that will provide improvements to the public transport network, make better use of the existing highway network to permit appropriate reallocation of road space, which will deliver more sustainable travel within the County Borough. PLA8 is a development management policy framed within the context of SP5: Sustainable Transport and Accessibility, which states that development must also be supported by appropriate transport measures and infrastructure. This includes water and sewerage infrastructure. SP10 also references that all development proposals must be supported by sufficient existing or new infrastructure, specifically referencing utilities. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.</p> <p>Comments noted. SP10 references that all development proposals must be supported by sufficient existing or new infrastructure, specifically referencing utilities. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.</p>
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<p>There should be no issues in providing this site with a supply of clean water.</p> <p>Sewerage network</p> <p>There is no public sewerage in the vicinity of this site. As such, an alternative means of drainage will be required.</p> <p>SP7 (2) Land adjacent to Bryncethin Depot – 3 pitches</p> <p>Water supply</p> <p>There should be no issues in providing this site with a supply of clean water, though some level of offsite works will be required.</p> <p>Sewerage network</p> <p>There should be no issue in this site connecting to the public sewerage network, though some level of offsite sewers will be required.</p> <p>Wastewater Treatment Works (WwTW)</p> <p>There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development</p>	
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Title: Do you have any comments to make on the active, health, cohesive and social communities policies?			
ID	Comment	Summary of changes being sought/proposed	Council response
139	NPTC support the proposed framework for the provision and protection of well-located, good quality, tourism, sport, recreation and leisure facilities in order to diversify tourism in the County Borough. Given the links between the regeneration/ tourism development in Maesteg and the Afan Forest, we would suggest that collaborative discussions should take place between our authorities regarding proposed tourism developments and facilities within that area.	Support active, health, cohesive and social communities policies	Comments noted

145	<p>COM13: Provision of Cemeteries</p> <p>Any proposals for new cemetery development will need to take account of any water and sewerage infrastructure in the design stage of the proposal.</p> <p>SP10: Infrastructure</p> <p>We applaud the provisions set out in this policy and the supporting text that follows. As indicated above, developers may be required to fund improvements to water and sewerage infrastructure should they wish to bring forward a development site in advance of our regulatory investment.</p> <p>With specific regard to water and sewerage infrastructure, where insufficient capacity is available and where no reinforcement works are programmed within the respective Capital Investment Programme, the requisition provisions (of the Water Industry Act 1991) can be entered into for the water and sewerage infrastructure. The requisition provisions do not apply in the instance of WwTW, and as such planning obligations may be necessary.</p> <p>Accordingly, it is pleasing to note the wording of this policy, and the inclusion of 'utilities' as one of the specific types of infrastructure.</p>	<p>No proposed changes to COM13 or SP10 – emphasise proposals for new cemetery development will need to take account of any water and sewerage infrastructure in the design stage of the proposal</p>	<p>Comments noted. SP10 references that all development proposals must be supported by sufficient existing or new infrastructure, specifically referencing utilities. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.</p>
142	<p>Category B - Flooding</p> <p>The Strategic Flood Consequences Assessment (2020) identifies that some of the strategic sites and housing allocations are subject to flood risk. These sites are categorised as 'amber' in the assessment where it 'may' be possible to develop the site in line with the requirements in TAN15 subject to a detailed site-specific Flood Consequence Assessment and satisfaction of the Justification Tests as required by Policy DNP9. The flood risk for each Strategic Site is clearly set out in Appendix 5 of the plan, where the Council is of the view the risk of flooding can be overcome through flood defence schemes and master</p>	<p>No proposed changes, although advice to:</p> <p>i) continue to engage with NRW and work towards a Statement of Common Ground (SOCG) making clear NRW's view on any sites affected and mitigation measures proposed</p>	<p>Comments noted.</p> <p>An updated SFCA was commissioned post Deposit Stage and this considered the impacts of the revised Flood Map for Planning and draft Technical Advice note 15. A check of all proposed sites was conducted post Deposit Stage and there are updates on three sites in particular:</p> <p>Parc Afon Ewenni was subject to robust re-assessment of its sustainability, deliverability and viability credentials in the same manner as all other candidate sites and was considered deliverable at Deposit Stage. However, the revised draft Technical Advice Note 15, supported by the new Flood Map for Planning, has revealed substantial flood risk issues across the Parc Afon Ewenni site. While the Flood Map for Planning has no official status for planning purposes until June 2023, additional site-specific modelling work has failed to demonstrate that this constraint can be overcome in the short term. As such, Parc Afon Ewenni can no longer be relied on to contribute to delivery of the housing requirement and has been removed from the housing trajectory.</p> <p>The coastal setting of the Porthcawl Waterfront site makes it particularly important to consider the impacts of climate change on tidal flood risk as the majority of the site is susceptible to tidal flooding. The draft of the forthcoming revised TAN15 acknowledges that there are some large urban communities already located in areas</p>

<p>planning. The Infrastructure Delivery Plan identifies key flood defence infrastructure required before key sites can be delivered. We strongly advise the LPA continue to engage with NRW on these key aspects and work towards a Statement of Common Ground (SOCG) making clear NRW's view on any sites affected and mitigation measures proposed. A SOCG of this nature has worked well in other examinations in Wales to assist all parties to understand the issues, potential/outstanding conflicts with national policy and the implications of the timing, phasing and delivery of infrastructure / mitigation measures.</p> <p>The Council should continue to ensure no highly vulnerable development is allocated in Zone C2. Whilst development in Zone C1 may be acceptable in policy terms, the LPA will need to demonstrate allocations are suitable and deliverable in line with mitigation measures. The LPA should take account of the revised TAN15 and its implication on policies and allocations in the plan. If housing sites or units are affected by flood risk and are no longer considered appropriate for allocation in the plan, the authority should ensure that any housing lost is replaced with an equal number in the same strategy area to deliver on the plan requirement. The revised TAN15 is anticipated to be published September 2021.</p>	<p>and</p> <p>ii) take account of the revised TAN15 (when published) and its implication on policies and allocations in the plan</p>	<p>at risk of flooding and investment in flood defence infrastructure will be required to keep such existing populations safe. Following dialogue with Welsh Government, Coastal Risk Management Programme funding was secured for major flood defence works at Porthcawl. Phase 1 (Eastern Promenade) is designed to protect the Salt Lake area and existing development to the north. Phase 2 (Coney Beach) encompasses flood and coastal erosion measures along the Coney Beach frontage to safeguard and enhance the existing flood protection to the frontage provided by the existing ad-hoc revetment. Implementation of these works will better protect the existing community from flooding and the effects of flooding. However, they also have significant potential to achieve wider social, economic and environmental benefits to contribute towards the statutory well-being goals of the Well-being of Future Generations (Wales) Act 2015. The greatest overall value can be achieved by combining these investments in flood defence infrastructure with other investment in active travel infrastructure, public realm improvements and regeneration-led development. The existing flood defences combined with completion of the new flood defence works has rendered the site a Defended Zone and will provide a coincidental opportunity to realise wider regeneration and placemaking benefits for the area through the delivery of Porthcawl Waterfront. On this basis, it is considered that the Porthcawl Waterfront site can be developed in full compliance with the requirements of the future revised TAN15. The defences are expected to provide a high standard of protection; significantly reducing the risk of flooding in areas within Zone 3 and respective areas in Zone 2. Nevertheless, all development in the area will necessarily be accompanied by a Flood Consequence Assessment to ensure the new development incorporates resilience to remain dry and safe as per the tolerable conditions set out in the future revised TAN15. The Replacement LDP's housing trajectory has factored in appropriate timescales for the completion of coastal flood defence works before forecasting dwelling completions. This presents a practical example of how to deliver a high priority brownfield regeneration scheme in a Defended Zone in the context of the forthcoming revised TAN15. A SoCG will be pursued with NRW to formalise this position.</p> <p>The Flood Map for Planning has been updated around Pencoed College and there are no reasons (relating to flood risk) that would prevent the Land East of Pencoed site coming forward.</p>
<p><u>Category C - Gypsy and Traveller Accommodation Assessment (GTAA) – Status and the delivery of sites – Policy SP7</u></p> <p>The Council's Gypsy and Traveller Accommodation Assessment 2020 (GTAA) covers the period 2018-2033 identifying a need of 7 pitches. To ensure compliance with legislation and planning policy, the study should be formally agreed by the relevant Welsh Government Minister prior to the examination. The Council has clarified via Background Paper 18: Gypsy</p>	<p>No proposed changes, although advice to:</p> <p>i) formally agree the GTAA with the relevant Welsh Government Minister</p> <p>and</p> <p>ii) demonstrate the related</p>	<p>The GTAA was approved by Cabinet and submitted to Welsh Government for approval in December 2020, in order to ensure sufficient time for formal sign off by the relevant Welsh Minister prior to Deposit Stage consultation. Initial feedback was received from Welsh Government in April 2021, follow up meetings were held throughout May 2021 and the Council has responded to all queries raised by Welsh Government. The Council remains committed to progressing the GTAA to formal approval and has undertaken everything possible to enable this to happen.</p> <p>When the GTAA was completed, the total estimated pitch provision needed for Gypsies and Travellers was 7 pitches up until 2033. Since then, one family has met their accommodation needs on an existing authorised site, leaving a remaining need for six pitches over the Plan period. This need stems from two families (i.e., three pitches per family). One of these families has recently received planning consent to intensify their existing site and meet their accommodation needs (planning application P/21/677/FUL refers). This leaves a remaining need for 3 pitches, which the Council considers can be appropriately accommodated by the original proposed allocation at Court Colman (SP7(1)), which is already in the family's ownership. The Council has</p>

<p>and Traveller Site Options (para 4.4) and Table 9 of the Deposit plan the most up to date need figure stands at 6 pitches, of which 5 pitches are immediate (by 2025). Policy SP7 allocates two permanent sites of three pitches to meet the remaining need identified over the remaining plan period. The Council will need to demonstrate at the examination that the sites can be delivered in the identified timescales.</p>	<p>allocations can be delivered in the identified timescales.</p>	<p>liaised directly with this family to ensure the site is deliverable. Refer to the Gypsy and Traveller Site Options Background Paper.</p>
<p><u>Category C - Affordable Housing Exception Sites</u></p> <p>The Welsh Government has the following observations on Policy COM5:</p> <ul style="list-style-type: none"> • Planning Policy Wales (PPW, Edition 11) identifies that the release of exception sites can be “within or adjoining” existing settlements. Policy COM5 only permits exception sites outside settlement boundaries and should be amended in this respect. • TAN2 requires authorities to set out the definition of ‘local need’ in the plan and the area within which the need will be considered ‘local’. The reasoned justification to Policy COM5 should be amended accordingly. 	<p>Wording changes to Policy COM5 in line with PPW(11) and TAN2.</p>	<p>Comments noted and accepted. Policy COM5 will be amended to include “within or adjoining” and the definition of ‘local need’ will be included in the reasoned justification.</p>
<p><u>Category C - Delivery and Implementation</u></p> <p>The Council has undertaken a significant amount of engagement and technical work in respect of place making, viability, delivery and infrastructure to inform the Deposit Plan in line with the DPM (Edition 3). This is supported (subject to the comments in this annex) and puts the LPA in a good position moving to examination, namely:</p> <ul style="list-style-type: none"> • Engagement work with key housing and viability stakeholders groups to achieve broad consensus on the timing of phasing of sites and the viability development costs for the plan wide appraisal; • The completion of site specific viability testing. However, we note these appraisals 	<p>Advice to:</p> <ul style="list-style-type: none"> i) Include site-specific viability testing information within the evidence base when the plan is submitted for examination ii) Incorporate a visual element to the Key Site PLA 1-5 policies through masterplans/ concept/ 	<p>Comments noted and accepted. Appropriately anonymised site-specific viability testing information will be released within the evidence base, masterplans will be appended to the Plan in support of Policies PLA1-5 and the Infrastructure and Delivery Appendix will be expanded to include key site-specific information for all remaining housing allocations listed in Policy COM1 and employment sites.</p> <p>The three site promoters progressing the housing allocations in Maesteg and the Llynfi Valley (COM1(3) to COM1(5)) have now signed a collective Statement of Common Ground. The developers are confident that the latent demand in the area will allow for the delivery of COM1 (3), (4) and (5) in parallel. The three parties have also collectively instructed Asbri Transport to undertake an assessment on the cumulative impacts of the development on Junction 36. In summary, the collective impact of the development is not considered significant to the operation of the junction and the local facilities in Pont Rhyd-y-Cyff, and Maesteg will be a significant trip attractor for the site, enabling the development to contribute towards the regeneration of the wider area. The site promoters have also undertaken further consultation with Dŵr Cymru Welsh Water to confirm there is capacity in the network to accommodate the collective development. This is set out in further detail in the Statement of Common Ground that accompanies this submission.</p>

do not form part of the evidence base and should be made available, in an appropriate format, when the plan is submitted for examination;

- The inclusion of detailed Strategic Site policies and placemaking principles supported by an Infrastructure Plan setting out the costs, funding and phasing of each Strategic Site, including social and physical infrastructure requirements over the plan period;

- A clear articulation of the spatial distribution of housing and supply by component and settlement category;

- The inclusion of a housing trajectory and supporting tables on the timing and phasing of all allocations and sites;

- Detailed urban capacity study to support the assumptions on small and windfall sites.

The examination will need to consider whether the plan and its appendices contain sufficient information in relation to the delivery of all housing allocations, including non-strategic housing sites. Specifically, whether key information in the Infrastructure Plan and other background papers should be included in the plan and/or its appendices. We have the following comments:

- The Council considers many of the allocations are well advanced in the master planning/ pre-application process. The plan would benefit if there were a visual element to the Key Site PLA 1-4 policies through masterplans/concept/schematic frameworks as set out in the DPM (Table 11, page 92). This will enable all parties to understand how the sites will be developed in broad terms, such as proposed land uses, access, infrastructure requirements, constraints and areas of protection. We would direct the LPA to adopted plans which have embedded this approach (Swansea, Cardiff, Neath).

schematic frameworks

iii) Expand the Infrastructure and Delivery Appendix to include key site-specific information for all remaining housing allocations listed in Policy COM1 and employment sites. This should include implications arising from capacity issues at Junction 36 of the M4, where relevant.

<ul style="list-style-type: none"> • The Infrastructure and Delivery Appendix (Appendix 5) sets out key site-specific information for the Strategic Sites only. More detailed information should be included on all remaining housing allocations listed in Policy COM1 and employment sites. This will set out what is expected from the development and the costs in bringing the site forward. • The Infrastructure Plan identifies that housing allocations in Maesteg and the Llynfi Valley (COM1(3) to COM1(5)) have limited capacity at the wastewater treatment works and upgrades will be costly. The Council, through the Implementation Appendix, should explain what infrastructure is required and the implications on the timing and phasing of housing allocations in these areas. The appendix should also explain any implications arising from capacity issues at Junction 36 of the M4. • Statements of Common Ground (SoCG) with developers on the Strategic Sites and the relevant statutory bodies such as NRW and Welsh Water would be advantageous to support the plan at examination. 		
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Title: Do you have any comments to make on the employment strategy?			
ID	Comment	Summary of changes being sought/proposed	Council response
145	<p>SP11: Employment Land Strategy, ENT1: Employment Allocations, ENT2: Protection of Employment Sites & ENT5: Former Ford Site</p> <p>The following provisions are applicable to all individual development plots located within allocated and protected employment sites:</p> <ul style="list-style-type: none"> • We will work with your authority to support sustainable economic development, however your authority and potential developers should be aware that the obligations of a water and sewerage 	No changes proposed.	Comments noted. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.

<p>undertaker extends to 'domestic' supplies only. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.</p> <ul style="list-style-type: none">• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage modelling assessments to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify and required infrastructure improvements.• Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).• Welsh Water has rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted. <p>ENT11: Energy Efficiency Provision Within the Design of Buildings</p>		
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	Ensuring we can maintain a regular supply of water to customers can be a challenge, particularly at peak demand times and as such we support the provisions of this policy, in particular criterion 7 with regard to water reuse and recycling and rainwater harvesting.		
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Title: Do you have any comments to make on retail centres and development policies?

ID	Comment	Summary of changes being sought/proposed	Council response
139	NPTC support the retailing, commercial and service centre policies within the Deposit RLDP (Policies SP12; ENT6-91) which seek to retain a retail core within the Primary Shopping Areas and provide flexibility to accommodate and respond to changing retailer/ occupier requirements and demands over the Plan period. Given that Maesteg acts as an important centre for those living in the Upper Afan Valley, NPTC welcome the recognition in the Deposit RLDP (Paragraph 5.4.49) of enabling opportunities to improve the quality of the town centre environment, redevelop prominent vacant units for retail or other complementary uses and expand the range of commercial leisure uses to improve the performance of the centre, diversify the range of services and enhance the night time economy through expanding the food and drink offer.	Support retail centres and development policies	Comments noted

Title: Do you have any comments to make on the renewable energy, mineral resources and waste management policies?

ID	Comment	Summary of changes being sought/proposed	Council response
164	In January 2021 the Coal Authority's Executive Leadership Team reviewed the Coal Authority's position on surface coal resource, to ensure that it is most appropriately aligned with the present political and economic climate. It was noted that there is no legislative basis to justify the continuation of our previous position towards the safeguarding and prior		Comments noted

	<p>extraction of coal reserves. The conclusion of this review is that the Planning team will no longer request that development plans include policies to safeguard surface coal resource nor to promote its extraction or the extraction of associated unconventional hydrocarbons. Going forward, all decision making regarding the safeguarding of surface coal resource will lie with the relevant authority. It is considered that this is a positive step forward, which recognises those authorities' superior knowledge of local circumstances and responsibility for local environments and communities. This supports the Coal Authority's own mission statement of making a better future for people and the environment in mining areas.</p>		
139	<p>NPTC note that in line with national policy and guidance, BCBC are seeking to set ambitious renewable energy deployment targets to maximise the use of local resources available in the County. We support Deposit RLDP Policies SP13 and EN10-EN112 which seek to maximise the energy efficiency of new development, integrate energy generation into wider development proposals, and ensure that low carbon heating systems are installed. NPTC support the approach taken in Deposit RLDP Policy ENT10, noting in particular the conformity with Future Wales Policy 16 'Heat Networks' requirement for planning applications for large scale developments to prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option. With regards to wind farm development, we note that Future Wales Pre-Assessed Area for Wind Area 9 crosses the County Boroughs. As noted in Paragraph 5.4.84 of the Deposit RLDP, Future Wales states that communities should be protected from significant cumulative impacts to avoid unacceptable situations whereby, for example, smaller settlements could be potentially surrounded by large wind schemes. Given that the Pre-Assessed Area crosses both boundaries,</p>	<p>Support renewable energy policies</p>	<p>Comments noted</p>

	<p>we would suggest that it would be beneficial to work collaboratively and consistently to consider the approach to wind within this Pre-Assessed Area.</p>		
145	<p>P4: Mitigating the Impact of Climate Change</p> <p>We welcome the inclusion of criteria 6. Welsh Water operate wastewater treatment works (WwTW) and Combined Sewer Overflows (CSO) and must comply with consenting levels set out by the environmental regulator Natural Resources Wales (NRW). As such, minimising pollution from wastewater is something that we strongly believe in and adhere to. We also welcome the inclusion of criterion 7 of this policy. Disposing of surface water in a sustainable manner will ensure that it will not communicate with the public sewerage network, thereby having the effects of not only protecting the environment and reducing flood risk, but also ensuring there is sufficient capacity in the public sewerage network for foul-only flows from development sites. We are pleased to note and welcome the inclusion of the text under para 5.2.46. From a water supply perspective, Bridgend CBC area is within our Tywi Conjunctive Use System (CUS) Water Resource Zone (WRZ). Water is abstracted from the River Tywi at Nantgaredig and pumped to our Felindre Water Treatment Works (WTW) which in turn supplies Bridgend. Our Final Water Resources Management Plan (2019) which looks ahead to 2050 doesn't anticipate there being any significant concerns in Tywi CUS WRZ.</p> <p>This does not however mean that there are not any localised issues on the water supply network, or that infrastructure is sufficient to supply proposed larger development sites such as Urban Extensions. From a wastewater network and treatment perspective, we are pleased to note that the para includes reference to ensuring there is</p>	<p>No changes proposed.</p>	<p>Comments noted. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.</p>

	<p>sufficient wastewater network and WwTW capacity to serve new development</p> <p>SP14: Sustainable Development of Mineral Resources</p> <p>We welcome the provisions of this policy, and in particular criterion 6. We would request that a criterion is added to ensure that any minerals extraction also take account of the location of our water and sewerage assets.</p>	<p>Proposed change to SP14: include a criterion to ensure that any minerals extraction takes account of the location of water and sewerage assets.</p>	<p>Comments noted. The Replacement LDP Policy SP14 will be revised accordingly.</p>
142	<p><u>Category C - Minerals</u></p> <p>The second review of the Regional Technical Statement (RTS2) has been endorsed by Bridgend Council identifying no allocations are required in the plan for the production of crushed rock or sand and gravel. It is a requirement of the RTS2 for all authorities, including Bridgend Council, to agree a Statement of Sub-Regional Collaboration (SSRC) on their contribution to the future provision of aggregate production. All authorities in the Cardiff City Sub-Region (LDP, paragraph 5.4.107) have agreed a SSRC but the SSRC does not form part of the Council's evidence base and this must be included when the plan is submitted for examination.</p> <p>Policy ENT14 seeks to control development within mineral buffer zones around existing quarries and mineral operations. Whilst the quarries and their buffer zones have been identified spatially on the proposals map, there is no corresponding list in Policy ENT14. This list should usefully be included in the policy to clearly identify the location of the mineral operations and their buffer zones.</p>	<p>Include a Statement of Sub-Regional Collaboration within the LDP evidence base</p> <p>Amend Policy ENT14 to identify the location of the mineral operations and their buffer zones</p>	<p>Comments noted. The Council will seek to resolve this issue before the plan is submitted for examination.</p> <p>Comments noted and accepted. A corresponding list will be added within Policy ENT14.</p>

Title: Do you have any comments to make on the natural and built environment policies?			
ID	Comment	Summary of changes being sought/proposed	Council response
145	<p>DNP8: Green Infrastructure</p> <p>We support the proposal to maximise the amount of green infrastructure on site, and in particular through the provision and integration of SuDS related infrastructure.</p> <p>DNP9: Natural Resource Protection and Public Health</p> <p>We welcome the inclusion of criterion 4 (Water Pollution) and the subsequent supporting text – the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply.</p>	No changes proposed.	Comments noted. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.

Title: Do you have any comments to make on the key proposals? Maesteg and the Llynfi Valley			
ID	Comment	Summary of changes being sought/proposed	Council response

Title: Do you have any comments to make on the key proposals? Porthcawl, Pyle, North Cornelly and Kenfig Hill			
ID	Comment	Summary of changes being sought/proposed	Council response
182	<p>The ultimate test of the soundness of the LDP rests with its compatibility with its visions and objectives. Below are excerpts of the visions and objectives for the future of Porthcawl. Porthcawl Civic Trust Society is of the opinion that BCBC's intention to build in excess of 1,115 dwellings within Porthcawl will not encourage tourism neither will it achieve the overarching aspiration to create a premier seaside resort of regional significance. Most tourists to Porthcawl arrive by cars via Junction 37 off the M4 and use Salt Lake as a car park which currently holds over 1,000 cars. The loss of Salt Lake as a car park will deter visitors to Porthcawl, as they will be unable to park and will find it easier to just travel to the next M4 Junction and enjoy Aberavon.</p>	<p>Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned through the identification of the most appropriate scale of economic growth and housing provision, all of which have been based upon well informed, evidence based judgements regarding need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferred Strategy Strategic Growth Options). A range of growth scenarios across the whole Replacement LDP period have been analysed and discussed within the Strategic Growth Options Background Paper. This has considered how the County Borough's demographic situation is likely to change from 2018-2033 and informed the most appropriate response for the Replacement LDP. As such the Replacement LDP identifies an appropriate plan requirement to enable a balanced level of housing and employment provision that will achieve sustainable patterns of growth, support existing settlements and maximise viable affordable housing delivery.</p> <p>The distribution of growth is further evaluated and justified in the Spatial Strategy Options Background Paper (See Appendix 43 – Background Paper 3). The strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus</p>

<p>The concept of using the lack of car parking as a deterrent for people using cars to travel is admirable, but ill conceived and does not take into consideration the rapid move away from using fossil fuels to power cars, the future will see electric and hydrogen cells powering cars which will still need a place to park. The majority of employment in Porthcawl is tourism related, the draft LDP will only provide 40 jobs at the proposed Aldi store. Urbanisation by building in excess of 1,115 dwellings will not increase tourism and therefore not increase employment. Vision and Objectives relating to Porthcawl NR3 Porthcawl, in its pivotal position on the Swansea Bay waterfront, should maintain and enhance its role as a vibrant and distinctive tourism and leisure destination. LS16 The Porthcawl Waterfront Regeneration Site will need to be delivered to revitalise the town as a premier seaside resort. OBJ 1d To realise the potential of Porthcawl as a premier seaside and tourist destination by prioritising the regeneration of its waterfront and investing in key infrastructure. This will also improve the attractiveness of the town as a place to live and work, whilst enhancing the vibrancy of the Town Centre. Porthcawl 4.3.13 The key to the area's success is to balance the nature of development proposed with the interests of tourism and that of the environment. PLA1: Porthcawl Waterfront, 1,115 residential units. Porthcawl Town Centre 5.4.50 Porthcawl has been the focus of long-established plans for tourism-led regeneration focused along the waterfront. Tourism 5.4.127 Future Wales emphasises the importance of tourism as part of the foundational economy A key objective of the Welsh National Marine Plan is to 'recognise the significant value of coastal tourism and recreation to the Welsh economy and well-being and ensure such activity and potential for future growth are appropriately safeguarded'. 1. To produce high quality sustainable places. 1c. To realise the potential of Porthcawl as a premier seaside and tourist destination which capitalises on the regeneration of its</p>		<p>on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on Best and Most Versatile (BMV) agricultural land.</p> <p>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. As such, a Settlement Assessment has been undertaken (See Appendix 19) to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables the Replacement LDP will maintain Porthcawl's role as a Main Settlement capable of supporting regeneration-led growth, demonstrating capacity for sustainable growth based on its accessibility, availability of amenities and employment provision in the context of its existing population base.</p> <p>The plan preparation has involved the assessment of 171 sites. Each candidate site has been assessed against the criteria in the Candidate Site Assessment Methodology which was previously consulted upon (See Appendix 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessment, sites were examined based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints and opportunities. Site promoters were asked to prepare and submit a number of technical supporting studies to demonstrate the site's deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>As part of the proposed allocation of Porthcawl Waterfront, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (See Deposit Policy PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active travel links plus education, retail and community facility provision.</p> <p>A Placemaking Strategy has been developed and produced of which provides the framework to deliver the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.</p> <p>In terms of Salt Lake, development will include a new food store, residential (including affordable housing), supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but also act, with others, to set a quality benchmark which will also need to be achieved elsewhere.</p> <p>Mixed-use development will be encouraged throughout the development. Commercial units will be considered on the ground floor if there is market demand for such uses. Retail uses, restaurants and cafes will be particularly encouraged. This mix of uses will help bring life and vitality during the day and into the evening.</p>
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<p>waterfront. 1.19 Porthcawl Regeneration Area COM 1(25) This 48 hectare brownfield waterfront site provides a significant opportunity through comprehensive regeneration to transform Porthcawl into a premier seaside resort. 4.16 Porthcawl has been the focus of long-established plans for tourism-led regeneration focused along the waterfront. Porthcawl benefits from primary road connections to the wider strategic road network (the M4). 3. Vision and Objectives Regeneration led growth will also be channelled towards Porthcawl through redevelopment of its waterfront to capitalise on the town's role as a premier seaside and tourist destination. Several Key Issues and Drivers of the Replacement LDP (notably NR3 and LS16) highlight the importance of maintaining and enhancing Porthcawl's role as a vibrant and distinctive tourism and leisure destination through re-developing the Waterfront Regeneration Area and capitalising on its pivotal position on the Swansea Bay waterfront. This Society strongly objects to the removal of the green wedge policy as it is protection against urban sprawl. "Proposed Green Wedges The Replacement LDP will not feature a green wedge policy, therefore proposals for green wedges will not be taken forward (see Green Wedge Review Background Paper). Site Site Area (Ha) Candidate Site Ref No. Settlement Hierarchy Category Proposed Use of Site Danygraig Avenue (Land East of) 5.21 182.C1 Porthcawl Newton Green Wedge." This referral to the Maritime Centre should be removed as it no longer viable. 4.25 Some substantial improvements to Porthcawl's waterfront leisure offer have already been delivered or received planning approval..... the Porthcawl Maritime Centre was approved in November 2018 and will provide and will include a coastal science and discovery centre, cafe, wine bar, roof terrace and microbrewery. Porthcawl Civic Trust Society reject the Draft Replacement LDP in relation to the development of Porthcawl as the outcome will not deliver the overarching</p>		<p>Sandy Bay will accommodate public open space, residential, education provision and commercial. In terms of open space and recreation, it's acknowledged that such provision is considered important for health and well-being, therefore the development should aim for standards in excess of the minimum. Policy PLA1 requires development of Porthcawl Waterfront to Green Infrastructure and Outdoor Recreation Facilities in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance. s of open space. It is envisaged that significant public spaces will be created within the Sandy Bay element of the development, predominately within the Griffin Park Area (incorporating and extending the existing Griffin Park). This extension of Griffin Park could be utilised for events and activities, potentially including the fair. A significant expansion of Griffin Park, to provide amenities for the residential area, is key to the development framework. The expanded Griffin Park, in turn, leads to the Relic Dunes on the site's south-eastern edge. A large linear tapered public open space/residential square is proposed to spring from the Relic Dunes and provide a "grand" setting for the residential development around the space. Elsewhere on Sandy Bay, smaller "pocket" open spaces will be provided. LAPs, LEAPs and NEAPs will also be incorporated within these areas of open space. However, exact locations of open space will be determined at the formal planning application stage. The seafront will also be clearly defined by the introduction of a potential recreational route along Sandy Bay that links seamlessly with the Eastern Promenade.</p> <p>Additionally, there are plans for creating new facilities at Cosy Corner, including community facilities whilst also creating employment opportunities. The plans for Cosy Corner include an all-new stone and glass-clad building which will feature new premises suitable for retail and start-up enterprises. The council also wants to create new meeting space for community use, a parade square for the Sea Cadets and an office for the harbour master as well as changing facilities for users of the nearby marina. If funding allows, plans are in place that will further enhance the scheme with new landscaping, public seating, a children's play area and a canopy structure capable of providing comfortable outdoor shelter from rain and the sun.</p> <p>Strategic Policy 16: Tourism and supporting development management policies will promote tourism development. The LDP will also provide the framework for the provision and protection of well-located, good quality, tourism, sport, recreation and leisure facilities and to diversify tourism in the County including Porthcawl, thereby contributing to the Aims and Priorities of the Bridgend County Destination Management Plan (2018-2022) (See Appendix 30).</p> <p>In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car par enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans.</p>
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	<p>aspiration to create a premier seaside resort of regional significance.</p>		<p>Furthermore, the Council have prepared a Sustainability Appraisal (SA) to inform the Replacement LDP (See Appendix 9) of which was carried out to identify the likely significant environmental and wider sustainability effects from the Deposit Plan. It also considers whether any mitigation and enhancement measures should be incorporated within the Replacement LDP to ensure the avoidance of likely significant adverse effects and to enhance the effectiveness of the plan. The findings of the SA indicate that development of Porthcawl Waterfront with its proposed range of land uses will likely produce a wide range of significant beneficial effects.</p> <p>In terms of employment, the imbalance and shortage of employment land in Porthcawl is acknowledged compared with other settlements within the County Borough, 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.</p> <p>In relation to the removal of the green wedge policy, a report (See Appendix 34) has been undertaken of which reviews the existing green wedge designations in the adopted Bridgend Local Development Plan 2006-2021 and considers the need for their continuation in the emerging Replacement Bridgend Local Development Plan 2018-2033. It concludes that whilst existing LDP Policy ENV2: Development in Green Wedges has been successfully used for its primary objective of preventing coalescence, other policies contained within the extant LDP, particularly Policy ENV1: Development in the Countryside, has also been successful in preventing coalescence. Furthermore, the Replacement LDP features defined settlement boundaries and policies of which strictly control development in the countryside, open space, biodiversity, landscape and the environment whilst also allocating sufficient land for housing. As such, it is therefore considered that the green wedge policy need not be taken forward in the Replacement LDP, as it will not be necessary.</p> <p>Furthermore, a review of the existing settlement boundaries has taken place (See Appendix 38 - Settlement Boundary Review). Porthcawl is defined as an area of growth – but which can predominately be served within the existing settlement boundary. A more flexible approach to defining the settlement boundary around this settlement would mean the inclusion of greenfield sites that could be ‘cherry-picked’ by developers and undermine the delivery of the brownfield regeneration site that is crucial for the success of the plan. As such, no changes have been made to the settlement boundary of Porthcawl.</p> <p>In terms of the Maritime Centre, all references have been removed with the Deposit Plan and other supporting documents.</p> <p>Further consultation will take place on the Placemaking Strategy being prepared for Porthcawl, of which will allow for further public engagement and representations to be made in relation to the proposals intended for the regeneration site. Further information relating to the consultation will be made available on the Council’s website once details have been finalised.</p>
145	<p><u>SP2 (1) Porthcawl Waterfront – 1,020 units</u></p> <p>Water supply</p> <p>Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers’ supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.</p>	<p>No changes proposed.</p>	<p>Comments noted. SP10 references that all development proposals must be supported by sufficient existing or new infrastructure, specifically referencing utilities. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.</p>

Sewerage network

Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required. There are numerous public sewers crossing this site for which protection measures will be required in the form of easement widths or diversions.

Wastewater Treatment Works (WwTW)

There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development.

SP2 (5) Land east of Pyle – 1,057 units

Water supply

Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required. There is a 200mm distribution main and a 250mm trunk main traversing the site for which protection measures will be required in the form of easement widths or diversions.

Sewerage network

Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required. There are three sewers and a rising main traversing

<p>the site for which protection measures will be required in the form of easement widths or diversions – these are a 100mm combined rising main, a 150mm combined sewer, a 300mm combined sewer and a 525mm combined sewer.</p> <p>Wastewater Treatment Works (WwTW)</p> <p>There should be no issue with Afan WwTW accommodating the foul-only flows from this development.</p>		
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Title: Do you have any comments to make on the key proposals? Ogmore and Garw valleys			
ID	Comment	Summary of changes being sought/proposed	Council response

Title: Do you have any comments to make on the key proposals? Bridgend and Pencoed			
ID	Comment	Summary of changes being sought/proposed	Council response
1370	<p>I hereby object to the development at Laleston for the construction of 850 homes, etc. I do not believe that we require any more houses to be constructed. With a UK wide dropping population, the requirement for more homes is not necessary. In regards to the environmental and climatic impact that this development will have, will be catastrophic.</p>	<p>Objection to Strategic Allocation PLA3: Land West of Bridgend</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by the identification of the most appropriate scale of economic growth and housing provision, all of which have been based upon well informed, evidence based judgements regarding need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferred Strategy Strategic Growth Options). A range of growth scenarios across the whole Replacement LDP period have been analysed and discussed within the Strategic Growth Options Background Paper. This has considered how the County Borough’s demographic situation is likely to change from 2018-2033 and informed the most appropriate response for the Replacement LDP. As such the Replacement LDP identifies an appropriate plan requirement to enable a balanced level of housing and employment provision that will achieve sustainable patterns of growth, support existing settlements and maximise viable affordable housing delivery.</p> <p>The distribution of growth is further evaluated and justified in the Spatial Strategy Options Background Paper (See Appendix 43 – Background Paper 3). The strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on Best and Most Versatile (BMV) agricultural land. However, given the existing LDP’s success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and</p>

			<p>deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough's future housing requirements can be realised.</p> <p>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. As such, a Settlement Assessment has been undertaken (See Appendix 19) to establish a sustainable settlement hierarchy. 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.</p> <p>The plan preparation has involved the assessment of 171 sites. Each candidate site has been assessed against the criteria in the Candidate Site Assessment Methodology which was previously consulted upon (See Appendix 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessment, sites were examined based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints and opportunities. Site promoters were asked to prepare and submit a number of technical supporting studies to demonstrate the site's deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed appropriate were included for allocation in the Deposit Plan. As such, candidate site 308.C1 Bridgend (West of) was considered appropriate for allocation.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (See Deposit Policy PLA3 – Page 71). The provision of new residential dwellings, including affordable units, will be incorporated alongside a new one and a half form entry Primary School, recreation facilities, public open space, plus appropriate community facilities all set within distinct character areas.</p> <p>Policy PLA3 will ensure development positively integrate the remains of Llangewydd Church and Churchyard Scheduled Ancient Monument in a manner that preserves and enhances the remains as part of the wider site. Development must also incorporate the Laleston Trail within the central part of the site, providing access to the Bridgend Circular Walk and realigned Public Right of Way. Furthermore, the enclosed byway with the existing hedgerow corridor will be retained as the Y Berth cross link. In terms of active travel, Policy PLA3 requires on-site and off-site measures to provide good quality, attractive, legible, safe and accessible pedestrian and cycle linkages in accordance with Active Travel design. Improved linkages must be provided along the A473, with Bryntirion Comprehensive School and Bridgend Town Centre (including the bus station and train station). New routes should be provided to accord with the proposed routes within the Council's Active Travel Network Maps:INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58, BRC9b.</p> <p>In terms of biodiversity/ecology, an ecological desk study and Extended Phase 1 survey has been undertaken by EDP. The desk study has noted that within the Study Site's zone of influence there are a number of statutorily and non-statutory designated sites present, most notably Laleston Meadows SINC which overlaps with the site itself.</p> <p>Given the combination of designated sites, it is concluded that any future planning submission will need to consider the potential for direct and indirect impacts to arise upon qualifying features, including the Laleston Meadows SINC. However, it is inherent within the emerging masterplan that the Laleston Meadows SINC and its associated designated features will be retained. Furthermore, such retained features will be further protected from potential harm, damage and disturbance through the sensitive design of built development away from SINC boundaries and inclusion of suitable buffers.</p>
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			<p>The desk study confirms that the inclusion of Laleston Meadows SINC within the Study's Site boundary will provide substantial potential for a balanced provision of areas of informal public open space and wildlife zones. When linked with proposed POS and play areas across the developable site this will provide a significant benefit to both visual and recreational amenity, conservation and biodiversity enhancement. In respect of the latter, the SINC provides a potential space to accommodate ecological mitigation and biodiversity enhancements and thus offset ecological impacts that may arise during the development of adjacent land.</p> <p>An Extended Phase 1 survey was undertaken in February 2020, supplemented by further roosting bat works in March 2020. The Phase 1 survey concluded that the site is dominated by agriculturally improved grassland of limited botanical interest and thus of low inherent ecological value. Habitats of greatest ecological importance include the native hedgerows delineating the northern boundary and internal field boundaries in addition to woodland habitat and marshy grassland associated with Laleston Meadows SINC. The roosting bats surveys identified several trees with low to high potential to support a bat roost whilst onsite ponds have been considered for their potential to support great crested newt.</p> <p>The results of the desk study and Extended Phase 1 survey have influenced the masterplan which has sought to locate development across those habitats of predominantly limited ecological value whilst retaining boundary habitats as far as possible. Where retained, such features have been accommodated within proposed informal green space and sustainable transport links, which ultimately enhances connectivity throughout the Site and contributes to the wider green infrastructure resource.</p> <p>Where avoidance is not possible, however, and will result in the loss of internal field boundaries (albeit predominantly species-poor or defunct), the site is considered to be of sufficient size and extent to enable future development proposals to flexibly avoid and/or mitigate for any significant ecological constraints and compensate where necessary. This will be in addition to the sensitive positioning of built development away from retained boundary features to minimise damage.</p> <p>The report also highlights further detailed habitat and species surveys which are recommended to inform a planning application and ensure proposed mitigation is appropriate and proportional. These include a Dormouse survey, which was raised in comments received from NRW. Policy PLA3 will require the development to retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland) and Laleston Meadows SINC, which includes the green space bordering the northern and north-western boundaries of the site. PLA3 will also require the developer to submit and agree ecological management plans including proposals for mitigation, enhancement and maintenance for retained habitats and protected species (including for bats and dormouse) and provide appropriate compensatory and replacement habitat.</p> <p>Policy PLA3 will require development to incorporate the Laleston Trail within the central part of the site, providing access to the Bridgend Circular Walk and realigned Public Right of Way. Additionally, PLA3 requires 4.1 hectares of retained green infrastructure and new areas of public open space across the site comprising seven key areas of formal open space (including 0.5ha of equipped play provision), informal spaces and linkages, green streets, and explore the provision of enabling sensitive public access to part of Laleston Meadows SINC and woodland.</p> <p>The proposed allocation is supported by detailed masterplanning work, including an illustrative block plan to identify a realistic dwelling yield on the site's net developable area. The Transport Assessment reflects the number of dwellings the site is expected to deliver. This identifies the various transport issues relating to the proposed development, and, in combination with the Strategic Transport Assessment, what measures will be taken to deal with the anticipated transport impacts of the scheme. Proposed Policy PLA3 prescribes the appropriate development requirements in relation to all forms of travel. For the avoidance of any doubt, this</p>
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			<p>number of dwellings does not require the original proposed site boundary to be expanded, rather more efficient use of the existing net developable area. The density and mix of uses proposed is considered appropriate to support a diverse community and vibrant public realm, whilst generating a critical mass of people to support services such as public transport, local shops and schools. In accordance with national planning policy, higher densities should be encouraged in urban centres and near major public transport nodes or interchanges. Given the site's location within the Primary Key Settlement of the County Borough and the proximity to Bridgend Town Centre, this density level is therefore considered appropriate to foster sustainable communities, further bolstered by the proposed enhancements to the active travel network.</p> <p>The Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and expanding upon the current active travel routes as identified in the Existing Route Maps. Consideration of active travel has been key during the master planning of strategic sites in the County Borough. Reference to the Active Routes detailed in Policy PLA3 in conjunction with Policy PLA12 should be considered essential in the delivery of any strategic site or any proposal, ensuring that development is contributing to the promotion of a sustainable and healthy lifestyle.</p> <p>The Active Travel Network Maps aim to improve access to key services and facilities including town centres, employment sites, retail areas and transport hubs, improved access to education facilities such as schools and colleges and improvements to, and expansion of, the existing strategic cycle network in the County Borough. Opportunities will be maximised to further improve upon these routes, providing walking connections which will allow integration between new developments and existing communities.</p> <p>Whilst developments should be encouraged in locations which reduce the need to travel and promote the use of sustainable transport, the Council recognises that any development growth will likely result in greater travel demand, and that increased traffic levels and congestion is likely to occur if appropriate mitigating transport measures and infrastructure are not delivered. Therefore a Strategic Transport Assessment (See Appendix 36) has been undertaken to consider the impact of plan proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals. The technical notes accompanying this assessment demonstrate that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation.</p> <p>Furthermore Strategic Policy 5: Sustainable Transport and Accessibility will ensure that development must be located and designed in a way that minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, education, local services and community facilities. Development will be required to deliver, or contribute towards the provision of, active travel scheme, public transport measures, road infrastructure, and other transport measures, in accordance with the Bridgend Local Transport Plan and the Bridgend Integrated Network Plan (See Appendix 29).</p> <p>Proposed Policy PLA3 prescribes a number of placemaking principles for Land West of Bridgend, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. Such requirements include pursuing transit-orientated development that prioritises walking, cycling and public transport use, whilst reducing private motor vehicle dependency. Well-designed, safe walking and cycling routes must be incorporated throughout the site to foster community orientated, healthy walkable neighbourhoods. There will be a clear emphasis on providing safe pedestrian and cycling linkages along the A473, with Bryntirion Comprehensive School and Bridgend Town Centre (including the bus station and train station). New routes should be provided to accord with the proposed routes within the Council's Active Travel Network Maps: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58 and BRC9b. PLA3 will also require development to provide a new shared cycle / footway on the northern side of the A473, connecting the site with active travel route INM-BR-57 linking to the shops at Bryntirion to the east, and a widened footway to the west of the site to provide a connection to the eastbound bus stop on the A473.</p>
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			<p>Policy PLA3 will require on-site highway improvements to ensure the principal point of vehicular access is achieved from a new signalised junction with the A473 at the southern boundary; the junction will accommodate a new-shared use crossing to connect the internal cycleway/footway with the existing active route BRC9b on the southern side of the A473.</p> <p>Additionally, a future planning application must be accompanied by an 'Energy Masterplan' that demonstrates that the most sustainable heating and cooling systems have been selected. This should include consideration of the proposed system as a whole, including the impact of its component materials on greenhouse gas emissions. The Renewable Energy Assessment identifies this site as suitable for installing a new District Heat Network. If this development requirement is proven to be financially or technically unviable then development proposals must follow the sequential approach to identify low carbon heating technologies in accordance with ENT10.</p> <p>Furthermore, the Council have prepared a Sustainability Appraisal (SA) to inform the Replacement LDP (See Appendix 9) of which was carried out to identify the likely significant environmental and wider sustainability effects from the Deposit Plan. It also considers whether any mitigation and enhancement measures should be incorporated within the Replacement LDP to ensure the avoidance of likely significant adverse effects and to enhance the effectiveness of the plan. The findings of the SA indicate that the proposed development with its proposed range of land uses will likely produce a wide range of significant beneficial effects.</p>
145	<p><u>SP2 (2) Land south of Bridgend (Island Farm) – 847 units</u></p> <p>Water supply</p> <p>Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.</p> <p>Sewerage network</p> <p>Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.</p> <p>The site is traversed by a 225mm foul public sewer for which protection measures will be required in the form of an easement width or diversion.</p> <p>Wastewater Treatment Works (WwTW)</p>	No changes proposed.	<p>Comments noted. SP10 references that all development proposals must be supported by sufficient existing or new infrastructure, specifically referencing utilities. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Replacement LDP progresses and at planning application stage.</p>

There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development.

SP2 (3) Land west of Bridgend – 810 units

Water supply

Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.

Sewerage network

Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.

Wastewater Treatment Works (WwTW)

There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development.

SP2 (4) Land east of Pencoed – 770 units

Water supply

Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.

	<p>There is a 200mm distribution main and a 250mm trunk main traversing the site for which protection measures will be required in the form of easement widths or diversions.</p> <p>Sewerage network</p> <p>Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.</p> <p>There are three sewers and a rising main traversing the site for which protection measures will be required in the form of easement widths or diversions – these are a 100mm combined rising main, a 150mm combined sewer, a 300mm combined sewer and a 525mm combined sewer.</p> <p>Wastewater Treatment Works (WwTW)</p> <p>There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development.</p>		
434	<p>Land east of Pencoed has been identified as a location for 770 residential units including affordable housing; a new primary school and nursery facility; outdoor recreational facilities as well as active travel routes and community facilities. Having spoken to a number of residents, concerns have been raised relating to the current capacity of local services such as the GP surgeries and dental services. It will be important that relevant stakeholders such as Pencoed Town Council and the county borough hold a review of current services and infrastructure and identify where there needs to be improvement in order to facilitate the increase in population as a result of the additional residential properties. As the replacement LDP highlights, the land east of Pencoed has been identified as a potential location for a</p>	<p>Comments regarding Strategic Allocation PLA4: Land East of Pencoed, amenities and facilities within Pencoed, health care facilities, primary school, Moratorium</p>	<p>Comments noted. The Deposit Plan has been underpinned by the identification of the most appropriate scale of economic growth and housing provision, all of which have been based upon well informed, evidence based judgements regarding need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferred Strategy Strategic Growth Options). A range of growth scenarios across the whole Replacement LDP period have been analysed and discussed within the Strategic Growth Options Background Paper. This has considered how the County Borough’s demographic situation is likely to change from 2018-2033 and informed the most appropriate response for the Replacement LDP. As such the Replacement LDP identifies an appropriate plan requirement to enable a balanced level of housing and employment provision that will achieve sustainable patterns of growth, support existing settlements and maximise viable affordable housing delivery.</p> <p>The distribution of growth is further evaluated and justified in the Spatial Strategy Options Background Paper (See Appendix 43 – Background Paper 3). The strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on Best and Most Versatile (BMV) agricultural land. However, given the existing LDP’s success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and</p>

<p>primary school. It is incredibly disappointing that the council has not indicated as to whether or not this will be an English medium or Welsh medium school. Depending on the decision, it could have a further impact on traffic in the town given that if the primary school is English medium, it would likely feed into Pencoed comp. Further, I have been vocal over the past 2 – 3 years about the lack of Welsh medium education provision in the county borough, especially in the Pencoed area. I would press on the council to ensure that the potential primary school is a Welsh medium school as there are already 2 English medium primary schools in Pencoed and the lack of provision of Welsh medium education in the wider county is shameful. We only need to look at recent cases in Pencoed to see that the current system is failing parents. These parents are now facing the decision of sending their children even further away to receive their education in Welsh, or to opt for English medium education. There's a fundamental question of fairness here? Why should children in Pencoed need to travel to receive their education in Welsh? A town the size of Pencoed should have a Welsh medium primary school. Moving on, it is welcome that the draft LDP suggests that the moratorium on developments west of the railway will remain in place. I want to emphasize the point that residents feel that this moratorium should remain for the duration of this plan period, even if the Penprysg road bridge is replaced during the plan period. However, it's important that the current bottleneck on Hendre road is resolved before we see the Penprysg bridge replaced. A significant amount of residents have expressed their desire for the road to be widened, especially the section of the road between Heol Wastadwaun and Min-y-nant. I would welcome further consideration to what happens to the town centre once the crossing is closed. There is scope for regeneration around the cenotaph which I'm sure would be welcomed by residents. I would like to welcome the provision of</p>		<p>deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough's future housing requirements can be realised.</p> <p>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. As such, a Settlement Assessment has been undertaken (See Appendix 19) to establish a sustainable settlement hierarchy. 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.</p> <p>The plan preparation has involved the assessment of 171 sites. Each candidate site has been assessed against the criteria in the Candidate Site Assessment Methodology which was previously consulted upon (See Appendix 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessment, sites were examined based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints and opportunities. Site promoters were asked to prepare and submit a number of technical supporting studies to demonstrate the site's deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed appropriate were included for allocation in the Deposit Plan. As such, candidate site 219.C1 was considered as appropriate for allocation.</p> <p>As part of the proposed allocation of Land East of Pencoed, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (See Deposit Policy PLA4 – Page 75). The provision of new residential units, including affordable dwellings, will be incorporated alongside a new 1.5 form entry primary school, recreation facilities, public open space, plus appropriate community facilities and commercial uses.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced. The IDP 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. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p> <p>In terms of health, the Council has also been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations with the Deposit Plan progress.</p> <p>In relation to education, should PLA4: Land East of Pencoed development be adopted within the new Local Development Plan, a decision on language type for the primary provision (ie whether the school is Welsh or English-medium) would be undertaken in due course.</p> <p>In terms of the moratorium, Background Paper 16: Development West of the Railway Line, Pencoed, makes use of several recent studies focussed on the highway network in Pencoed to determine the requirement for the existing moratorium on development, as prescribed by Policy PLA6 in the Bridgend Local Development Plan, to be retained in the emerging replacement Local Development Plan 2018 to 2033. It has been identified that significant assessment has been undertaken into developing a solution which is likely to require major</p>
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	<p>greenspaces in the area. However I would be interested to know as to whether consideration has been given to use the land known locally as the 'old brickyard' for green space development? I note the planned expansion of the Park and Ride facilities, however there will be land left over on the 'Old brickyard' that could be turned into a small park for the benefit of the community.</p>		<p>interventions to include the closure of the Hendre Road level crossing as well as a replacement Penprysg Road bridge with significantly improved capacity and active travel infrastructure. However, the available solutions are subject to many constraints which would need to be overcome through further assessment and design and will require collaboration of several statutory undertakers. There are also restrictions in terms of funding, with no existing guarantees that the required costs for major intervention can be met over the replacement plan period. It is therefore concluded that the existing development moratorium in Pencoed should be retained within the revised Local Development Plan 2018-2033 until a suitable transport intervention materialises.</p> <p>The Council is currently carrying out an initial public consultation on the Pencoed level crossing and Penprysg road bridge, of which will allow members of the public and other stakeholders to voice their views and/or concerns.</p> <p>Whilst the replacement LDP Policy PLA8 (5) allocates and safeguards land for the expansion of the existing park and ride facility at Pencoed, no definitive plans have been worked up as of yet. However, such future development will provide opportunities for effective interchange between active travel, public transport and cars to facilitate a reduction in the length and number of car-borne journeys, especially for the journey to work. Providing for convenient and efficient interchange between transport modes is vital for making sustainable travel options more attractive and practical to residents.</p>
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Title: Do you have any comments to make on the Deposit Replacement LDP?			
ID	Comment	Summary of changes being sought/proposed	Council response
1370	<p>In regards to the extensive archaeological landscape that will be affected by such a development, can only be described as significant.</p>	<p>Concerns regarding affects of development on archaeological landscape.</p>	<p>The Replacement LDP is accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive component within the Plan (strategy, policies, site allocations, etc.) and any identified reasonable alternatives. This builds directly upon previous SA reporting including an SA Scoping Report (2018) and an Interim SA Scoping Report (2019) which accompanied the Replacement LDP Preferred Strategy. The Deposit Plan SA Report demonstrates how the SA, incorporating SEA, process has informed the development of the Deposit Plan, including the incorporation of recommended changes within the document. As a result, the SA Report concludes that there is good coverage of all key sustainability issues in Deposit Plan, with plan components performing well against the SA Framework. It also identifies strong compatibility between the LDP Vision/Objectives and the SA Framework, plus no likely significant adverse effects (taking account of mitigation in all its forms).</p> <p>In accordance with statutory requirements, Planning Policy Wales sets out multiple requirements for development to avoid direct adverse effects on nationally important heritage assets and for the need for any development resulting in adverse effects on the historic environment to be robustly justified. There is also a general presumption in favour of the preservation or enhancement of listed buildings and their settings, along with a requirement for development not to result in direct adverse effects on Scheduled Monuments, unless there are exceptional circumstances. These issues are grouped under 'Cultural Heritage', which is one of the 14 Sustainability Objectives considered by the SA. The potential for adverse impacts on Cultural Heritage was and is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed.</p> <p>All Stage 2 Candidate Site Sites were considered to ascertain whether they had the potential to cause an adverse impact upon the historic environment. To facilitate this assessment, the Council consulted with the Glamorgan-Gwent Archaeological Trust (GGAT) early on in the process for their views on the likely range of impacts on the historic environment along with recommendations for mitigation. Any identified impacts were required to be mitigated by site promoters.</p>

			<p>For Land West of Bridgend (PLA3) the SA identified the potential for adverse impacts due to the proximity of the site to scheduled monuments and important archaeological sites. However, the requirements under SP2 (for each strategic site allocation to be supported by a detailed masterplan) and PLA3 (for the proposed strategic site allocation to implement specific masterplan development principles) represent forms of mitigation to help address the identified likely significant effects. These requirements also enhance the sustainability performance of the strategic site allocation more generally. The SA identifies relevant masterplan development principles included in these spatial development policies to help ensure the avoidance of likely significant adverse effects which could otherwise occur from this development proposal. Additional masterplan development principles are also included within Policy PLA3 to ensure site applies Good Design principles and a Sustainable Placemaking approach to siting, design, construction and operation in accordance with Planning Policy Wales. These principles were informed by SA findings and have been incorporated into the final Deposit Plan, with SA site assessment scoring updated to reflect their inclusion in the Deposit Plan.</p> <p>Further to this, the site promoter commissioned EDP to undertake an Archaeological and Heritage Assessment. The assessment establishes that the site does not contain any World Heritage Sites, Scheduled Ancient Monuments, listed buildings, registered historic parks and gardens or historic landscapes, where there would be a presumption in favour of their physical preservation in-situ and against development. In terms of archaeological remains, the site is identified as having moderate to high potential to contain remains from the medieval period, particularly in its northern extremity, which is adjacent to the site of the former Llangewydd Church. However, the land is a SINC and will not be developed. Policy PLA3 will require development to positively integrate with the remains of Llangewydd Church and Churchyard Scheduled Ancient Monument in a manner that preserves and enhances the remains as part of the wider site.</p> <p>While there is a small amount of evidence for late prehistoric and Roman activity in the surrounding 1km study area, the potential for archaeology of these periods within the site is deemed low. Post-medieval settlement was focused elsewhere in the locality and any archaeology of this period within the site is most likely to relate to agriculture. Overall, the baseline data indicate that the probability of significant archaeology being present is low. Any further archaeological investigation can reasonably be secured through an appropriately worded planning condition appended to a planning permission.</p> <p>Potential impacts upon the setting of historic assets in the locality have focused on the 1km study area. No significant effects arising from changes to setting have been identified for scheduled monuments, listed buildings and registered parks and gardens. In respect of the Laleston Conservation Area, there will also not be any significant changes to its visual setting. It is acknowledged that development in the southern part of the Site will remove a part of the agricultural landscape around Laleston which forms a buffer from Bryntirion to the east. However, agricultural land will remain on all sides around Laleston, which will retain its character as a discrete settlement, while landscaping measures associated with the development will mitigate any impression of coalescence. This is assessed as an impact of a minor order, with the special interest of the conservation area being retained. Policy PLA3 will require development to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p> <p>The site promoter also commissioned EDP to undertake a Landscape and Visual Appraisal (LVA). The purpose of the appraisal was firstly to inform the design evolution of the scheme which enabled an integrated approach to potential landscape and visual opportunities and constraints.</p> <p>The LVA outlines that there are adverse and beneficial landscape effects resulting from development of this site. However, the embedded mitigation and the approach to design is considered to minimise adverse effects over</p>
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			<p>time as the proposed landscape establishes and overall the predicted effects are not considered unacceptable from a landscape and visual perspective in the context of the delivery of a strategic housing site.</p> <p>The appraisal included a review of national and local policy, landscape character and visual amenity. The appraisal included assessment of the National Landscape Character Assessment (NLCA), LANDMAP, and Landscape Character Assessment for Bridgend County Borough (LCABC) (2013) in addition to an on-site assessment. The appraisal confirms that the site relates well both in landscape and visual terms to the existing landscape and settlement, and that the site represents a logical extension to Bryntirion provided a considered design is sensitive to the site's existing characteristics. The design appraised responds sensitively to assets on site such as the Bridgend Circular Walk, the byway, the hedgerow network and vegetated site boundaries. As such the proposals put forward at this stage are considered to be a thoughtful and easily assimilated future development of this site.</p> <p>Mitigation measures include:</p> <ul style="list-style-type: none">• The Laleston Meadows SINC would be brought into regular long-term management. This would protect the visual amenity and landscape character of this northern part of the site. A landscape buffer would set development back from the SINC, and dwellings would front onto it. The SINC could be used as a mitigation receptor site (in ecological terms) and the grazed fields currently within the SINC could be improved by the proposals as well as maintained in the long term. The SINC offers a great opportunity for informal and natural play on site provided increased public access would not clash with its ecological function;• The site contains very few of the key characteristics listed in the published documents on Laleston SLA. The site has a strong network of hedgerows, some which would be lost and the field pattern replaced by urban form. However, the retained hedgerows and trees would be protected by landscape buffers and some of the character of the SLA within which the site lies would be retained;• Provision of structural landscaping, a mix of native and non-native trees and shrubs proposed throughout the site for biosecurity, diversity of ecosystems and habitat creation as well as the visual amenity of future residents. Areas of open space would be bolstered by considered structural planting to create an aesthetically pleasing urban development which is well integrated with the proposed landscape strategy and the settled landscape character currently experienced in the local area;• Retention of existing landscape features (hedgerows and trees) is a priority of the emerging proposals as it forms a desirable strong green framework that links with the wider green infrastructure to the north, west and south of the site;• Adequate replacement planting of local species in appropriate locations to compensate for any loss of trees and hedgerows, and enhancement planting; and• The location of public open space, public footpaths and the street-alignment has been designed to protect and reflect local character. <p>Through consideration of the findings above, it is anticipated that any notable landscape and visual effects resulting from the addition of the proposed scheme would be localised in extent and contained within a c.400m radius of the site, despite the site's relatively open character.</p> <p>Overall it is considered that the masterplan framework proposed for the site has been sensitively designed through a landscape and ecology-led approach, with appropriate incorporation of mitigation measures in order to address concerns of the site in relation to landscape and visual matters. As such, the promotion of this site for residential development should be considered an acceptable extension to the existing settlement of Bryntirion which would not cause significant or wide-ranging adverse effects upon its surrounding landscape context.</p> <p>Policy PLA3 will ensure that the design and layout of the site has regard to the landscape in which it sits, considering the interface between the site, Bridgend and Laleston. Visual impacts must be minimised through</p>
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			the inclusion of mitigation measures and provide links with the existing landscape and access features to safeguard landscape character whilst creating a sense of place. The development must also not be to the detriment of the Special Landscape Area and any development proposal must incorporate measures to reduce adverse effects and/or visual intrusion on the wider landscape.
141	<p>Thank you for consulting us on this document. As we have noted previously in response to consultations, the historic environment forms an important part of Bridgend CBC's area, and includes statutorily designated historic assets of both areas and structures, as well as non-designated historic assets. The range of these includes areas such as the Mesolithic flint scatters at Merthyr Mawr Warren, shrunken Medieval villages, and the historic core of Bridgend, with its Medieval bridge, castle and church, industrial minerals extractive and transporting landscapes, RAF Stormy Down, as well as information on isolated finds of all periods, all of which contribute to the distinctive heritage and current form of the area.</p> <p>We are also able to provide information on the policies and procedures that have been adopted for development in other local authorities: for Bridgend, eleven areas have been delineated as Archaeologically Sensitive Areas in an Archaeology and Archaeologically Sensitive Areas SPG which has been supplied to you in draft in 2017 and as far as we are aware, is still awaiting approval.</p> <p>The historic environment should not be seen as any constraint to development, but viewed with the Well-being of Future Generations (Wales) Act, contribute substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals.</p> <p>The Deposit plan includes SP18 Conservation of the Historic Environment and as Strategic Objective 4 recognises the range of historic assets, both designated (protected as Scheduled Monuments or Listed Buildings) and non-designated, and the need to both protect and preserve these</p>	<p>Include the number of non-designated historic assets recorded in the Historic Environment Record, in the supporting text to Policy SP18</p>	<p>Comments are noted. The supporting text to Policy DNP10 at paragraph 5.5.98 of the Replacement LDP (See Appendix 1) advises applicants of the need to consult The Historic Environment Record and Glamorgan Gwent Archaeological Trust at an early stage in considering their development proposals. For this reason, it is not considered necessary to further clarify the number of non-designated historic assets recorded in the Historic Environment Record.</p>

	<p>as part of Bridgend's heritage. Understanding these as a resource will contribute to a better appreciation, both from a development management viewpoint and also as keyed in with the well-being goals.</p> <p>The Deposit notes the numbers of designated historic assets, and mentions other historic assets, but should also include the number of non-designated historic assets recorded in the Historic Environment Record, which is partly maintained by your Authority, of which there are at least currently 1,800 datapoints, and 2,190 NMR/RCAHMW datapoints.</p> <p>DNP10: Built Historic Environment and Listed Buildings notes that there are historic buildings in the UA area which are not statutorily protected and these are of importance also, retaining historic information. Legislation and Policy relating to the historic environment is noted; and the impact of proposed development, and also the impact of change, on the historic environment is recognised. If you have any questions or require further advice on this matter, please do not hesitate to contact us.</p>		
409	<p>Bridgend Replacement Local Development Plan</p> <p>Thank you for providing us with this opportunity to comment on the Bridgend Replacement Local Development Plan. This email forms the basis of our response to this consultation request. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p>	No changes proposed	Comments noted

<p>Relevant Policies:</p> <p>SP5: Sustainable Transport and Accessibility</p> <p>PLA7: Development West of the Railway Line, Pencoed</p> <p>New development that generates a net increase in vehicular movement will exacerbate congestion either side of the level-crossing and at the complex over-bridge junction between the eastern end of the relief road and Penybont Road.</p> <p>PLA8(3) Improvements to the capacity of the Maesteg – Bridgend railway line</p> <p>PLA8(5) promotes the expansion of the existing park and ride facilities at Pencoed rail station</p> <p>PLA8(6) supports the expansion of the existing park and ride facilities at Pyle rail station.</p> <p>SP3: Good Design and Sustainable Place Making</p> <p>PLA5 - Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area</p> <p>A new pedestrian and cycle bridge over the existing railway line and along A48/Pyle Road</p> <p>Pyle Railway Station (approximately 4.5 miles to the north of the site) to be redeveloped as a transport hub. This would entail relocating the existing railway station to Land East of Pyle (PLA5) and incorporating extended park and ride facilities to improve links to Porthcawl as a pivotal terminus.</p> <p>Network Rail is a statutory consultee for any planning applications near relevant railway land and for any development likely to result</p>		
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<p>in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. With this in mind any planned future development (both residential and employment) should take into account any adverse impact on railway. This might be an increase in the use of an existing level crossing. It could be that the predicted growth, may increase future demands at nearby stations which may, in turn, necessitate the need for enhancements to existing facilities such as waiting rooms, toilets and parking. Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>Level Crossings</p> <p>Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. Network Rail has a strong policy to guide and improve its management of level crossings, which aims to: reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users/stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any</p>		
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<p>future development impacts on the safety and operation of any of the level crossings listed above. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p> <p>Level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none">• By a proposal being directly next to a level crossing• By the cumulative effect of development added over time• By the type of crossing involved• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing• By developments that might impede pedestrians ability to hear approaching trains• By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing• By any development or enhancement of the public rights of way It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions. <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-</p>		
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	<p>(Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that "...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway" (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval. We would appreciate the Council providing Network Rail with an opportunity to comment on any future planning policy documents. We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy. We trust these comments will be considered in your preparation of the forthcoming Plan documents.</p>		
139	<p>Strategic Allocations</p> <p>It is noted that in order to enable the implementation of the Growth and Spatial Strategy, Deposit RLDP Policy SP2 'Regeneration Growth Area and Sustainable Growth Area Strategic Allocations' identifies a number of strategic allocations where growth will be focused. These include housing allocations in the Maesteg and the Llynfi Valley Regeneration Growth Area and Strategic Allocation SP2(5) Land East of Pyle in the Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area. Deposit RLDP Policy SP2 requires each of the Strategic Allocations to be developed in line with site specific policies and associated masterplan development principles set out within the RLDP (Policy PLA5 'Land East of Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area') and says that a detailed masterplan will need to be developed in line with this and agreed with the Council prior to development commencing. NPTC is supportive of the requirement within Policy SP2 for each strategic allocation to develop a masterplan and for it to be agreed with the</p>	<p>Support requirement for strategic site allocations to be supported by a Masterplan</p>	<p>Comments noted</p>

	<p>Council prior to the development commencing.</p> <p>Given the location of the proposed site allocation, NPTC would welcome the opportunity to comment on the Strategic Transport Assessment and further involvement in future discussions about the site.</p> <p>In respect of Gypsies, Travellers and Showpeople, NPTC notes that BCBC's approach to meet all identified needs is in accordance with the duty placed on the Council through the Housing (Wales) Act 2014 to meet all identified need. In accordance with Part 3 of the Housing (Wales) Act 2014, NPTC are currently in the process of undertaking its Gypsy and Traveller Accommodation Assessment (GTAA) to assess the future accommodation of the Gypsy and Traveller Community and determine whether there is a requirement for additional site provision within NPT for permanent residential pitches and/or transit pitches in the short term and up to 2036. It would be beneficial for such studies to be considered on a wider basis and NPT would welcome future collaboration on this topic.</p>		
408	<p>Please accept this letter from my office as a submission to the aforementioned consultation.</p> <p>Throughout June, I received numerous requests from constituents for assistance in participating in the consultation process. I note from Bridgend County Borough Council's (BCBC) social media that residents were encouraged to participate online and submit their feedback directly. As one of the two MPs whose constituencies would be affected, I aimed to facilitate this process by advertising the proposed revised local development plan (RLDP) to constituents via my social media platforms and letters as well as hosting three public meetings and four advice surgeries. I hope my efforts have helped to increase the</p>		<p>It is the view of the Council that the overall objectives of the Community Involvement Scheme (CIS) as originally set out in the approved Delivery Agreement (See Appendix 5), have been met. It is also considered that the LDP has been prepared in accordance with the LDP 'Preparation Requirements' set out in the Development Plans Manual (Edition 3).</p> <p>The Council previously consulted the public on the Preferred Strategy which was held from 30th September to 8th November 2019. Following the public consultation period, the Council was required to consider all representations made in accordance with LDP Regulation 16(2) before determining the content of the deposit LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Preferred Strategy & Initial Consultation Report) for publishing. This report was subsequently signed off by members of Council.</p> <p>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake Deposit public consultation for a statutory period of 6 weeks, however the Council made an allowance for 8 weeks in order to maximise public participation. This was to ensure a range of views could be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were used to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included:</p> <ul style="list-style-type: none"> • A Legal Notice was placed within the Glamorgan Gazette on 3rd June 2021

<p>number of responses you receive and thank you in advance for considering my comments. Feedback on specific proposals were made using the online form on the website. However, I hope you will also consider some additional feedback I've summarised below.</p> <p>The Consultation Process</p> <p>Following meetings with Councillors, stakeholders and residents, I wrote to you on the 21st July, along with multiple co-signatories, requesting a delay to the 27th July deadline. I would like to reiterate some of the points made in that letter as they were a source of deep concern and frustration for a large number of people with whom I spoke.</p> <p>Considering the importance of the RLDP, it has been challenging to facilitate sufficient levels of engagement in the allotted time, and the COVID pandemic has undoubtedly increased these difficulties. For a plan that will affect our entire Borough until 2033, it seems unreasonable that a little extra time couldn't be provided considering that pandemic restrictions are now being relaxed across the UK, including Wales. As outlined in previous correspondence, accessibility has been an issue of deep concern. Elderly and vulnerable residents without the necessary digital competence, connectivity or equipment were at a distinct disadvantage to participate in the consultation process. I believe this amounts to disenfranchising a significant number of people and therefore urge you to consider the request for additional time as a matter of urgency. If this request cannot be considered until after the consultation has ended, then I ask that in the alternative an additional consultation be held so that we can address this serious issue. Should the opportunity to have additional time be made available, I'm confident that it will greatly increase the public's confidence in the process by allowing elected representatives to carry out the remaining works necessary</p>		<ul style="list-style-type: none"> • The package of consultation documents were made available online via Bridgend County Borough Council's Website. Respondents were able to complete an electronic survey online to make a formal representation. • Printed reference copies were placed within Council buildings, including every library in the County Borough (fixed and mobile), subject to social distancing guidelines. The reference copies were also available to view at the Council's Civic Offices, by appointment only as the offices had not re-opened to the public due to the pandemic. Hard copies of the survey form were also made available at these locations for members of the public to complete by hand. • Dissemination of hard copies of information to individuals. Members of the public were able to request a copy of the survey by post to complete by hand (free of charge). There was a £25 charge for a hard copy of the whole Deposit Plan to cover printing and postage costs for such a large document. • Every individual and organisation on the LDP Consultation Database was notified by letter or email to inform them of the availability of the Deposit Consultation. Approximately 500 representors were contacted, provided with details of how to access the package of consultation documents and how to respond. As the consultation progressed, additional representors were informed of and added to the database upon request. • Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in the County Borough. • A comprehensive social media plan was devised. A series of social media posts were released periodically on Facebook, LinkedIn and Twitter. They drew attention to different thematic areas / parts of the County Borough throughout the consultation period. • Planning Officers have presented the consultation remotely to established working groups, including the Bridgend Community Cohesion and Equalities Forum and Youth Forum. • In place of face to face public drop-in sessions, representors were able to book one-to-one telephone appointments with planning officers to discuss any queries/concerns they may have had. • Posters were sent to all Town and Community Councils to display on their notice boards. <p>The distribution of growth is evaluated and justified in the Spatial Strategy Options Background Paper (See Appendix 43 – Background Paper 3). The strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on Best and Most Versatile (BMV) agricultural land. However, given the existing LDP's success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough's future housing requirements can be realised.</p> <p>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. As such, a Settlement Assessment has been undertaken (See Appendix 19) to establish a sustainable settlement hierarchy. 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.</p> <p>The preparation of the Replacement LDP has involved the assessment of 171 sites. Each candidate site has been assessed against the criteria in the Candidate Site Assessment Methodology which was previously</p>
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<p>to ensure sufficient engagement. Moreover, it will allow BCBC an opportunity to write to all residents with details of how to view the proposed RLDP and submit feedback which will ensure that public awareness is at the levels necessary to produce a credible, trusted outcome.</p> <p>Location of Residential Developments</p> <p>It appears that BCBC intends to achieve its new housing target (5000+ residential units) by allowing circa 80% of those to be built in the Bridgend constituency part of the Borough. As the MP for this area, I must object to this on the grounds that this places the area at serious risk of over-development. There appear to be huge areas of open spaces in other parts of the Borough which could easily accommodate new housing, but presumably for reasons related to land value, BCBC has chosen candidate sites predominately south of the M4 but including Pyle/Cornelly.</p> <p>Impact of New Residential Units</p> <p>Much of the feedback I've received is in relation to the addition of thousands of new homes to already highly populated areas. The vast majority of residents informed me that whilst they in favour of building homes there are deep concerns about the impact on local services, infrastructure and traffic. Schools, hospitals, GP surgeries, dentists, green spaces, parks, leisure facilities, shops, pubs, restaurants etc were all flagged as under intense pressure to maintain facilities to meet current demand, or in some cases lacking suitable facilities altogether. There appears to be little to no clear evidence from the plan that these important amenities would be developed alongside new residential units. Our area needs more than just houses, pavements and streets – the brick-and-mortar buildings we inhabit are more than just dwellings, reflecting real lived experiences of the surrounding locality. When we have endemic social issues like loneliness and</p>		<p>consulted upon (See Appendix 13 – Candidate Sites Assessment Report (2020)). During Stage 2 of the detailed assessment, sites were examined based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints and opportunities. Site promoters were asked to prepare and submit a number of technical supporting studies to demonstrate the site's deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>In terms of Strategic Development Sites, Policies PLA1-PLA5 detail the site-specific requirements including masterplan development principles and development requirements, all of which seek to contribute and address the identified key issues and drivers identified through the Replacement LDP preparation process. Sites will be required to deliver affordable housing, education provision, recreation facilities, public open space, active travel provision plus appropriate community facilities.</p> <p>Policies PLA1-PLA5 (See Deposit Plan – Page 62) detail the site-specific requirements for the mixed-use Strategic Development Sites in Regeneration Growth Areas and Sustainable Growth Areas. Such requirements include masterplan development principles and development requirements all of which seek to contribute and address the identified key issues and drivers identified through the Replacement LDP preparation process. This will be facilitated through the provision of affordable housing, on-site education provision, public open space and active travel provision.</p> <p>Development of this scale (sustainable urban extensions) is necessary to create sustainable communities that will incorporate a mix of complementary uses and deliver improvements to existing infrastructure and/or provide new supporting infrastructure. The latter factor is particularly notable given the school capacity issues across the County Borough and the need for new strategic sites to be significant enough in scale to support provision of a new primary school as a minimum.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP 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. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p> <p>In terms of GP surgeries, the Council has been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan progress.</p>
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	<p>depression, social infrastructure becomes a major part of the equation for good town planning. Institutions like community groups, whether they are the Scouts, Girlguiding, Women's Institutes, Rotary, Charities and Voluntary Associations, Sports-teams, Churches, or pubs, cannot just be artificially created. Indeed, it was residents from the Broadlands and recently developed Parc Derwen estates who conveyed the greatest frustration at perceived failings from planners to ensure there were enough local amenities (in particular school places in the case of Parc Derwen) to ensure that their estates were communities, not just a collection of houses. I appreciate the plan references such facilities, but the experiences relayed at public meetings, and on social media from residents, in particular has created strong feelings of anxiety about the future of many of the towns and villages in the Borough.</p>		
145	<p>Drainage and Wastewater Management Plans</p> <p>Whilst not necessarily a matter for consideration at the current time, Welsh Water (along with all Water and Sewerage Companies in England and Wales) is embarking on the preparation of a Drainage and Wastewater Management Plans (DWMP), which will become statutory documents in the next few years.</p> <p>DWMPs will play a key role in delivering a holistic, prioritised approach to the management of our drainage and sewerage networks in the years ahead and will complement the overall planning framework, including the NDF, SDP and LDPs.</p> <p>To maximise the potential benefits, we will want to work very closely with LPAs (as well as other Council departments) in the preparation of our DWMPs. We hope that through such close collaboration, our DWMPs will be able to anticipate future demands on our networks, including potential 'pinch points', so that we can look</p>	<p>Highlight forthcoming Drainage and Wastewater Management Plans</p>	<p>Comments noted – the Council acknowledges Drainage and Wastewater Management Plans are forthcoming and will liaise with Dŵr Cymru Welsh Water regarding future implementation.</p>

	<p>for ways of overcoming them. As such, we would welcome a mention of the DWMP within the LDP if possible.</p> <p>We hope that the above information will assist you as you continue to progress the Replacement LDP and would encourage the LPA to continue to liaise with Welsh Water at each stage of the process.</p>		
142	<p><u>Category C - Monitoring Framework</u></p> <p>The Council's monitoring framework provides a good starting point and it is clear the authority has considered the monitoring and review Chapter of DPM (Ed. 3), which will need to be refined through the examination sessions. The Welsh Government will work the LPA on the content of the monitoring framework as the plan progresses through the examination.</p> <p><u>Statement of General Conformity</u></p> <p>The Welsh Government is of the opinion that Bridgend's Replacement Local Development Plan (2018-2033) is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).</p> <p><u>Reasons</u></p> <p><i>Scale of growth:</i> The National Development Framework: Future Wales identifies Bridgend and the valley areas as being within a National Growth Area, specifically Policy 33 (NDF, page 164). The policy states this area is to be the focus for strategic economic and housing growth within the South East region. Under the Welsh Government central estimates 66,400 additional homes are needed in the region until 2039 and over the initial 5 years (2019/20 to 2023/24) 48% of the additional homes needed should be affordable homes. The level of household growth proposed in the deposit LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over</p>	<p>No proposed changes – monitoring framework subject to refinement through the examination sessions.</p> <p>The LDP is considered to be in general conformity with Future Wales</p>	<p>Comments noted.</p> <p>Comments noted.</p>

the 2018 principal projections. This degree of aspiration aligns with Bridgend being within a national growth area. This is supported by 71.9ha of employment, looking to deliver 7,500 jobs, thereby retaining the younger cohort of employees. Collectively, these approaches support Bridgend as having a key role in the national growth area, aligning with the NDF.

Distribution of growth: The LDP has undertaken a settlement hierarchy analysis, concluding that Bridgend is the primary settlement, identifying secondary settlements, as well as directing regeneration to Porthcawl and Maesteg. The Valleys (including Maesteg) are identified in Policy 1 (NDF). The approach of focusing growth in the relevant tiers of settlements, according to service and facility provision is in direct alignment with Policy 2 (NDF) assisting the regeneration of under-performing settlements. This urban focussed approach, based on strategic place making, whilst also seeking to redress regeneration issues compliments the approach set out in the NDF.

Affordable Homes: A key priority of the Welsh Ministers is the delivery of affordable homes, as set out in Policy 7 (NDF). The LDP should maximise the potential to deliver affordable housing through the selection of sites and how they relate to the housing need on a spatial basis. The LDP is supported by a robust, high-level assessment with Statements of Common Ground on the majority of technical aspects with the industry. This aligns with the approach set out in the NDF, combined with the higher level of housing in the plan, aligning with the national growth area. The Welsh Government suggests that where further evidence has been undertaken on strategic and the remaining allocations, this is placed in the public realm before the examination of the plan.

Heat Networks/Renewable Energy:

Decarbonisation & renewable energy is a key aspect to achieve climate change targets and reduce the reliance on fossil fuels and CO2 emissions. The LDP has undertaken extensive technical work in this area, setting out targets for a multitude of different renewable sources and identifying spatial areas for specific sources. Energy Masterplans for major developments and exploring heat networks directly align with Policy 16 (NDF).

Resilient Ecological Networks: The Environment Act (Section 6) set out a framework for planning authorities to maintain and enhance biodiversity to provide a net benefit for biodiversity through a proactive and resilient approach. Central to delivering net benefit is the production of a robust Green Infrastructure Assessment which informs the scale and location of growth and individual site selection. Policies SP17 and DNP6 of the LDP set the framework to deliver on this premise, as set out in Policy 9 (NDF). The Welsh Government notes the specific reference to biodiversity net gain in policy DNP6 (LDP) which, whilst achieving the broad outcomes should be based on a net benefit approach. Although there is broad alignment with the policy approach in the NDF, this is an area where further refinement would be advantageous. This does not impact on the issue of general conformity and can be corrected through the statutory process.

Comments for Consideration

The comments below are intended to provide assistance to the authority and ensure the plan and supporting evidence better aligns with the requirements in the National Development Framework (NDF). If the authority wishes to discuss these comments in more detail, we advise you contact the Welsh Government's Planning Policy team on PlanningPolicy@gov.wales.

- The aspiration in the NDF is for new developments in well-connected and

Refine references to biodiversity net gain in policy DNP6 to be based on a net benefit approach

Clarify how the plan has sought to increase development densities, where appropriate.

Comments noted and accepted. Policy DNP6 will be refined to reflect a net benefit approach.

SP3 outlines a range of criteria to ensure development demonstrates alignment with the principles of Good Design and a Sustainable Placemaking approach. This includes using "land efficiently by being of a density which maximises the development potential of the land whilst respecting that of the surrounding development". Development management Policy COM6 also seek to ensure development creates mixed, socially inclusive, sustainable communities by providing a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. COM6 specifies that "in all cases, housing developments must make the most efficient use of land in accordance with sustainable, placemaking principles. Good Design must be utilised to maximise the density of development without compromising the quality of the living conditions provided, whilst making adequate provision for privacy and space about dwellings". COM6 also specifically states, "higher residential densities and mixed uses must be achieved along public and mass transport hubs to maximise the opportunities for transit orientated development". The proposed policy framework therefore seeks to ensure all land utilised for development is used as efficiently as possible and brought forward at a density which maximises

<p>serviced urban areas to have higher densities (Policy 2). It should be clear how the plan has sought to increase development densities, where appropriate.</p>		<p>the development potential. The detailed Thematic Policies (PLA1-5) also outline the site-specific requirements for the mixed-use Strategic Development Sites. These policies make it clear that, for each site, a masterplan must be prepared and agreed with the Council prior to development. Sustainable placemaking principles include the provision of "a mix of higher densities at key points in the layout and lower densities on the rural/sensitive edges". The proposed LDP policy framework does therefore illustrate how the plan has sought to increase development densities, although indicative masterplans will be appended to Policies PLA1-5 to further illustrate this principle within the submission version of the Plan.</p>
<ul style="list-style-type: none"> Background Paper 17: NDF Conformity Assessment could usefully be improved to make clear how the policies in the LDP conform to the 11 outcomes and policies in the NDF. 	<p>Enhance Background Paper 17 to make clear how LDP policies conform to the 11 outcomes and policies in the NDF</p>	<p>Comments noted and accepted. Background Paper 17: NDF Conformity Assessment will be enhanced to make clear how the policies in the LDP conform to the 11 outcomes and policies in the NDF.</p>
<ul style="list-style-type: none"> Policy SP3 in the LDP should include the need for high speed digital infrastructure in all new developments. Similarly, the reasoned justification in Policy COM14 should make clear that broadband infrastructure is a requirement as set out in the NDF. 	<p>Amend Policy SP3 and COM14.</p>	<p>Comments noted and accepted. Policy SP3 will be amended to include the need for high speed digital infrastructure in all new developments. The reasoned justification to Policy COM14 will be amended to make clear that broadband infrastructure is a requirement as set out in the NDF.</p>
<ul style="list-style-type: none"> Whilst the intentions of Policy SP17 and DNP6 are broadly in line with national policy the framing of these policies has diverged subtly from national policy (specifically net benefit for biodiversity). PPW11 responds to the Section 6 Duty of the Environment Act by setting out a framework for planning authorities to maintain and enhance biodiversity in the exercise of their functions (providing a net benefit for biodiversity) and calling for a proactive approach towards facilitating the delivery of biodiversity and resilience outcomes. The policy in Wales is firmly one of net benefit based on maintaining and enhancing biodiversity and taking account of ecosystem resilience. It is not based on net gain and its associated metric, which is the proposed approach in England. PPW and Future Wales have been framed deliberately in terms of net benefit so as to avoid inadvertent consequences which may emerge through a net gain approach, including for example, where tick box approaches may encourage 	<p>Refine references to biodiversity net gain in policies SP17 and DNP6 to be based on a net benefit approach</p>	<p>Comments noted and accepted. Policies SP17 and DNP6 will be refined to reflect a net benefit approach.</p>

	<p>the notion that enabling loss for uncertain future gain is the acceptable norm. Whilst the intentions of the LDP are broadly in line with PPW it will be important to ensure that the mechanics of delivery are correctly expressed to ensure a net benefit approach is fully embedded in the plan.</p>		
94	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below.</p> <p>Policy ENT5: Former Ford Site, Bridgend XM ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE Policy ENT1(8) & ENT2(8): Waterton Industrial Estate XM ROUTE: 275Kv Overhead Transmission</p>	<p>No objection: advisory comments.</p>	<p>Comments noted.</p>

Line route: ABERTHAW - CARDIFF EAST
– PYLE Policy COM1(1): Parc Afon Ewenni
XM ROUTE: 275Kv Overhead
Transmission Line route: ABERTHAW -
CARDIFF EAST – PYLE Policy PLA2: Land
South of Bridgend (Island Farm), Bridgend
Sustainable Growth Area XM ROUTE:
275Kv Overhead Transmission Line route:
ABERTHAW - CARDIFF EAST – PYLE
Policy COM1(2): Craig y Parcau XM
ROUTE: 275Kv Overhead Transmission
Line route: ABERTHAW - CARDIFF EAST
– PYLE

A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to National Grid assets. Further Advice National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets. We would be grateful if you could check that our details as shown below are included on your consultation database.

LATE SUBMISSIONS – REPRESENTATIONS AREN'T DULY MADE

Title: Do you have any comments to make on the Deposit Replacement LDP?

ID	Comment	Summary of changes being sought/proposed	Council response
34	<p>We support the intent of the plan's policies and proposals to enable the delivery of sustainable development and ensure social, economic, environmental and cultural well-being goals are all suitably balanced in the decision-making process, so the right development occurs in the right place.</p> <p>We acknowledge that you have taken on board advice from our previous correspondence which has enabled positive provisions in the Deposit Plan both in policy terms and with regard to allocation of sites.</p> <p>Our detailed comments on the plan and supporting documents can be found in the annexes to this letter.</p> <p>Please note that our comments are without prejudice to any comments we may wish to make when consulted on any subsequent formal planning application submissions to develop any of the land identified within the plan. At the time of any other consultation there may be new information available which we will need to consider in providing our formal advice.</p> <p>Finally, we look forward to continuing to work closely with you to progress the plan and trust these comments are of assistance. If you have any queries, or if you require any further information, please do not hesitate to contact us at the above address.</p> <p>Annex 1</p> <p>1. Deposit Consultation Document The Deposit Consultation Document provides a strategic direction for the development and use of land until 2033 and sets out detailed specific policies as well as the settlement maps, development limits and site-specific allocations.</p>	Support for the plan's policies and proposals	Comments noted.

<p><u>DNP9: Natural Resource Protection and Public Health</u></p>		
<p>The policy states that ‘<i>All development in flood risk areas must be supported by a Flood Consequences/Risk Assessment and incorporate any mitigation measures required to avoid or manage increased flood risk.</i>’ Please note, new development will be expected to avoid unnecessary flood risk and to meet the requirements of Technical Advice Note (TAN) 15. No highly vulnerable development (as defined in TAN 15) will be permitted within Zone C2 and development will only be considered in areas at risk of flooding where it can be demonstrated that the site can comply with the justification and assessment requirements set out in TAN 15.</p>	<p>New development will be expected to avoid unnecessary flood risk and to meet the requirements of Technical Advice Note (TAN) 15</p>	<p>Comments noted.</p>
<p>In Section 5.5.82 you state that ‘<i>Where development proposals relate to a main river or ordinary watercourse, opportunities should be taken to incorporate in the development a riparian buffer of up to 7 metres adjoining both banks. This will allow for necessary maintenance by NRW and will protect and encourage local diversity.</i>’ We support the provision for a development free buffer however, we advise that reference to NRW and maintenance is removed from this statement. The statement could read ‘<i>This will help protect and encourage local biodiversity and give opportunity to improve connectivity.</i>’</p>	<p>Remove reference to NRW and maintenance in section 5.5.82</p>	<p>Comments noted.</p>
<p>2. Habitats Regulations Assessment (HRA)</p>		
<p>We have reviewed the updated HRA submitted as part of this current consultation and provide the following advice.</p>		
<p>We welcome the detail provided in Table 3.2.7 ‘Consultation’ and confirmation of how our previous advice, specifically in relation to the Bridgend LDP HRA has been</p>	<p>Welcome the detail in Table 3.2.7 in relation to the Bridgend LDP HRA</p>	<p>Comments noted.</p>

<p>considered when drafting the current document.</p> <p>Several references are made in the document to 'likely significant effects' in the context of the Appropriate Assessment (AA). This is considered misleading given that 'likely significant effects' are to be dealt with in part 1 of the HRA 'The Test of Likely Significant Effects'. The AA (HRA Stage 2) is to determine whether a proposal will have an adverse effect on site integrity. As an example, in section 5.3.12 ('Effects on the Integrity of European Sites') it states '...no likely Significant Effects are anticipated from the LDP Deposit Plan through air pollution.'. This should read 'no adverse effects on site integrity.', given that this section is in reference to the Authority having undertaken an AA.</p> <p>In section 6.3.9 (Habitat loss or species disruption), we welcome the removal of site 307.C1 from the LDP Deposit Plan given the overlap of this site and Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands Special Area of Conservation (SAC).</p> <p>We are supportive of the agreed approach in Section 6.4.1 (Mitigation), further detailed in SP17, to undertake a HRA for any relevant proposals within 2km of Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands SAC with the potential to affect marsh fritillary butterfly habitat. However, in addition, due to the SAC's sensitivity to ammonia, consideration should be given to the nature of development in determining the screening distance for a HRA.</p> <p>In section 7.3.8 (Mitigation) we welcome the removal of sites 312.C1 and 352.C55 from the LDP Deposit Plan given the overlap of these sites with Kenfig SAC. However, in section 7.3.9, we have concerns for the increased potential for impacts on Kenfig SAC with the inclusion of site 345.C1. We recommend a 5m buffer from any protected site if there's habitat loss associated with the proposals. Given the lack of detailed</p>	<p>Several references have been made in the document to 'likely significant effects' in the context of the Appropriate Assessment which are considered misleading</p> <p>Welcome the removal of site 307.C1 from the LDP Deposit Plan</p> <p>Supportive of agreed approach in Section 6.4.1. Consideration should be given to the nature of development in determining the screening distance for a HRA.</p> <p>Welcome removal of sites 312.C1 and 352.C55 from the LDP Deposit Plan. Concerns regarding the inclusion of site 345.C1</p>	<p>Comments noted. It is acknowledged that the HRA AA Report should have referenced the test of avoiding "likely adverse effects" on European Sites, rather than "likely significant effects", when summarising the presence or absence of likely impacts on the three European Sites considered within the HRA AA. However, the reporting confirms that HRA Stages 1 and 2 have been appropriately applied, that mitigation (including policy changes) was only taken account of in HRA Stage 2 – AA in connection with the Deposit Plan, and that the HRA processes has demonstrated the absence of likely adverse effects from implementation of the Deposit Plan on relevant European Sites.</p> <p>Comments noted.</p> <p>Comments noted.</p> <p>Comments noted. Candidate site 345.C1 has not been allocated within the Replacement LDP. The site did not progress through to Stage 2 of the Candidate Site Assessment due to the site being located outside the settlement of Porthcawl which is identified as a Regeneration Growth Area (as defined by SP1).</p>
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<p>information available at present on the proposals and the necessarily overarching and broad nature of LDP policies we are unable to comment further but are reassured at the confirmation in this section that a project specific HRA will be undertaken.</p> <p>3. Non-Technical Summary (NTS) – Sustainability Appraisal (SA)</p> <p>Whilst we acknowledge that some of our comments raised in our previous response have been take on board, we advise the following points to be re-considered:</p> <p><u>SA of Strategic Policies</u></p> <p>Section 5.3.1 indicates that no major negative (significant adverse) effects are predicted on the SA objectives and two minor effects relating to biodiversity. Table NTS5.2 summarises the SA of Strategic Policies.</p> <p>For objective 14 Landscape, all policies are considered positive except for SP4 (Sustainable Transport) and SP12 (Retail), where no clear relationship is recognised.</p> <p>It is highly unlikely that there would be no adverse effects at all on landscape character and visual amenity as a result of a Mid-Growth Option and that all effects would be positive. This is not reflected by the Candidate Sites Report. We suggest that Strategic Policies 1, 3, 6, 9, 10, 11, 13, 15 and 16 have potential to cause some adverse landscape and visual effects.</p> <p>Policy SP17 does state that development will not be permitted where it would have an adverse impact on landscape character. This is contradicted in other policies that state development will be permitted where there is no significant adverse landscape impact. SP17 therefore appears to include strong landscape protection than other</p>	<p>Strategic Policies 1, 3, 6, 9, 10, 11, 13, 15 and 16 have potential to cause some adverse landscape and visual effects</p> <p>Policy SP17 includes strong landscape protection than other policies in the LDP</p>	<p>Comments noted. The SA of Growth Options (and all other substantive components) is considered to be appropriate and the associated SA conclusions remain valid, especially as the proposed spatial strategy now detailed within the Deposit Plan aligns with the preferred spatial and growth options identified at Pre-Deposit stage and is supported by a detailed evidence base. All candidate sites particularly during Stage 2 of the Candidate Site Assessment have been assessed for their potential impact upon landscape and visual effects.</p> <p>The Deposit Plan, which must be read as a whole, provides an overarching policy framework rather than itself delivering individual developments. This means that policies which provide support ‘in principle’ for growth levels or development types, but which do not identify specific sites or set out criteria to assess all environmental impacts (e.g. landscape), would not themselves necessarily result in adverse environmental effects. Rather, all substantive components of the Deposit Plan must be considered in tandem, taking account of environmental safeguards which are included within specific policies and therefore do not need to be repeated elsewhere. To secure the application of ‘policy level mitigation’ for potential adverse effects from development proposals on allocated sites at planning application stage, a policy mitigation schedule has been developed through the SA (Appendix G) and is appended to the Deposit Plan.</p>
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<p>policies in the LDP, but the plan needs to be considered as a whole.</p> <p>4. Sustainability Appraisal (SA) We welcome that the comments from NRW submitted during the previous consultation phase are responded to in Table 4.1, including those specifically relating to biodiversity and green infrastructure, and are also reflected in the updated Table 3.1.</p> <p>Please note, that we would welcome consultation at the earliest possible stage on all planning and proposed schemes which may adversely affect the water environment, particularly any residential developments that the SA refers to. We can also provide advice and guidance regarding pollution prevention and protection of local waterbodies from such developments.</p> <p>Annex 2</p> <p>1. Strategic Flood Consequences Assessment (SFCA) Planning Policy Wales (Section 6.6) describes the need to move away from flood defences and mitigation of flooding consequences. It states planning authorities should adopt a precautionary approach of positive avoidance of development in areas of flooding. It also states that development should reduce, and must not increase, flood risk on and off the development site itself.</p> <p>This advice is supported by Technical Advice Note (TAN) 15 which provides a precautionary framework to guide decision making. This framework includes the planning tests contained within Section 6 of TAN15.</p> <p>Section 10 of TAN15 provides advice in respect of development plans. Paragraph 10.8 is clear that sites in Zone C2 should not be allocated for highly vulnerable development. We refer you to Welsh Government's Chief Planning Officer letter -</p>	<p>Welcome that the comments from NRW submitted during the previous consultation phase have been responded to in Table 4.1</p> <p>Guidance on SFCA</p>	<p>Comments noted.</p> <p>Comments noted.</p>
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<p>Planning Policy on Flood Risk and Insurance Industry Changes (9th January 2014) which affirms this policy direction.</p> <p>Allocations for less vulnerable development in C2 and allocations in C1 should only be made if it can be justified that the development or use is in accordance with the tests in Section 6, including whether the consequences of flooding are acceptable in accordance with Appendix 1 of TAN15. It is for the planning authority to fully explain and justify the reasons for allocating a site within Zone C. A proposed allocation should not be made if the consequences of a flooding event cannot be effectively managed.</p> <p>Section 10 of TAN15 identifies that where the local planning authority wishes to allocate a site, and can justify such an allocation, the local planning authority will need to undertake an assessment of the consequences of flooding. This assessment should demonstrate that the consequences of flooding have been understood and are capable of being managed in an acceptable way. Where such local information has been produced then this should be reflected in the plan. If the consequences are considered acceptable in accordance with section 7 and appendix 1 of TAN15, the resulting allocation should include annotation of flooding as a constraint for the individual site on the proposals map and specify the policy requirements which pertain to the development of that site. This should include making it clear that in taking forward the allocation a developer will need to undertake detailed technical assessment in accordance with appendix 1, to ensure that the nature of the proposed development is acceptable, that it is suitably designed to cope with the risk of flooding, and that any funding and maintenance provision is appropriate.</p> <p>As you are aware, TAN15 is due to be revised by WG. There may be a requirement to review certain allocations subject to the content of the new TAN.</p>		
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<p>The submitted SFCA covers the salient points required to provide an initial broad scale assessment of flood risk in the Borough. We note Section 5.3.3 states '<i>Any available NRW detailed 1D-2D models available in these areas were used to inform the SFCA but no additional flood modelling was undertaken as part of the SFCA update.</i>' We assume from this statement that there is no modelling to review at present, but it is accepted that updated modelling will be required, and this will need to be reviewed when submitted to NRW.</p> <p>We also advise the following points within the SFCA should be amended:</p> <p>In Section 7.4 'Pencoed' it states '<i>Development in areas of very shallow fluvial flooding in the 0.1% AEP event may need to acknowledge the inherent uncertainty in flood modelling urban environments where flooding is less than the typical curb height or property threshold (i.e. <150mm). Consequently, a more pragmatic view as to the realisation of third-party impacts may be justified.</i>' TAN 15 is clear that there should be "no increase flood risk elsewhere" with agreed modelling tolerances set to 5mm, therefore this statement should be removed. When assessing third-party detriment as part of a FCA review, development can only comply with TAN 15 if there is no detriment.</p> <p>In Section 7.5 'Pyle, Kenfig and North Cornelly' it states '<i>Village Farm Industrial Estate: It may be appropriate to apply greater latitude to the inductive guidance of A1.14 and A1.15 as applied to this site, provided the development does not increase the vulnerability of development and will contribute to an overall improvement in flood resilience within the Estate.</i>' Table A1.14 of TAN15 is not inductive and sets a clear threshold that developments must achieve.</p>	<p>SFCA should be amended to remove "no increase flood risk elsewhere" from Section 7.4</p> <p>SCFA should be amended setting out that Table A1.14 of TAN15 sets a clear threshold that developments must achieve.</p>	<p>Comments noted. Please see Bridgend Strategic Flood Consequences Assessment Update (2022), of which has removed reference to third-party detriment.</p> <p>Comments noted. Please see Bridgend Strategic Flood Consequences Assessment Update (2022), of which has removed wording relating to "inductive guidance".</p>
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<p>2. Proposal Maps (Site Allocations) Our detailed comments on site allocations were provided within our Draft Pre-Deposit Preferred Strategy consultation response, dated 06 November 2019 (our reference: CAS-101670-W2N8) and our Candidate Site Register response dated 3 December 2019 (our reference: CAS-103962-P856) and we continue to refer your Authority to these observations.</p> <p>Within the above responses a number of sustainable and regeneration growth areas were highlighted due to their siting within Zone C of the development advice maps referred to under TAN 15 and in particular highly vulnerable developments within zone C2. We acknowledge that these sites have been considered within the supporting SFCA and through this assessment have been categorised as either amber or green. We agree with the stance taken within the assessment that no highly vulnerable development will be located within zone C2.</p> <p>Ideally, sites should be located entirely outside of zone C. As noted in TAN 15 “The development at these locations will only be justified if it can be demonstrated that: -</p> <p>i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement1; or,</p> <p>ii Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region;</p> <p>and,</p> <p>iii It concurs with the aims of PPW and meets the definition of previously developed land (PPW fig 2.1); and,</p> <p>iv The potential consequences of a flooding event for the particular type of development</p>	<p>Comments on site allocations were provided within NRW’s Draft Pre-Deposit Preferred Strategy consultation response.</p> <p>Agree with the stance taken within the assessment that no highly vulnerable development will be located within zone C2.</p>	<p>Comments noted.</p> <p>Comments noted.</p>
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<p>have been considered, and in terms of the criteria contained in sections 5 and 7 and appendix 1 found to be acceptable.”</p> <p>Please note the justification tests do not apply to highly vulnerable development within zone C2.</p> <p>Any sites within or bordering zone C will, in line with the final test (iv) above require a site-specific flood consequence assessment (FCA) to demonstrate that the consequences of flooding can be managed to an acceptable level. The nature and level of development and site design should be governed by the conclusions of the FCA.</p> <p>Our comments on flooding need to be considered in line with the Lead Local Flood Authority’s comments as well as your SFCA findings. The LLFA will offer advice regarding risk from ordinary watercourses and surface water flooding which should be given the same consideration as our advice.</p> <p>In addition, we note your email from 22 July 2021 and the questions/comments therein. We have tried to provide clarity on the points raised below.</p> <p>Pencoed – Our latest updated model is from 2020 which updated FRAW. We will run the 1000cc and if the model is stable the output will be ready for update later this year. We have not reviewed the SFCA model produced in 2018 mentioned in your email but would suggest our model would supersede this.</p> <p>Porthcawl – In February 2019 NRW was in correspondence with Robin Campbell of Arup regarding their proposed methodology for modelling wave overtopping at Sandy Bay, Porthcawl. This was for an initial study and we haven’t had any further input regarding the detailed design of the Coastal Scheme. We are therefore unable to comment on the accuracy of any Defended Area. This would require a Flood Map Challenge from Bridgend County Council.</p>	<p>Clarity regarding Flood Map Challenges for allocations</p>	<p>Comments noted.</p>
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Waterton – This would require a Flood Map Challenge from Bridgend County Council.

For an area to be designated as a TAN15 Defended Zone, there is strict criteria that it has to meet. This will be detailed in guidance when the new map is released, but in summary of the main points:

- TAN 15 defended zones have only been created for River and Sea flooding only, not surface water and small watercourses
- For Flood Defences built prior to 2016, TAN 15 defended Zones are created where present day, defended level of projection is identified;
 - o 1 in 100 years for Rivers or
 - o 1 in 200 year for Sea.
- The level of protection identified in Defended Area Cutters does not include a specific allowance for freeboard where data has been taken from detailed model information, e.g. the defended level is taken as the crest of an embankment assuming there is no breach.
- For flood defences built from 2016 onwards there needs to be allowance for a design freeboard and climate change (assuming 100year lifetime of development).
- There may be a residual risk within a TAN 15 Defended Zone from different sources. The updated TAN 15 is to set out how this risk should be addressed as part of an FCA.
- Only created for NRW and other Risk Management Authorities, presumption against incorporating Private Defences in most cases. Any request to incorporating Private Defences must be in agreement with Welsh Government and meet strict criteria,
 - o Large scale development of local or national significance.
 - o Formally designated as a flood defence and recorded within the National Asset database

	<p>o Evidence to demonstrate maintenance and funding for the flood defence over the lifetime of the development.</p> <ul style="list-style-type: none">• In the long term it is anticipated that the TAN15 Defended Zones will be reviewed and updated every 2-3years as part of a formal consultation process (as directed by Welsh Government).		
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