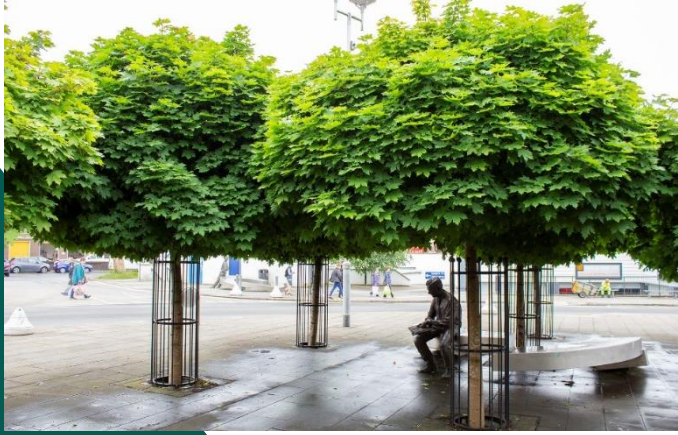
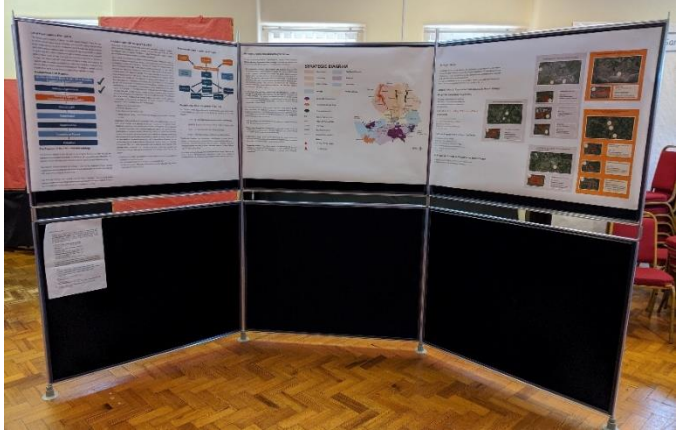




Bridgend Replacement Local Development Plan 2018-2033



Deposit Consultation Report 2022

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- Volume 12 – Member of the Public – Ogmore and Garw Valley
- Volume 13 – Member of the Public – Bridgend and Pencoed
- Volume 14 – Member of the Public – Deposit Replacement Local Dev Plan
- Volume 15 – Borough / Town / Community Councillors
- Volume 16 – Developers and Landowners
- Volume 17 – Statutory Consultees plus Others

1. Background and Introduction

- 1.1 An up-to-date Local Development Plan (LDP) is an essential part of a plan-led planning system. The Planning and Compulsory Purchase Act 2004 (section 62) places a duty on all local planning authorities (LPAs) in Wales to prepare a LDP for their area. The Town and Country Planning (LDP) (Wales) Regulations 2005 (as amended) “LDP Regulations”, prescribes the form and content of the LDP and makes provision for the procedure to be followed in their preparation.
- 1.2 The existing Bridgend LDP (adopted on 18th September 2013) sets out the priorities and objectives of the Corporate Plan that relate to the development and use of land. Since adoption, the existing LDP has been monitored on an annual basis to determine whether the Council’s land use and regeneration objectives are being successfully implemented. The results of these findings have published in Annual Monitoring Reports (AMRs) to fulfil the Council’s statutory obligations under Section 76 of the Planning and Compulsory Purchase Act 2004.
- 1.3 The Council is also statutorily required, under Section 69 of the Planning and Compulsory Purchase Act 2004, to undertake a full review of the adopted LDP at intervals not longer than every 4 years from the date of adoption. As such, a full review of the adopted LDP was triggered in September 2017. The Review Report recognised an urgent need to address the shortfall in the housing land supply by identifying additional housing sites, whilst recognising other significant contextual changes in circumstances and policy at a national, regional and local level. A Delivery Agreement (DA) for the Replacement Bridgend LDP was therefore prepared and approved by Welsh Government on 25th June 2018. The DA comprises a timetable for preparing the Replacement LDP and a Community Involvement Scheme (CIS) which sets out how and when stakeholders and the community can contribute to the plan preparation process.
- 1.4 Work on the Replacement LDP progressed at pace from June 2018, including: the County Borough’s key Issues, Vision and Objectives; the Growth Options; the Spatial Options; a call for candidate sites; and the continued development of a robust evidence base. Most notably, the Preferred Strategy statutory consultation period took place between 30th September 2019 and 8th November 2019, in accordance with LDP Regulation 15 and the DA. The Initial Consultation Report was published and reported to Council and on 22nd January 2020 in accordance with LDP Regulation 16A. That Report identified the steps taken to publicise plan preparation in conformity with the CIS; the bodies involved, notified or consulted at the pre-deposit stage; a general summary of comments together with the LPA’s response; and the main issues raised and how they influenced the Deposit LDP.

- 1.5 However, progress towards the Deposit Plan Consultation Stage (originally scheduled for July/August 2020) was delayed. This was due to the national restrictions imposed across Wales in response to the Coronavirus pandemic, and, specifically, the inability of people and businesses to function as they once did before the crisis. For these reasons, Welsh Government confirmed agreement to a Replacement DA on 5th October 2020, which included a timetable extension, an 8-week deposit consultation period, plus an additional single three-month slippage period to ensure a small amount of flexibility. Equally, the revised CIS recognised the need to make greater use of: virtual meetings; social media; digital communication; web-based consultation tools; one to one telephone appointments; dissemination of hard copies to individuals; appointment based drop-in sessions; and internal and external agencies to assist with community meetings and engagement. This was imperative to ensure effective consultation could progress during a period of lasting restrictions.
- 1.6 In accordance with the Replacement DA and LDP Regulation 17, the Deposit Replacement LDP was then published and subject to public consultation from 1st June 2021 to 27th July 2021. This Consultation Report has therefore been prepared to update and expand upon the Initial Consultation Report, thereby fulfilling the Council's legislative requirements as set out in LDP Regulation 22(2). This Consultation Report:
- a) Outlines the audit trail and summary of the key issues raised by representors at the Deposit Stage;
 - b) Lists who has been engaged at the Deposit Stage;
 - c) Includes a summary of the main issues and representations made;
 - d) Recommends how the Council considers how each representation should be addressed, and;
 - e) Sets out an explanation and implication of any deviation from the CIS.
- 1.7 This Consultation Report documents that the Council was in receipt of 1,221 representations during this key consultation period. Processing this volume of correspondence was a significant logistical and administrative exercise, meaning additional time was necessary to adequately assess and respond to the observations received. Furthermore, new information, changes to legislation, updated national planning guidance and the completion of supporting technical information necessitated a review of the LDP evidence base. Progress towards submission of the Replacement LDP Deposit Document to Welsh Government and the Planning Inspectorate (originally scheduled for September 2021) was therefore delayed. A further Replacement DA was approved by Council on 17th November 2021 and Welsh Government also confirmed agreement on 10th December 2021. This included a timetable extension, with submission of the Plan re-scheduled to June 2022.

- 1.8 This Consultation Report comprehensively documents how the Council has considered all representations made on the Deposit Plan. It represents a key pre-requisite to submission of the Replacement LDP in accordance with the latest Replacement DA.
- 1.9 While the Replacement LDP is being prepared, the existing LDP (adopted September 2013) remains extant and will continue to provide the policy framework by which planning applications will be determined. This will remain the case until the point at which the Replacement LDP 2018-2033 is formally adopted by the Council. Once adopted, the Replacement LDP will express, in land-use terms, the wellbeing objectives and priorities of the Bridgend Public Services Board's Well-being Plan.

How to Use This Document

- 1.10 This Report begins by providing an overview of the consultation methods at key consultation stages throughout the Replacement LDP. These include:
- Delivery Agreement (LDP Regulation 9) – page 5
 - Call for Candidate Sites – page 6
 - Pre-Deposit Participation (LDP Regulation 14) – page 8
 - Preferred Strategy Consultation (LDP Regulation 15) – page 9
 - Deposit Consultation (LDP Regulation 17) – page 12
- 1.11 A detailed summary of the main findings of the public consultation exercise on the Replacement Deposit LDP is provided from page 17. This summary is not intended to be a comprehensive report on each comment received, rather an overview of the key issues raised in response to the specific questions on the consultation form. This section is structured around each consultation question, sets out the main corresponding points received under thematic headings, together with the Council's subsequent responses.
- 1.12 A more succinct summary of the public consultation exercise on the Replacement Deposit LDP is provided in Table 1, page 57. This is provided in table form for ease of reference.
- 1.13 Detailed responses to all representations received during the public consultation exercise on the Replacement Deposit LDP are also provided in Appendix 4, grouped by consultation question. Each comment on the Deposit Plan is accompanied by a representor number, which you may have previously received during correspondence with the Council regarding the Replacement LDP. If you do not know the representor number, please contact the Strategic Planning Policy Team directly, who will assist you.

1.14 A separate Representations Register has also been published, which provides a copy of the duly made representations that were received by the Council during the Replacement Local Development Plan (LDP) Deposit public consultation. This Register has been published in accordance with Regulation 19 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 and can be viewed [here](#). This Register is a factual compilation of the comments received during the consultation period. Please note that every effort has been made to redact personal information such as addresses, signatures and other private contact details. Individual names of members of the public have also been redacted.

2 Delivery Agreement (LDP Regulation 9) Consultation

- 2.1 A report was presented to Council on the 25th April 2018 seeking authorisation to undertake targeted consultation on the draft DA between 30th April 2018 and 25th May 2018. The consultation was advertised in the following ways:
- The consultation documents were available for inspection with representation forms at the Civic Offices, Angel Street;
 - Information on the consultation, including all the documentation, representation forms and the facility to make representations electronically was placed on the Council's website; and
 - E-mails and letters were sent to approximately 190 consultees including Community Councils, planning consultants, house builders, housing associations and other relevant external organisations with details on how to respond.
- 2.2 In total, eight external organisations submitted comments on the draft DA during the consultation period. A Consultation Report was appended to the DA, which provides the Council's response to the representations received. Resultant changes to the DA were made including updates to consultees, an amendment to the timetable and enhanced linkages with the Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment (SEA)). These changes are detailed in Appendix 3 of the DA.
- 2.3 The final DA consists of two parts: a timetable for preparation of the Replacement LDP and a CIS. The timetable sets out the key dates including statutory consultation periods, for each of the different stages of Plan preparation and publication. It also includes key stages for the SA, which is an iterative process undertaken as an integral part of the Plan preparation process. The CIS outlines the LPAs principles of community engagement, its approach in relation to who, how and when it intends to engage with the community and stakeholders; how it will respond to representations and how these representations will inform later stages of plan preparation.
- 2.4 Welsh Government confirmed agreement to the DA on 25th June 2018 as provided for by Section 63(4) of the Planning and Compulsory Purchase Act 2004 and LDP Regulation 9. The published version of the DA was then made publicly available in accordance with the requirements indicated in Regulation 10.

3 Call for Candidate Sites

3.1 The call for Candidate Sites commenced on 14th September 2018 and closed on 9th November 2018. During this period, the Council invited the public, developers and landowners to nominate Candidate Sites to be considered by the LPA in preparing draft land use proposals for the LDP. The process was advertised as follows:

- In writing/email to over 300 persons and organisations on the LDP consultation database (including Specific Consultation Bodies, all Elected Members and Town and Community Councils);
- An advert placed in the Glamorgan Gazette on 20th September 2018;
- An advert placed in the Glamorgan Gem on 27th September 2018;
- A press release issued on the Council's Facebook and Twitter pages;
- Candidate Site forms were made available in all libraries and the Civic Offices reception area, and;
- All information was placed on the Council's web site, including a link from the 'home page' and a downloadable form.

3.2 This process not only enabled developers to submit sites for consideration, but it also provided members of the public and organisations the opportunity to propose areas of land for retention and / or protection from development. In total, 171 sites were submitted and collated into a 'Candidate Site Register'. The Register contains baseline information extracted from the candidate site forms submitted. This includes: the site's unique reference number; a location description; the proposed use(s) of the land; the name of the person(s)/organisation proposing the site; the settlement the site is in or its nearest settlement; the ward the site is in; and the approximate area of the site.

3.3 It was stressed that the publication of any site in this Register did not denote any status, imply any preference of the LPA regarding its merits or suggest that it will be taken forward for inclusion within the Replacement LDP. The Candidate Sites Register was therefore not published as a public consultation document, rather a factual compilation of the sites which had been submitted. The Register was published by the Council and reported to Development Control Committee on 14th February 2019. The LPA:

- Made the Candidate Site Register available to view on the LDP pages of the Council's website;
- Notified all Council Members that the Candidate Site Register is available to view online and made a hard copy available in the Members Lounge;
- Notified all Town and Community Councils within Bridgend County Borough that the Candidate Site Register is available to view online;

- Notified all of the Specific Consultation Bodies, members of the LDP Consultee Database and any other consultees listed in Appendix 1 of the LDP DA that the Candidate Site Register is available to view online;
- Made a hard copy of the Candidate Site Register available at the Council's Civic Offices (main reception) and all public libraries throughout the County Borough; and
- Made available the hard copy Candidate Site Register for purchase at cost of £15.

3.4 Awareness of such sites enabled the Council to develop an enhanced appreciation of site availability when formulating the Vision and Strategic Options for the Replacement LDP. The supporting information provided was also used to assess the sites submitted against the LDP Strategy to determine their suitability for possible inclusion in pre-deposit proposals and/or the deposit LDP. This formed the basis for the detailed Candidate Site Assessment and SA of those sites as appropriate.

4 Pre-Deposit Participation (LDP Regulation 14)

- 4.1 LDP Regulation 14 states that, before complying with Regulation 15 (relating to Pre-Deposit Proposals), an LPA must, as it considers appropriate, engage specific and general consultation bodies for the purpose of generating alternative strategies and options.
- 4.2 The Council therefore prepared a draft Vision, three Strategic Growth Options and four Spatial Strategy Options to inform preparation of the Pre-Deposit Proposals. There is no statutory requirement for the Council to carry out public consultation at this stage. However, focussed engagement was undertaken with certain specific consultation bodies, as considered appropriate, to consider a range of strategies and options, whilst gaining further insight into their different implications. These bodies included:
- Welsh Government (14th January 2018 and 4th March 2019)
 - Cwm Taf Health Board (13th March 2019)
 - Local Education Authority (14th March 2019)
 - Local Highway Authority (23rd January 2019 and 17th July 2019)
 - Council Briefing (20th March 2019)
 - Bridgend Assets Sub-Board, incorporating multi-agency collaboration on the HIA of the LDP (12th July 2019)
- 4.3 The purpose of this period of engagement was to receive feedback on the general thrust and direction of the Plan at this early stage of preparation, whilst recognising the implications for different strategic growth and spatial options. Several themes emerged from this engagement, notably the recognition of primary healthcare as a key issue, the need to maximise sustainable travel opportunities, high emphasis on recreation space and the importance of ensuring housing growth is accompanied by job opportunities. The engagement helped to direct the emerging Preferred Strategy, in conjunction with the existing and developing evidence base.
- 4.4 Three technical reports were prepared and reported to Development Control Committee on 14th February 2019, which provided background information in respect of the draft vision and objectives, growth options and spatial strategy options proposed for the Replacement LDP. The reports were prepared to inform the ongoing pre-deposit engagement and participation, the preparation of the preferred strategy and subsequent stages of plan preparation. These technical reports were approved as the basis for preparing the Preferred Strategy document for formal public consultation in October / November 2019.

5 Preferred Strategy Consultation (LDP Regulation 15)

5.1 LDP Regulation 15 requires the Council to publish its pre-deposit proposals (Preferred Strategy) for public inspection and consultation before determining the content of its LDP for Deposit. Therefore, the Preferred Strategy was published in September 2019, representing the completion of a period of pre-deposit plan preparation and engagement, which influenced its development. The Preferred Strategy set out the Council's Vision, Strategic Objectives and Spatial Strategy to guide the level of future development and growth in Bridgend County Borough, including a set of strategic policies that dealt with the main priorities for the Plan. This provided the strategic context for the preparation of more detailed policies, proposals and land use allocations for subsequent inclusion in the Deposit LDP.

5.2 The statutory consultation period on the Preferred Strategy was held from 30th September 2019 to 8th November 2019. The documents available for public consultation were:

- Bridgend County Borough LDP 2018-2033 Preferred Strategy Consultation Document
- Background Paper 1: Vision and Objectives
- Background Paper 2: Strategic Growth Options
- Background Paper 3: Spatial Strategy Options for the Distribution of Growth
- Background Paper 4: Housing
- Background Paper 5: Local Housing Market Assessment (LHMA)
- Background Paper 6: Employment
- Background Paper 7: Retail
- Background Paper 8: M4 Junction 36
- Background Paper 9: Compatibility Assessment of the LDP Vision, Objectives & Strategic Policies Against the Wellbeing of Future Generations Act
- Existing LDP Review Report
- Replacement LDP DA
- SA / SEA Scoping Report
- SA, incorporating the SEA.
- SA and SEA - Initial SA Report
- The Full SA of the Preferred Strategy
- The Full SA of the Preferred Strategy Non-Technical Summary
- Habitats Regulations Assessment
- Candidate Site Register
- Settlement Assessment Study (2019)
- Demographic Analysis and Forecasts Report (2019)
- LHMA (2019/20)
- Draft Economic Evidence Base Study (2019)
- Draft Retail Study (2019)
- Equalities Impact Assessments

- Bridgend Smart Energy Plan (2019)
- Outdoor Sport and Space Audits (2017)
- Special Landscape Designations (2010)
- Landscape Character Assessment for Bridgend County Borough (2013)
- Gypsy and Traveller Accommodation Assessment (2016)
- Bridgend's Active Travel Integrated Network Map
- Bridgend Destination Management Plan 2018-2022
- Bridgend Strategic Flood Consequences Assessment (2010)

5.3 One of the key aims of the Replacement LDP is to ensure plan production is based on effective community involvement. This is to ensure a range of views can be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. Several consultation methods were therefore utilised at Preferred Strategy stage to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included:

- A Notice of Pre-deposit Public Consultation was placed within the Glamorgan GEM on Thursday 26th September 2019 (the week before the start of the consultation period). The Notice stated where the Preferred Strategy, initial SA Report (including the Environmental Report) and the background documents could be viewed along with details of how and when representations could be made. A follow-up notice was also placed in the Glamorgan GEM during the first week of consultation (3rd October 2019) for completeness.
- The package of consultation documents was made available online via Bridgend County Borough Council's Website (www.bridgend.gov.uk). A facility was made available for respondents to complete an electronic response template and submit this form by email to make representations. Respondents were also provided with the option to print the response form for completion by hand and submission by post if preferred.
- Printed reference copies were placed within public facing Council buildings, including every library in the County Borough (fixed and mobile) as well as the Customer Service Centre at the Council's Civic Offices in Angel Street, Bridgend. These documents were available to view during the usual opening hours. Printed copies of the response forms were also made available for members of the public to complete and submit by post in addition to online signposting.
- Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Preferred Strategy Consultation. In total, 354 representors were contacted, provided with details of how to access the package of consultation documents and told how to respond. As the

consultation progressed, additional representors were informed of and added to the database upon request.

- Several public 'drop in' exhibitions were arranged and advertised across the County Borough (13 separate dates). A minimum of two Development Planning Officers were present at each of the thirteen exhibitions to explain the process directly to members of the public and to clarify any queries.
- Planning Aid Wales were commissioned by the Council to run engagement events for all Town and Community Councils in Bridgend County Borough; both before and during the consultation. These events were designed to provide more information on the LDP process, the implications of the Preferred Strategy and details of how to respond and shape the process.
- An exhibition was held at the Bridgend County Borough Youth Council Open Day on 28th October 2019, which was arranged during half term to maximise attendance.
- The consultation was promoted periodically on social media and several posts were made on the Council's official social media pages during the consultation window.

5.4 The consultation was framed around twelve questions, designed to assist with individual representations and ensure all key strategic aspects of the Preferred Strategy were duly considered by respondents. Representors were asked to make specific comments on the preferred options, related policies and recommendations. In total, 70 representations were submitted by a range of organisations/individuals.

5.5 In preparation for the Deposit Stage of the LDP, an Initial Consultation Report was drafted as soon as reasonably practicable after pre-deposit consultation, in accordance with LDP Regulation 16A. That Report provides further detail on how the Council undertook public participation and consultation on the Preferred Strategy. It also identifies the steps taken to publicise plan preparation, in accordance with the CIS, before outlining the specific bodies engaged, summarising the main issues raised and identifying how the responses have been or will be addressed. The Initial Consultation Report is not intended to be a comprehensive report on each comment received (site-specific or otherwise), rather a summary of the key issues raised in response to the specific questions on the consultation form. The Report provides significant detail on how this key period of consultation influenced development of the Deposit LDP.

6 Deposit Consultation (LDP Regulation 17)

6.1 Regulation 17 of the LDP Regulations (2005) requires that, prior to submitting its LDP to Welsh Government, the Council must publish its deposit draft for public inspection and consultation. On 18th May 2021, Cabinet resolved to approve the Replacement LDP Deposit Draft, and supporting evidence base documents, for an 8-week public consultation period in accordance with the Replacement DA. The consultation took place from 1st June 2021 until 27th July 2021.

6.2 The Deposit Plan builds upon the Preferred Strategy and Initial Consultation Report, and, in doing so, the Deposit Plan provides an updated strategic framework to underpin the Replacement LDP. The Deposit Plan contains the strategy, policies and allocations, supported by relevant background evidence. It provides:

- enhanced spatial definition;
- a full suite of site allocations to meet identified needs;
- an enhanced policy framework (including development management policies); and,
- delivery and monitoring mechanisms.

6.3 The documents available for public consultation were:

- Deposit LDP – Written Statement
- Deposit LDP – Proposals Map
- Equalities Impact Assessment of the Draft Deposit LDP
- Existing LDP (2013) Review Report
- Replacement LDP DA
- Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Scoping Report
- SA/SEA Scoping Report Initial Report
- Preferred Strategy & Initial Consultation Report
- Full SA of the Deposit Plan and Non-Technical Summary
- Habitat Regulations Assessment
- The Full SA of the Preferred Strategy and non-technical summary
- Candidate Site Register
- Candidate Sites Assessment Report (2020)
- Economic Evidence Base Study (2019)
- Economic Evidence Base Update (2021)
- Retail Study (2019)
- Renewable Energy Assessment (2019)
- Bridgend Smart Energy Plan (2019)

- Settlement Assessment Study (2019, revised 2021)
- Demographic Analysis and Forecasts Report (2019)
- LDP Demographics Update Addendum (2020)
- Outdoor Sport and Children’s Play Space Audit (2021)
- Green Infrastructure Assessment (2021)
- LHMA (2021)
- Special Landscape Designations (2010)
- Landscape Character Assessment for Bridgend County Borough (2013)
- Health Impact Assessment
- Gypsy and Traveller Accommodation Assessment (2020)
- Bridgend’s Active Travel Integrated Network Map
- Bridgend Destination Management Plan 2018-2022
- Bridgend Strategic Flood Consequences Assessment (2020) (SFCA)
- Plan-Wide Viability Assessment (2021)
- Bridgend Local Biodiversity Plan (2014) (LBAP)
- Green Wedge Review (2021)
- Site of Importance for Nature Conservation (SINC) Review (2020)
- Strategic Transport Assessment (STA, 2021) Interim Note from Mott Macdonald
- Infrastructure Delivery Plan (2021)
- Settlement Boundary Review (2021)
- Urban Capacity Study (2020)
- Test of Soundness (2021)
- Background Paper 1: Vision and Objectives
- Background Paper 2: Preferred Strategy Strategic Growth Options
- Background Paper 3: Spatial Strategy Options
- Background Paper 4: Trajectory
- Background Paper 5: Affordable Housing
- Background Paper 6: Retail
- Background Paper 7: Employment
- Background Paper 8: M4 Junction 36
- Background Paper 9: Compatibility of the Replacement LDP Objectives against the Bridgend Local Well-Being Plan
- Background Paper 10: Compatibility Assessment of LDP Vision, Objectives & Strategic Policies against Well Being of Future Generations
- Background Paper 11: Covid-19 Policy Review
- Background Paper 12: Aggregate Safeguarding Assessment of Site Allocations
- Background Paper 13: Rail Commuter Trips and Infrastructure
- Background Paper 14: Minerals
- Background Paper 15: Best and Most Versatile (BMV) Agricultural Land
- Background Paper 16: Development West of Pencoed Railway Line

- Background Paper 17: NDF Conformity Assessment
- Background Paper 18: Gypsy and Traveller Site Options

6.4 The Deposit Stage of LDP preparation provided an opportunity for all stakeholders to comment on both the policies and sites proposed. The consultation was undertaken in accordance with the first Replacement DA and CIS, which recognised the need to rely more heavily on web-based, virtual and remote consultation methods. Indeed, as the consultation was undertaken during a period where pandemic-related restrictions were evolving and had the potential to change at short notice, it was not deemed appropriate to book public exhibition venues for public drop-in sessions. Such venues need to be booked well in advance and the schedule would have needed to be advertised at the start of the consultation period. Reliance on this method of consultation could have risked jeopardising the effectiveness of the consultation if, for example, restrictions were altered, venues were no longer able to accommodate such sessions and officers would have had to cancel scheduled public exhibitions.

6.5 A longer consultation period (8 weeks, rather than the statutory 6-week period) was therefore utilised to make allowances for this situation. Moreover, and in accordance with the first Replacement CIS, a number of consultation methods were used to ensure efficient and effective consultation and participation:

- A Legal Notice was placed within the Glamorgan Gazette on 3rd June 2021;
- The package of consultation documents was made available online via Bridgend County Borough Council's Website (www.bridgend.gov.uk/ldpconsultation). Respondents were able to complete an electronic survey or request a postal survey;
- Printed reference copies were placed within public facing 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 in Angel Street, Bridgend by appointment;
- Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Deposit Consultation. 406 separate representors were contacted, provided with details of how to access the package of consultation documents and how to respond. As the consultation has progressed, additional representors were added to the database upon

request (a list of all bodies contacted during this stage is provided in Appendix 2);

- Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in Bridgend County Borough (see Appendix 3);
- A comprehensive social media plan was devised. A series of social media posts were scheduled to be released periodically, drawing attention to different thematic areas / parts of the County Borough throughout the consultation period;
- Planning officers presented details of the consultation remotely to Members and 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;
- Posters were sent to all Town and Community Councils to display within their public notice boards; and
- Hard copies of information were disseminated to individuals on request. Members of the public were able request a copy of the survey by post to complete by hand (free of charge). Individual hard copies of the whole Deposit Plan and Proposals Map was made available for a fee of £25 (inclusive of postage and packaging).

6.6 These various means of consultation proved highly effective. The LPA received and responded to over 130 emails and telephone appointment requests combined during this period. This enabled officers to outline proposals, answer queries and provide bespoke planning advice to enable representors to submit more informed responses to the consultation. Whilst this advice was remote rather than face-to-face, this form of consultation was well-used by consultees and enabled detailed one-to-one discussions to take place. Indeed, 1,221 representations were subsequently made on the Deposit Plan.

6.7 All individual representations have been published within a separate Representations Register as a factual record of the representations received on the Replacement Deposit LDP. In addition, the LPA's response to each representation is also appended to this report (Appendix 4 – Detailed Representation Responses) organised by the themes detailed on the consultation form and the type of representor.

- 6.8 One of the representations attached an online petition against the proposed Land West of Bridgend Allocation (SP2(3)). This petition included 944 records and each record included a name, broad location of residence and a post or zip code. In total, only 366 of the records included full post codes or zip codes, 39 names appeared more than once, 90 names matched the names of individuals that had submitted separate representations individually and 368 records originated from individuals residing outside of Bridgend County Borough. As such limited signatory information was provided within the petition, further verification of these individuals has not been possible. However, the concerns raised by the petition are addressed in full in Appendix 4 (refer to representation number 1513).
- 6.9 The following section summarises the key issues raised throughout the process, including the representations made and recommendations as to how the LPA considers each representation should be addressed.

7 Summary of Deposit Consultation Representations (LDP Regulation 17)

7.1 This section provides an overview of the main findings of the public consultation exercise on the Replacement Deposit LDP. It is not intended to be a comprehensive report on each comment received, rather a summary of the key issues raised in response to the specific questions on the consultation form. This section is structured around each consultation question, sets out the main corresponding points received under thematic headings, together with the Council's subsequent responses. A more succinct tabular summary is provided after this section (Table 1). Detailed responses to all representations received are also provided in Appendix 4, grouped by consultation question.

1. Do you have any comments to make on the Key Issues and Drivers, Vision and Objectives of the Deposit Replacement LDP?

7.2 Numerous representors commented that the Key Issues, Drivers, Vision and Objectives appear to be positive, appropriate and accurately reflect local issues that have strategic land-use implications for the County Borough. Certain representors stated the objectives have been robustly prepared to set out the land use planning commitments needed to accommodate growth and development needs over the plan period in line with national policy, guidance and legislation. Other commentators emphasised that the Key Issues, Drivers, Vision and Objectives clearly identify the relevant evidence base used to formulate the emerging plan, whilst acknowledging the progression since development of the Preferred Strategy. Support was also cited for certain settlements being identified as the key or main settlements, in recognition of the fact that they act as hubs for services, employment, housing and retail. It was stressed that the Key Issues, Drivers, Vision and Objectives clearly recognise the pivotal role that these settlements have in spreading prosperity to the surrounding communities.

7.3 However, several members of the public felt there was a mismatch between Strategic Objective 4 'To Protect and Enhance Distinctive and Natural Places' and several proposed housing developments, particularly in relation to specific sites within or at the edge of existing settlements. Concerns were raised that the Replacement LDP places too much emphasis on development and not enough on protecting the countryside, green spaces and existing habitats, thereby rendering the objectives incompatible. However, the Strategic Objectives have been defined to reflect identified key issues, align with national policy and ensure an appropriate balance between the different elements of sustainability. They are cross-cutting in their nature and cross-reference the goals and objectives of the Well-being of Future Generations (Wales) Act 2015 and Bridgend Local Well-being Plan. Acting together, the Vision and Strategic Objectives provide an

overarching framework to underpin all other components of the Replacement LDP.

- 7.4 Conversely, other representors felt Specific Objective 2c (to deliver the level and type of residential development to meet the identified needs of the County Borough ensuring that a significant proportion is affordable and accessible to all) lacked ambition. It was argued that this objective reflected the minimum requirement in terms of meeting national policy and suggested that the Plan should further promote the role new housing has to play in supporting economic growth, locally and regionally. However, this view is not supported by the Council. As documented within the Strategic Growth Options Background Paper, a range of growth scenarios were analysed and subsequently refreshed to determine the most appropriate level of growth to deliver the Replacement LDP's Vision, Key Issues, Aims and Objectives.

2. Do you have any comments to make on the growth strategy?

Over-Development and Out-Commuting

- 7.5 Numerous members of the public opposed the level of growth in the Replacement LDP, citing concerns that the growth strategy seeks to transform Bridgend into a commuter belt for Cardiff and the M4 corridor. The same representors were generally opposed to growth in Bridgend County Borough *per se*, suggesting it was not necessary or desirable for the locality to grow any further. However, the first release of data from the 2021 Census has shown that towns and cities on the M4 corridor in south east Wales are growing rapidly, with Bridgend's population growth (4.5%) being the third highest in Wales after Newport (9.5%) and Cardiff (4.7%). The population of Bridgend has increased from 139,178 at the time of the 2011 Census, to 145,500 at the time of the 2021 Census.
- 7.6 These demographic pressures drive the need for housing growth across the County Borough and the Replacement LDP is the fundamental tool to accommodate this growth by planning for sustainable development. If the Replacement LDP did not plan for growth, this would result in lack of investment in infrastructure, insufficient affordable housing provision, out-migration of economically active households and an increasingly ageing local population. In turn, this could impair the County Borough's ability to attract and retain employers and risk economic decline. The Replacement LDP's Growth Strategy is considered the most appropriate to achieve a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the region. This will support economic growth, enable the delivery of key infrastructure, secure affordable housing and improve connectivity without resulting in over-development.

7.7 One of the key aims of the Plan is to minimise the need for out-commuting and promote sustainable development grounded in placemaking principles. The relationship between household formation, housing requirements and employment provision has been very carefully considered to this end. The level of growth proposed is considered the most appropriate to achieve an equilibrium between new homes and employment provision, balanced against other key infrastructure requirements, and connected through enhanced active travel opportunities. Therefore, the Replacement LDP does not seek to transform Bridgend County Borough into a commuter area for Cardiff and the M4 corridor, indeed, this would completely oppose what the strategy is seeking to achieve. Refer to the Strategic Growth Options Background Paper and Employment Background Paper.

Growth Level

7.8 Similarly, other representors cited the level of housing completions in recent years, outlined how this has changed the identify of Bridgend and considered it disproportionate to add further homes to the area during the next plan period. In order to substantiate these points, these representors quoted ONS data, derived from 2011-baed principal projections, to suggest that only 2,000 houses are needed to meet housing needs from 2018-2033. It was also suggested that this level of development could be solely accommodated on the proposed brownfield sites in the Replacement LDP.

7.9 It must firstly be noted that 2011-based projections have now been updated several times, and, as documented within the Strategic Growth Options Background Paper, the Replacement LDP has considered the full suite of 2018-based household projections along with a range of variants in arriving at an appropriate dwelling requirement. Moreover, pursuit of a 2,000-home dwelling requirement would necessitate a three times reduction in dwelling completions compared to that witnessed over the existing LDP period. It would also require pursuit of a growth strategy that is 65% lower than the 2018-based principal household projection. This approach would categorically fail to address the Vision, Aims and Objectives that the Replacement LDP is seeking to address and therefore would represent a high-risk strategy that is likely to be found unsound at examination. It would also fail to align with Bridgend's designation as a National Growth Area within Future Wales. The proposal to reduce the housing requirement to 2,000 homes over the plan period is therefore not supported.

7.10 There were few representations that stated the proposed housing requirement was too low, with many other representors considering the level of homes and jobs proposed to be well justified to inform the housing requirement. Notably, Welsh Government commented that,

“the level of household growth proposed in the Deposit LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over the 2018

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

These comments are noted and only further serve to evidence the appropriateness of the proposed growth strategy.

- 7.11 Nevertheless, and conversely, some commentators felt the Plan lacked ambition or aspiration. Several representors stated that a minimal level of growth was being planned for, although these comments seemingly overlooked the fact that the level of growth proposed is 33% higher than the 2018-based principal projection. One representor recommended pursuing a higher housing requirement of 9,772 dwellings or 13,177 dwellings, the former based on a 29% uplift of the proposed housing requirement and the latter derived from historic migration assumptions from a period of significant economic growth (2001/02–2007/08) with a further uplift applied. In both cases, the Council considers that these proposals have sought to artificially manufacture the highest possible dwelling requirement, through applying arbitrary uplifts, to justify including extra housing sites within the Plan. This is despite these alternative proposals lacking any sound basis or tangible analysis of how they would achieve the Plan’s Key Issues, Aims and Objectives.
- 7.12 In practice, a range of growth options were considered during plan preparation, as detailed within the Strategic Growth Options Background Paper. The Paper concluded that the risk with a higher growth option is that it may place too much emphasis on outright economic growth and could necessitate allocation of excessive greenfield sites on the periphery of settlements, which could promote car-dependency, place undue pressure on existing infrastructure, encourage out-commuting and necessitate unsustainable patterns of movement. This would be at the expense of more placemaking-led sustainable urban extensions and regeneration schemes. This may render it difficult to balance the four strategic objectives and achieve an equilibrium between economic growth and sustainable development. Instead, 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. Such comments that the Plan lacks ambition or aspiration are therefore considered unfounded and are not supported.

Flexibility Allowance

- 7.13 Whilst most representors were supportive of a significant flexibility allowance, some recommended setting a dwelling requirement that includes both the proposed housing requirement and the flexibility allowance as a minimum. However, the flexibility allowance has been set to ensure there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues in accordance with the Development Plans Manual. The allowance itself does not form part of the 'minimum requirement', it has been set in recognition of the fact that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of sites, notwithstanding the robust frontloading of site delivery evidence. As such, the proposal to set the total dwelling provision (inclusive of the flexibility allowance) as a minimum to deliver the dwelling requirement is not supported.
- 7.14 A flexibility allowance of 20% was set at Deposit Stage. This was a purposely large buffer, chosen specifically to enable the Replacement LDP's housing requirement to remain comfortably deliverable if a significant site failed to come forward as anticipated at that point of plan preparation. This scenario has since occurred. 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. This was proposed as a 'rollover' allocation and incorporated in the 2021 Housing Trajectory. 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. The trajectory was initially constructed with enough flexibility to sustain the loss of a site of this scale without impacting upon delivery of the housing requirement.
- 7.15 Post Deposit Stage, an alternative developer-led site (namely, Heol Fach, North Cornelly) was considered as part of the Candidate Site Assessment (2022), although Cabinet resolved not to incorporate this site as a new allocation within the Replacement LDP (refer to Item 8, 19/07/2022 Cabinet Meeting). Cabinet deemed the existing level of flexibility sufficient given the extent of supporting evidence to demonstrate each other proposed allocation is deliverable. Therefore, the Replacement LDP now proposes a 10% flexibility allowance, which is still significant, and will ensure the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur. The Council considers that the total level of housing provision is set appropriately within the Replacement LDP, with a flexibility allowance to ensure delivery of the housing requirement. This is set out in the Housing Trajectory Background Paper.

3. Do you have any comments to make on the spatial strategy?

Overall Spatial Strategy

- 7.16 Numerous representors were broadly supportive of the spatial strategy, although some suggested a slightly different spatial weighting of growth (i.e., with additional growth directed towards Bridgend, Pencoed or Porthcawl and away from other Main Settlements, accordingly). Such suggestions were primarily put forward to help justify inclusion of specific sites being promoted by the respective representors. Other representors felt that options for growth were limited with the Plan only identifying 1 Primary and 4 Main Settlements. However, these proposals and concerns are not supported by the Council. The proposed spatial distribution of housing accords with both the Spatial Strategy and Settlement Hierarchy (refer to the Spatial Strategy Options Background Paper and Settlement Assessment). Numerous deliverable sites have been identified to enable delivery of the housing requirement (refer to the Strategic Growth Options Background Paper) and the justification for the proposed site allocations is clearly set out in the Candidate Site Assessment.

Indeed, Welsh Government concluded that,

“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 underperforming 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”.

Laleston

- 7.17 Nevertheless, certain representors felt that Laleston should form part of the Bridgend Sustainable Growth Area, given its functionality with Bridgend and the presence of an active travel route. On this basis, it was argued that Laleston should not be overlooked as a sustainable location for growth, particularly via residential development on land immediately to the west of the settlement. However, this suggestion is not supported by the Council. The Settlement Assessment 2019, Revised 2021, clearly identifies Laleston and Merthyr Mawr as a Local Settlement and significant growth in Laleston would not accord with this classification. This is equally referenced in the Candidate Site Assessment, which also states that new development should be contained within the existing settlement boundaries of Local Settlements. The Council considers there to be more sustainable options to accommodate growth within the extant Bridgend Sustainable Growth Area as defined by the Replacement LDP. Local Settlements perform a more limited retail and community facility function, primarily serving

their local residents, and their scope to accommodate significant development is more limited. The land to the west of Laleston is located outside the proposed settlement boundary and is therefore considered to represent an unacceptable incursion into open countryside. The Spatial Strategy is justified in the Spatial Strategy Options Background Paper, the final selection of proposed allocations is detailed within the Candidate Site Assessment and the Replacement LDP identifies the level of growth attributable to Local Settlements outside of Growth Areas.

'Roll Over' Allocations

- 7.18 Several representatives also raised concerns regarding the number of significant brownfield sites that have been 'rolled over' from previous plans, with references made to site deliverability history. These concerns extended to sites within Porthcawl, Bridgend, and, in particular, Maesteg. The Maesteg sites were highlighted as particularly challenging due to their physical constraints and questions were also raised as to whether there is market demand for the number of homes proposed in this area. Such representatives suggested that the Council should consider allocating an alternative mix of sites, including more greenfield sites, to ensure delivery rates can be sustained over the plan period.
- 7.19 However, before being 'rolled over' into the Replacement LDP, all existing allocations were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. While flood risk issues have now necessitated removal of one 'rollover site' from the housing trajectory (Parc Afon Ewenni, Bridgend), the Porthcawl Waterfront allocation is still considered deliverable. The Council has assessed a large body of technical evidence that demonstrates there has been a substantial change in circumstances and the site can be delivered over the Replacement LDP period. Porthcawl Waterfront has therefore been incorporated within the housing trajectory as a deliverable component of housing supply.
- 7.20 In contrast, there are also three brownfield regeneration allocations within the existing LDP that the Council intends to re-allocate as Long-Term Regeneration Sites. These include Maesteg Washery, Coegnant Reclamation Site (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg). The retention of such sites represents a necessary degree of continuity with the first adopted LDP, which is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. However, in accordance with national policy, the Plan's housing trajectory will not be dependent on delivery of these Long-Term Regeneration Sites, recognising that they require longer lead-in times, preparatory remediation-based enabling works and/or more detailed strategic master plans before they can come forward.
- 7.21 Overall, the Council has adopted a contrasting approach to re-allocating extant brownfield allocations based on site-specific circumstances in strict accordance

with the Development Plans Manual. The Spatial Strategy seeks to maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites in accordance with the site search sequence and seek to minimise pressure on BMV agricultural land. This approach stringently follows the Site Search Sequence outlined in Planning Policy Wales (PPW), seeking to promote brownfield development first, where viable.

- 7.22 Given the existing LDP's success in delivering development on brownfield land, it is recognised that there are limited, viable brownfield development opportunities remaining. Some additional viable and deliverable greenfield sites will be required to ensure the County Borough's future housing requirements can be realised. These have been assessed through the Candidate Site Assessment (2022) and their delivery rates have been incorporated within the housing trajectory. However, proposals to overlook the remaining viable brownfield opportunities in favour of additional greenfield allocations is not supported, is out of accord with the Spatial Strategy and contradicts national policy. Refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper, Candidate Site Assessment and Minimising the Loss of the BMV Agricultural Land Background Paper.

Porthcawl

- 7.23 In addition to the above, some representors objected to the regeneration-led only strategy for Porthcawl on the basis that reliance on Porthcawl Waterfront is 'exceptionally high risk' and there are no fall-back options to allow for additional housing provision in the settlement. Other representors similarly referenced the fact that the Porthcawl Waterfront site has not been delivered hitherto and yet contributes to a significant proportion of the Replacement LDP's total housing requirement. Several of these representors therefore suggested amending the spatial strategy to enable allocation of several additional greenfield sites on the periphery of Porthcawl instead. However, these objections are not supported by the Council and are out of accord with the Plan's Spatial Strategy.
- 7.24 Porthcawl has been identified as a Regeneration Growth Area as it demonstrates capacity to accommodate growth in a sustainable manner, via the significant brownfield redevelopment opportunity remaining within the existing settlement boundary. This represents considerable potential to attract regeneration-based inward investment that will address a broad range of socio-economic issues and complement community-based regeneration initiatives within Porthcawl. As aforementioned, a detailed body of evidence has been gathered to demonstrate there has been a substantial change in circumstances with regards to the deliverability of Porthcawl Waterfront. This evidence clearly demonstrates the site is a viable, deliverable allocation. The Strategy will enable the site to come forward, maximise affordable housing delivery in a high housing need area and enable delivery of mixed-use development on brownfield land. This approach

accords with the site search sequence outlined in national policy, seeks to minimise pressure on BMV agricultural land and contributes to the full plethora of sustainable placemaking principles detailed in PPW. As such, and as justified in the Spatial Strategy Options Background Paper, the Strategy for Porthcawl is considered sound and the proposal to overlook the regeneration of a viable brownfield site in favour of greenfield sites at the edge of Porthcawl is not supported.

Site Typologies

- 7.25 Several representors cited concerns that the Plan is over-dependent on strategic sites, whilst simultaneously advocating a spatial strategy comprising of a broader range of smaller, edge of settlement housing allocations. It was suggested that this approach would enable growth to be delivered earlier in the plan period as smaller sites can come forward more quickly than larger, strategic sites. It must be acknowledged that such comments were typically made by representors promoting sites that had not been proposed for allocation within the Deposit Plan.
- 7.26 The Strategy primarily seeks to deliver several large-scale Sustainable Urban Extensions, which 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. This 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. This is notwithstanding other infrastructure requirements and planning contributions.
- 7.27 Identification of allocations has been undertaken in accordance with the Site Search Sequence and other requirements set out in PPW, as documented in supporting evidence to the Plan. The proposal to place a greater reliance on small to medium sized greenfield sites *per se* is not supported. Numerous sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infrastructure problems and it is more difficult for such sites to provide their own supporting infrastructure until they reach sufficient critical mass. Therefore, the Replacement LDP has only proposed site allocations where capacity was clearly demonstrated to accommodate the respective level of growth within the settlement and/or necessary facilities and infrastructure improvements could be provided in support of the development. The Deposit Plan did propose four smaller sites on this basis (all of which are due to delivery between 100-150 dwellings, refer to Policies COM1(2)-COM1(5)).
- 7.28 Incorporation of the four sites included at Deposit Stage will ensure the plan is not over-dependent on strategic sites and delivery can come forward in the shorter term.

- 7.29 The final selection of proposed allocations is detailed within the Candidate Site Assessment. The housing trajectory is considered deliverable, as detailed within the Housing Trajectory Background Paper.

4. Do you have any comments to make on design and sustainable placemaking policies?

Good Design and Density

- 7.30 Some representors argued that the the term ‘Good Design’, as used within SP3, needs to be more clearly defined. Reference was made to the fact that the level of placemaking achievable by a development will depend on its scale and location, and, that it would be unlikely for all sites to be able to meet all criteria within this policy. However, the Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with PPW and the definitions therein. Whilst these comments are noted, the policy is considered appropriate in its current form.
- 7.31 Similarly, other representors stated that Policy COM6 is too vague as it fails to define what are higher and lower densities for new housing development. It was argued that the policy should provide a clearer understanding of the densities appropriate within different parts of the County Borough and what constitutes ‘an efficient and appropriate density’. However, COM6 seeks to achieve placemaking principles by enabling mixed, socially inclusive, sustainable communities through a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. Rather than specifying a numeric requirement, COM6 sets the framework to make the most efficient use of land based on the site-specific context. This seeks to ensure an appropriate balance of uses can be pursued in a manner that maximises the density of developments without compromising the quality of the living conditions provided. The policy wording is therefore considered appropriate in its current form.

Masterplans

- 7.32 Reference was made to the fact that many of the allocations are well advanced in the master planning / pre-application process and Welsh Government commented that a visual element would enhance PLA1-5, through masterplans, concept and/or schematic frameworks. It was felt that “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”. These comments are noted and accepted. Illustrative Masterplans will be appended to the Replacement LDP to enhance clarity in these respects. The final masterplans will be refined as part of future planning applications in accordance with the respective masterplan development principles detailed in Policies PLA1-5.

Energy Efficiency and Zero Carbon

- 7.33 Certain representors called for all new buildings (enabled under the Replacement LDP) to be examples of high sustainable design and construction practices. Indeed, SP3 states that development must contribute to creating high quality, attractive, sustainable places that support active and healthy lives and enhance the community in which they are located, whilst having full regard to the natural, historic and built environment. Development proposals must be supported through the submission of appropriate design and technical information to demonstrate compliance with the criteria set out by Policy SP3. Such criteria include responding to the climate emergency by reducing energy demands and maximising opportunities for renewable or low carbon energy generation, incorporating resource efficient/adaptable buildings and layouts using sustainable design and construction techniques. SP4 also requires all development proposals to make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change. However, some representors cited concerns with the requirements of this policy in terms of how it will be measured and also the associated financial implications. Whilst these comments are noted, as specified within SP4, all applications for development proposals must clearly demonstrate how they contribute to climate change mitigation and adaptation through application of the criteria-based policies. The criteria within SP4 require development to both mitigate and adapt to climate change, thereby minimising its underlying causes and planning for its consequences. The policy wording is considered appropriate in its current form.
- 7.34 Other representors emphasised the importance of ensuring ‘green technologies’ are utilised in development, to maximise scope for a zero carbon footprint. The Council has an aspiration for all new homes to be net zero carbon. The Bridgend Local Area Energy Strategy and Renewable Energy Assessment (REA) identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions in combination with different levels of targeted fabric retrofit. Policy ENT10 outlines a sequential approach that requires new major development to demonstrate sustainable heating and cooling systems have been selected in the first instance, where technically feasible and financially viable.
- 7.35 Conversely, some private developers were opposed to certain requirements of ENT10, particularly the requirement for an energy masterplan on all major development (10 dwellings or more). It was instead suggested that a higher threshold should be used as it is not viable to incorporate low carbon heating technologies on small sites. However, the requirement for new major development to be accompanied by an energy masterplan follows the advice contained within paragraph 5.8.4 of PPW (Edition 11), which states,
- “In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies

requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission”.

- 7.36 Policy ENT10 will ensure that new major development is accompanied by an energy masterplan that demonstrates that the most sustainable heating and cooling systems have been selected. This must include consideration of the proposed system as a whole, including the impact of its component materials on greenhouse gas emissions. They must also demonstrate that heating systems have been selected in accordance with the sequential approach set out by Policy ENT2. The proposal to increase the threshold for an energy masterplan beyond 10 units is therefore not supported by the Council.

5. Do you have any comments to make on the active, health, cohesive and social communities policies?

Affordable Housing

- 7.37 Several representors queried if the affordable housing to be secured through the Replacement LDP will be built in high need areas and whether it will be truly affordable for local people. In response, the LHMA has formed a core piece of baseline evidence to influence the scale, type and location of growth within the Replacement LDP. This evidence has directly informed the Spatial Strategy, which seeks to maximise affordable housing delivery in high-need areas (refer to the Strategic Growth Options Background Paper). The Plan’s contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. Affordable housing contributions will be sought on residential developments as set out by COM3. New housing developments must incorporate an appropriate mix of house types, sizes and tenures to cater for the range of locally identified housing needs. All affordable housing provision delivered via the Replacement LDP will comply with the definition outlined in Technical Advice Note 2 and be secured through an appropriate s106 agreement to ensure the resultant products are usefully affordable.
- 7.38 Several representors cited support for the affordable housing targets detailed within COM3. This support extended to both the target percentages for different market areas and the specific targets for certain strategic sites. These representors recognised that the policies had been identified having regard to the LMHA, the Plan Wide Viability Assessment and site-specific viability testing. However, other representors queried why the proposed affordable housing

requirements are higher for some strategic sites than in the respective housing market areas more generally. The rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual,

“much more insight can be gained which can result in refined affordable housing targets, as opposed to the broader area identified in the high level appraisal. The two are not contradictory, rather the site specific being a refinement of the high-level appraisal” (WG, 2020, para 5.89).

- 7.39 Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council’s aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3.
- 7.40 Other representors supported inclusion of the Affordable Housing Exception Site Policy (COM5), although objected to the ten dwelling ‘limit’ detailed within the policy wording. These representors considered it necessary for a more flexible policy to ‘meet the identified affordable housing need’, whilst referring to purposely selected policies from some other local plans as further justification. However, the Council considers that these representors have misinterpreted the purpose of proposed COM5. The Replacement LDP’s affordable housing target has been identified by considering the scale of need identified in the LHMA alongside robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. The Replacement LDP will seek to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. COM5 does not seek to promote significant levels of affordable housing development outside of settlement boundaries to contribute to this target, rather provide a mechanism to meet pressing housing need in limited, exceptional circumstances. The supporting text within the Replacement LDP has been expanded to further clarify this point. Any resultant development will still need to have reasonable access to local community services and facilities in nearby settlements and meet the specified criteria.
- 7.41 A 10-unit cluster is considered the maximum appropriate size for a sustainable cluster of affordable housing on larger housing developments and is equally applicable to an exception site. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities, particularly in a

countryside setting. Whilst some exception policies in alternative local plans may indeed prescribe a different threshold, they are not directly applicable to the Bridgend context. Proposed Policy COM5 will provide a means of meeting very specific identified housing need, small in scale and exceptional in circumstance. No sound justification has been provided to remove the 10 affordable unit limit within Policy COM5 and this proposal is therefore not supported. Refer to the Affordable Housing Background Paper.

7.42 Welsh Government also recommended altering the wording of COM5 to enable the release of affordable housing exception sites “within or adjoining” existing settlements and to include the definition of ‘local need’ within the Plan in accordance with national policy. The policy and supporting text has been amended accordingly.

7.43 Other representors (primarily private developers) challenged the detailed policy requirements for affordable housing clusters of no more than 10 units on mixed-tenure strategic sites. It was argued that this figure should be more flexible to allow for site-specific circumstances and to avoid potential RSL management issues with ‘smaller’ clusters. However, this suggestion is not supported and clusters of up to 10 units are not considered ‘small’ in this context. Indeed, clusters of this nature are actually designed to assist with management of affordable housing in a more sustainable manner than ‘pepper potting’ single units throughout developments. Equally, discrete clusters of more than 10 affordable units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities. Large concentrations of affordable housing within certain parts of residential sites can lead to stigmatisation, social disintegration and unstable communities. As such, the proposed approach is already considered flexible enough and adaptable to site-specific circumstances, having been devised considering routine discussions with RSL housing managers that operate across the region. Refer to the Affordable Housing Background Paper.

Windfall Allowance

7.44 Some representors raised concerns over the Plan’s windfall allowance (for both small and large windfall sites), on the basis that it accounts for 11.5% of the total housing provision, yet is subject to unallocated sites becoming available, market fluctuations and land availability. However, the future windfall extrapolation rate has been carefully considered and is based on robust evidence. Firstly, to avoid the future extrapolation rate being skewed by particularly high or low trends, a fifteen-year average was calculated over the whole existing LDP period (2006/07 to 2020/21). This period is considered the most robust for this purpose as it encompasses the recession, the subsequent repercussions and the following years of economic recovery. Secondly, the Replacement LDP seeks to broadly continue with the existing LDP’s Regeneration-Led Strategy (along with some additional sustainable growth), and maintain similar settlement boundaries,

thereby rendering past windfall completion trends a robust reference point. Thirdly, an Urban Capacity Study (UCS, 2020) was published alongside the Deposit Plan to provide further analysis of the potential urban capacity of the County Boroughs' settlements for housing to evidence the expected small and windfall site allowance rate. This UCS was updated in 2022 and still identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this component of housing supply. It therefore demonstrates (in addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP. The concerns raised are therefore unsubstantiated and not supported. Refer to the Housing Trajectory Background Paper and UCS (2022).

Recreation Space

- 7.45 Several concerns were raised regarding new development *per se* and the loss of public open space, particularly in relation to the negative impact this could have on the wellbeing of residents. However, the Council has undertaken an updated Outdoor Sport and Children's Play Space Audit (2021), which is a quantitative analysis of existing formal and informal provision compared with the benchmark standards endorsed by Fields in Trust (FiT). The Audit has a dual purpose and can be used as a means of safeguarding or enhancing existing facilities, whilst also providing evidence to justify the provision of new facilities and/or remedy local deficiencies in provision as appropriate. Proposed Policy COM10 requires provision of a satisfactory standard of outdoor recreation space on all new housing developments, to be informed by the findings of the Audit and other supporting evidence to the Plan. Equally, the proposed Thematic Policies (PLA1-PLA5) detail site-specific requirements for the mixed-use Strategic Development Sites in this respect. On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG.
- 7.46 The Council has also undertaken a Green Infrastructure Assessment to guide and shape the planning and delivery of green infrastructure throughout the County Borough. The assessment summarises the findings of the aforementioned Audit, whilst also adopting a holistic approach to include green infrastructure assets (such as allotments, cemeteries, woodlands, broad habitats) and the Integrated Network Maps. As such, the assessment will provide a mechanism to ensure green infrastructure forms an integral and significant part of development and wider infrastructure proposals. Development proposals, including strategic site allocations, will be expected to maintain, protect and enhance Bridgend's green infrastructure network and ensure that individual green assets are retained wherever possible and integrated into any new development.

Supporting Infrastructure

- 7.47 Lack of existing infrastructure was commonly mentioned by representors as a reason to resist any further growth within the County Borough. Many members of the public raised concerns with the impacts additional housing could have on school capacities, primary healthcare, traffic congestion, utility provision and other community infrastructure. However, the provision of supporting infrastructure to accompany growth has been a primary consideration throughout preparation of the Replacement LDP. Infrastructure providers have been engaged at key stages and an Infrastructure Delivery Plan (IDP) has been produced, which provides a single schedule of all infrastructure necessary to render development acceptable in planning terms. All allocations will need to deliver appropriate supporting infrastructure, as referenced within the IDP, to enable the quantum of proposed development within the plan period to proceed. Without exception, all proposed residential allocations are supported by a large body of technical and viability evidence to demonstrate their deliverability and show that they can fund necessary supporting infrastructure.

Gypsy and Traveller Provision

- 7.48 Several representors queried why there is need to provide Gypsy and Traveller sites and instead suggested that Gypsies and Travellers should move into social housing or travel elsewhere instead. However, the Council has a statutory duty to carry out an assessment of the accommodation needs of Gypsies and Travellers under Part 3 of the Housing (Wales) Act 2014 and to meet any identified need for additional pitches under section 56 of the Mobile Homes (Wales) Act 2013. PPW also clarifies that “where a Gypsy and Traveller Accommodation Assessment (GTAA) identifies an unmet need, a planning authority should allocate sufficient sites in their development plan to ensure that the identified pitch requirements for residential and/or transit use can be met” (para 4.2.35). One other representor queried what other potential sites had been considered, for comparison purposes, although this is detailed in the Gypsy and Traveller Site Options Background Paper. Another representor was in support of the Plan accommodating Gypsy and Traveller needs on the basis that ‘everybody needs somewhere to live’. Numerous representations were received specifically regarding the proposed Gypsy and Traveller allocations within Court Colman (SP7(1)) and Bryncethin (SP7(2)), which will now be summarised in turn.
- 7.49 In terms of the Court Colman (SP7(1)) proposal, representors commented that the allocation appears to be missing on the Plan’s key, although ‘Gypsy and Traveller Provision – SP7’ was identified on the Deposit Plan Proposals Map Key and the site was demarcated on page 21. The same representors also referred to the fact that there is another site less than 1 mile away (within Aberkenfig). However, that site is privately owned by a third party, the Council has no

nomination rights as to who may occupy the site and it cannot be relied upon to meet the identified accommodation needs of another family. Concerns were also raised regarding the impact this development may have on the ward and immediate area, particularly in a rural area of natural beauty, which is considered to have high ecological value. However, the proposed allocation has been subject to a SA along with Policy COM8, which provides associated development management criteria, and is considered to provide adequate policy level mitigation in this respect. Representors also requested that the Council consider an alternative, more appropriate site outside of the ward, although a search sequence has already been conducted and is documented in the Gypsy and Traveller Site Options Background Paper. Conversely, one representor felt that the Gypsy and Traveller allocation is 'better suited' to the Pen y Fai / Court Colman area on the basis that there are less homes surrounding the immediate site and any development will not directly impact residents.

- 7.50 In terms of the Bryncethin (SP7(2)) proposal, several residents stated that the development would be 'unwelcome' and not of any benefit to the local area. A range of reasons were provided in objection to the allocation, including: the area is already busy enough without more residents, crime rates may increase, anti-social behaviour may increase, properties may be de-valued, the area may be stigmatised, dogs could attack nearby livestock, animals could be abused at the site, the occupants may not be in employment, the elderly could be made to feel vulnerable, and residents may want to move away. However, the issues raised were largely not planning matters. Other representors stated that the proposal would result in a loss of recreation space, as the site was once earmarked for sports fields. However, the allocation proposed (SP7(2)) was partially situated within an extant mixed used allocation for employment, housing and retail (existing adopted LDP Policy PLA3(14) refers, of which, the latter two elements have not come forward). The allocation proposed allocated only minorly intersected the extant tourist related facility allocation at Bryncethin Clay Pits (existing adopted LDP Policy REG12(5) refers). The more recent planning application (P/21/494/FUL) for provision of 3 rugby fields is to the east of and divorced from the Gypsy and Traveller allocation that was proposed at Bryncethin. As such, the proposal would have not resulted in a loss of recreation space. Other objectors referenced the lack of sewerage connections, potential impacts on highway safety and the lack of a suitable access. However, the Council has maintained ongoing dialogue with Welsh Water regarding sewerage provision and COM8 requires proposals for new or extended sites to be supported by necessary physical, transport and social infrastructure to ensure they do not have an adverse impact on the transport network.
- 7.51 Other proposals were put forward to consider intensifying existing Gypsy and Traveller sites rather than proposing any new ones. The Council has liaised with the families identified to explore a range of options to meet their accommodation

needs. 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. As such, the other proposed allocation at Bryncethin (SP7(2)) is no longer considered necessary and has been removed from the Replacement LDP. Refer to the Gypsy and Traveller Site Options Background Paper.

- 7.52 Welsh Government also commented that, to ensure compliance with legislation and planning policy, the GTAA should be formally agreed by the relevant Welsh Government Minister prior to the examination. In addition, the Council will need to demonstrate at the examination that the sites can be delivered in the identified timescales. The Council submitted the GTAA for approval in December 2020, have liaised with Welsh Government on this matter and remain committed to progressing the GTAA to formal approval. The Council has also liaised with the respective family to ensure the SP7(1) allocation is deliverable.

6. Do you have any comments to make on the employment strategy?

- 7.53 Several representors cited broad support for the overall employment strategy, stating that it expounds the Plan's contribution to sustainable economic growth by detailing how the employment requirement will be met over the plan period. These comments are noted.

Out-Commuting

- 7.54 A few representors cited concerns that the number of homes proposed in the County Borough would transform the character of the area, no jobs would accompany the growth and the locality would effectively become a commuter belt for Cardiff and Swansea. On this basis, it was argued that the County Borough should not accommodate any further growth as adding more housing would 'take the town feel out of the area'. In response, the Replacement LDP evidence base has evaluated a comprehensive range of growth options and analysed the link between different levels of population change and the size and profile of the resultant resident labour force. This has ensured development of a Growth Strategy that is most appropriate to achieve an equilibrium between the number of economically active people remaining within and moving into the County Borough plus the number of employers relocating and/or expanding

within the same vicinity. A key aim of the Plan is to minimise the need for out-commuting. The relationship between housing growth and employment provision has been very carefully considered to this end. Therefore, the Replacement LDP does not seek to transform Bridgend County Borough into a commuter area for Cardiff and Swansea; this is the opposite aim of what the strategy is seeking to achieve. The level of growth proposed is considered the most appropriate to achieve an equilibrium between new homes and employment provision, balanced against other key infrastructure requirements, and connected through enhanced active travel opportunities. This is detailed further within the Employment Background Paper.

Repurposing of Employment Sites

- 7.55 Some representors referenced recent trends and suggested that Policies ENT2 and ENT3 should maximise flexibility for the repurposing of employment sites, allowing development to respond to market conditions and market signals if necessary. It was argued that restricting development on employment sites to B Use Classes only 'may be counterproductive in making the most efficient use of land and driving economic prosperity'. Instead, it was claimed that greater flexibility could be achieved by including other employment generating uses, including non-B-class uses.
- 7.56 The Council is aware that there is significant pressure for certain uses of this nature on employment sites, notably those falling within Class D2, such as cinemas, children's soft play centres, indoor/outdoor activity centres and fitness/sports centres, which by their very nature, require a large space, often with significant headroom. In order to maintain a sustainable level of employment land, and based upon the recommendations of the EEBS, the Council will protect the sites detailed in ENT2 for employment purposes. The safeguarding of existing sites and premises, where appropriate and necessary, will help to meet the employment needs of the local and wider economy by providing accessible sources of employment (refer to the Employment Background Paper). The intensification and refurbishment of sites and premises identified within ENT2 will also be acceptable in principle, subject to proposals satisfying other policies in the Plan.
- 7.57 ENT3 outlines criteria to determine applications for non-B uses on such sites. However, to deliver the 'Town Centre First' approach outlined within PPW and Future Wales, the Replacement LDP seeks to direct facilities and services to town centres in the first instance. Therefore, before any non-B uses are permitted on allocated employment sites, applicants must demonstrate that other sites within town centres, and the sequential hierarchy detailed in SP12, have been investigated and found to be unsuitable. Proposals for non-B uses will also need to demonstrate that either the existing use is inappropriate or that the land or

premises is surplus to the requirements of the employment market. As such, the Plan is considered flexible enough to respond to the market accordingly.

Ty Draw Farm, North Cornelly

- 7.58 Arguments were also put forward to de-allocate Ty Draw Farm, North Cornelly ENT1(11) as an employment site and either re-allocate it as a residential site or change it to 'white land' within the settlement boundary. Representors argued that the site is undeliverable as an employment allocation because it has been unsuccessfully marketed for this use and not taken up despite being allocated for employment for 'over 40 years'. Instead, comments were made that the site is 'highly sustainable' and 'presents an appropriate, viable, and deliverable (in the short term) housing allocation'. However, the remaining employment portion (2.23ha) of the site is now considered to be materially different proposition to the entire greenfield site (6.1ha) that had been marketed unsuccessfully for development over the period mentioned. The site was re-allocated from a 100% employment site to a Regeneration and Mixed-Use Development Scheme within the existing adopted LDP (2006-2021). Planning consent for a 'hybrid' scheme was granted in 2014, including full consent for residential use to the south of the site and outline consent for employment use to the north. An access off the main estate road was also required to be provided to enable the employment development to be completed.
- 7.59 The residential element of the site was complete by the end of 2016/17, although the site owner did not submit a re-profiling scheme for the employment part of the site within the time limits specified by the Section 106 agreement. As such, while the representor has cited extensive marketing of the remaining 2.23ha, the Council's view is that the site has yet to be marketed to its full potential as more modest, yet accessible, serviced employment opportunity. In order to properly test the market and seek to progress initial enquiries further, the Council considers that proactive investment in levelling works to provide a development plateau, as per the original hybrid planning consent, would enable the site to come forward for the employment use intended. The Replacement LDP will cover a period up until 2033 and the site materially changed when the residential development was completed by the end of 2016/17. In the context of a fifteen-year plan, only five years has passed since this time, and two of those years were heavily influenced by the impacts of the global pandemic. It is therefore considered that the findings of the Economic Evidence Base Study (EEBS, 2019) and Update (2021) are still entirely relevant, and it is reasonable to give the site more time to come forward before concluding that it should be released as an employment allocation. The employment site has not yet been readied for the market and the owner has not yet fulfilled the original commitment to undertake the enabling works as required by the Section 106 Agreement. As such, this proposal is not supported. Refer also to the Employment Background Paper.

Brackla Industrial Estate

- 7.60 Proposals were also put forward for the Replacement LDP to 'take a more nuanced approach' to the employment allocation at Brackla Industrial Estate (ENT1(3)) to reflect recent proposals for the site. It was argued that the allocation should not be constrained to B1, B2 and B8 uses, rather expanded to include education and retail uses as well to assist in the area's regeneration. However, Brackla Industrial Estate was identified in the EEBS as a site that would contribute to future employment land supply, hence the site is allocated within ENT1 for new employment land development of B1, B2 and B8 use classes. Whilst the comments are noted, any alternative proposal would need to clearly justify the loss of employment land in accordance with the LDP policy framework.

Former Ford Site, Bridgend

- 7.61 A representation was also submitted specifically regarding the former Ford Site, Bridgend. It was deemed crucial 'that the potential for the site's redevelopment is sufficiently flexible to cover a range of uses ensuring that its redevelopment potential is future-proofed'. The representor stated the supporting text to Policy ENT5 is positive and references the need for alternative and mixed uses, including residential. However, it was felt that this wording should also be incorporated within Policy ENT5 'to not constrain the sites potential'. In addition, it was argued that a future SPG is not necessary as it will slow down the programme for redevelopment. However, the Council considers that ENT5 already recognises that a unique approach is required to enable redevelopment of the site. The Replacement LDP clearly acknowledges that it will be necessary to enable a flexible mix of economic uses, not necessarily akin to the type and density of uses previously accommodated on the site and no further changes are considered necessary in this respect. The Council will work collaboratively with Welsh Government and the landowners to secure the best outcome for Bridgend. A future SPG is still considered to be a proactive means of specifying the exact nature, type and mix of uses to be developed on the site should an application not be forthcoming in the early part of the plan period.

Porthcawl Employment

- 7.62 Several members of the public raised concerns about the employment strategy for Porthcawl, specifically that the building of over 1,000 homes 'will not create any jobs for residents or future residents once the developments have been built'. Reference was made to the fact that the main job opportunities within the town are hospitality, leisure and retail and the future of those sectors is uncertain. It was also argued that new householders moving into Porthcawl 'will need to

travel out of Porthcawl for their job as the jobs available within Porthcawl are mostly jobs that are in the lower wage bracket’.

- 7.63 However, the Replacement LDP recognises that Porthcawl has an important role in the settlement hierarchy of the County Borough, given that it is a principal centre of services, jobs and community facilities (refer to the Settlement Assessment). As documented within Table 6 of the Plan, the spatial distribution of housing and employment growth broadly reflects the Settlement Hierarchy (SF1) and Spatial Strategy to ensure the development of sustainable places, whilst reinforcing placemaking principles. The imbalance (owing to the lack of ‘B space’ employment land) in Porthcawl is acknowledged, although the Replacement LDP seeks to reinforce employment in the town through planned growth in the commercial, leisure and tourism sectors. PLA1 sets out clear principles for the waterfront development to improve linkages along the waterfront and connect with the Eastern Promenade, Porthcawl Town Centre and Porthcawl Comprehensive School, thereby fostering community orientated, healthy, walkable neighbourhoods. This is important to maximise potential for sustainable development at Porthcawl Waterfront to support the existing Town Centre and capitalise on the accessible location. This will help boost the local economy of this existing Main Settlement by increasing the pool of local labour and rendering the centre more attractive for development by closely linking new residential development to employment, recreation and education uses through active travel principles. This is designed to combat potential decline in the town, which may otherwise occur without a lack of economic growth over the plan period.
- 7.64 In addition, and as detailed in the Retail Study (2019), evidence confirms that Porthcawl has a limited convenience retail offer, which the LDP seeks to address by identifying capacity for additional convenience floorspace in Porthcawl. This will increase consumer choice, promote sustainable access to main food shopping facilities and reduce the need to travel by car. Porthcawl has a good comparison offer, which serves its immediate catchment area, and this will be supported by additional economically active households residing within the locality. As a tourist destination, Porthcawl benefits from a wider range of leisure uses than either Bridgend or Maesteg. The Retail Study (2019) identifies an opportunity to develop additional tourist facilities to attract increased levels of visitor spending in the town centre and secure improvements to the public realm, enhancing the vitality and viability of the centre. The proposed regeneration of Porthcawl Waterfront and existing interest from retailers means there is an opportunity to secure further investment in public realm improvements in Porthcawl. New visitor facilities along Porthcawl Waterfront will improve the overall leisure offer and have the potential to increase retail spending elsewhere in the centre by enhancing the attraction of Porthcawl to visitors and residents.

7. Do you have any comments to make on retail centres and development policies?

'Town Centre First'

- 7.65 Several comments were made in support of the Plan's 'Town Centre First' approach and general principle of regenerating town centres. Many representors were concerned about the decline of the high street and emphasised the importance of 'improving the town centre offer', stimulating town centre footfall and 'reimagining' the town centre experience. Support was also cited for the retail hierarchy and identification of key/main settlements. As recognised in the Retail Background Paper and Covid-19 Policy Review Background Paper, high streets will continue to change, especially in the short-term, due to the increase in online shopping associated with the pandemic. The resultant impacts may serve to further accelerate changes in town centres and high streets if longer-term consumer spending habits continue to alter. The 2019 Retail Study already identified this trend and highlighted a need for more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. The Replacement LDP has responded to this evidence base to support local businesses and retailers, including local independents. The policy framework recognises that it will be increasingly important for traditional town centres to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.

Retail Floorspace Allocations

- 7.66 One representor commented that Policy ENT6 allocates retail and food and drink floorspace at Southside (Bridgend Town Centre) and Porthcawl Waterfront yet does not prescribe specific retail floorspace allocations for strategic sites. In order to provide 'more certainty', it was suggested that floorspace thresholds should be established for all strategic sites and large-scale residential or mixed-use development allocations.
- 7.67 However, this is not considered necessary and the position is outlined within the Retail Background Paper, informed by the Retail Study (2019) and Retail Study Update (2022). The retail need identified will be met by allocating regeneration sites in or adjacent to Bridgend and Porthcawl Town Centres, the re-use and regeneration of vacant units within commercial centres and via local service centres on new strategic sites. This will be complemented by policies in the Replacement LDP which clearly highlight the circumstances where new retail developments will be acceptable outside the centres in the hierarchy. i.e. where they can demonstrate they will complement existing facilities and can be accessed by sustainable forms of transport.
- 7.68 Policy ENT6 seeks to facilitate the provision of new locally scaled convenience goods retailing provision where the need can be identified. In the case of large-

scale residential developments, there is a case for providing a new retailing centre incorporating other retailing, leisure and commercial uses at a scale and size proportionate to the site as a whole. Masterplan Development Principles are outlined for the Strategic Sites in Policies PLA1-5. The policy framework is therefore considered appropriate in its current form.

Parc Afon Ewenni

- 7.69 One representor requested the allocation of 2,900m² net retail floorspace at Parc Afon Ewenni in order to enable development of the wider allocated site. It was also argued that there is 'substantial overtrading of existing stores' within Bridgend, which was masked by the Retail Study's (2019) approach of forecasting growth from the base year. Hence, the representor stated, 'there is a clear need for further convenience floorspace in Bridgend'.
- 7.70 A refreshed (2022) Retail Study Update has been undertaken to re-examine retail need within the BCBC area. This Study analysed trends affecting the retail sector which may impact and influence local retailing within the county borough and how this may change over time. It also assessed future needs for comparison and convenience retail floorspace to 2033, based on existing market shares. The 2022 Study now evidences capacity for 12,790 sq.m of additional comparison retail sales area floorspace over the whole plan period (up to 2033) of which there is medium-term capacity for 6,291 sq.m sales area (by 2028). The Study recommends that the comparison need identified should be met within existing town centres in the first instance in accordance with Planning Policy Wales' 'Town Centre First' principle. Refreshed primary survey work has shown there is more than sufficient capacity (i.e. vacancies) within town centres to accommodate the comparison retail sales area floorspace identified. Conversely, the 2022 Study evidences less capacity in the convenience goods sector due to the Aldi foodstore commitment at land at Salt Lake, Porthcawl (Planning Application P/21/835/FUL refers). This leaves capacity for just 403 sq.m of additional convenience retail sales area floorspace over the whole plan period (up to 2033), of which, there is no capacity for additional convenience retail floorspace in the short and medium term. The 2022 Study concludes that the strategic sites offer the best opportunity to deliver the shortfall in convenience through local service centres. There is more than sufficient provision to accommodate the small quantum of additional convenience retail sales needed over the plan period.
- 7.71 As outlined in the Retail Background Paper, existing town centres provide the most sustainable, optimal locations for retail and leisure uses. The Replacement LDP (refer to ENT6) seeks to encourage retail proposals to sites in town centres that are well served by existing public transport networks meaning they are best placed to serve residents (including those without access to a car). This strategy has clear social and environmental benefits in terms of reducing car dependency and making use of existing infrastructure, whilst promoting the Town Centre First

principle enshrined in national policy. Moreover, PPW (Edition 11) references the potential impacts of retail developments outside designated retail and commercial centres, including changes “in turnover and trading ability, consumer choice, traffic and travel patterns, footfall, as well as affect centre regeneration strategies and existing or proposed retail sites allocated in the development plan” (para 4.3.25). PPW also states, “all retail planning applications or retail site allocations of 2,500 sq. metres or more gross floorspace that are proposed on the edge of, or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment” (para 4.3.26). The representor’s proposal (to allocate 2,900sqm net retail floorspace at Parc Afon Ewenni) is above this threshold, not based on any identified need and not supported by a retail impact assessment. Therefore, the representor’s proposal is not supported and would be of detriment to the Town Centre First principle enshrined in national policy and promoted by the Replacement LDP Strategy.

Bridgend Shopping Centre

- 7.72 A further representation was submitted in relation to the Bridgend Shopping Centre, which referenced that a large part of the centre is within the proposed Primary Shopping Area. It was stressed that the Replacement LDP should provide sufficient flexibility to ensure the centre remains successful, without tempering its ability to attract new uses and maintain a low vacancy rate. The representor felt that the Plan should be sufficiently flexible to allow a wide range of uses to be brought forward within Town Centres, including retail, commercial, leisure, education, community and residential.
- 7.73 In response, Policy ENT6 of the Replacement LDP identifies Southside (incorporating land at the Bridgend Shopping Centre) as a key regeneration site where refurbishment and regeneration proposals will be encouraged incorporating a variety of different complementary uses. The LDP seeks to improve the performance of the Town Centre by enabling measures identified in the Bridgend Town Centre Masterplan (2020). This will seek to improve the quality of the town centre environment and promote more flexibility by increasing the range of community, leisure, and social facilities on offer. Encouraging a greater range of uses will help to reduce vacancy rates, which exceed UK average levels. Alongside this, the masterplan identifies town centre wide environmental improvements including green and blue infrastructure improvements, active travel links, new public spaces to facilitate social distancing, tree planting, heritage trails and building character and street art improvements.
- 7.74 The Replacement LDP already acknowledges that town centres need to diversify if they are to retain their vitality and viability. The range and variety of shops and services has changed over time and will continue to evolve. However, there is a need to ensure that commercial centres do not lose their ‘critical mass’ of retail

units to the extent that they can no longer function as viable shopping centres. Accordingly, there is a need to strike a balance between retailing and non-retailing uses in commercial centres to ensure the optimum mix, and thus enhance the vitality and viability of those centres. Policy ENT7 recognises that the Primary Shopping Areas of the County Borough's town centres need protection from competing uses. Primary shopping frontages can complement ongoing public realm pedestrianisation and town centre regeneration objectives, which seek to increase the retail offer of the centres in a pleasant, attractive environment. As such, the policy framework is already considered flexible enough in this respect.

Porthcawl Food Store

- 7.75 Numerous representors submitted comments in opposition of the proposed food store at Porthcawl Waterfront, primarily due to its prominent location on the seafront, commenting that it will have a negative visual impact on the gateway into Porthcawl. It was argued that construction of over 1,000 dwellings and a food store 'does not lend itself to making Porthcawl a premier seaside resort neither will it make a difference to tourism'. Conversely, several representors were in support of the proposed food store on the basis that it will provide 'a little employment' and attract more people into the town with the accompanying travel links.
- 7.76 As outlined within the Retail Study (2019) and Update (2022), Porthcawl Town Centre has a limited convenience offer, which is significantly below the UK average. Although the centre contains a range of smaller food stores suitable for top-up shopping, there is only one large supermarket suitable for main food shopping. This provides limited consumer choice and means that most residents must travel to other centres to meet their needs. The food store site forms a key element of the wider masterplan that has been developed for Porthcawl Waterfront. A robust tender process was utilised to enable development of the food store, whereby each bid was carefully assessed against a planning development brief. The brief required bidders to submit high-quality, bespoke designs for premises that could act as 'gateway buildings' as well as incorporating appropriate access and active travel arrangements. The development brief for the food store site does not prescribe a particular architectural approach, but it does require clear attention to "place-making", taking in account the historic urban form and scale of the surrounding area. This will enable a development designed for social interaction and enjoyment whilst responding to and celebrating the maritime setting, cultural and heritage of Porthcawl. The food store is intended to act as a precursor to, and catalyst for, future phases of development across the wider site. This will include all-new residential, leisure, retail development at Salt Lake as well as new areas of green open space, a bus terminus and active travel facilities. As well as providing residents with greater choice and more flexibility, the development is intended to

unlock funds that will be reinvested into local infrastructure improvements within Porthcawl and further stages of the regeneration plans. Planning consent has since been issued for this development (Ref:P/21/835/FUL).

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

Minerals

- 7.77 Welsh Government referenced that the second review of the Regional Technical Statement (RTS2) has been endorsed by Bridgend County Borough Council. This identifies no allocations are required in the plan for the production of crushed rock or sand and gravel. Whilst all authorities in the Cardiff City Sub-Region have agreed a Statement of Sub-Regional Collaboration, Welsh Government highlighted that this statement does not form part of the Council's evidence base and this must be included when the plan is submitted for examination. These comments are duty noted and the Council will seek to resolve this issue prior to examination.
- 7.78 In addition, Welsh Government stated that whilst the quarries and their buffer zones have been identified spatially on the proposals map, there is no corresponding list in Policy ENT14. Therefore, Welsh Government recommended that a list should be included in the policy to clearly identify the location of the mineral operations and their buffer zones. Policy ENT14 seeks to control development within mineral buffer zones around existing quarries and mineral operations and a corresponding list has now been added to Policy ENT14.

Renewable Energy

- 7.79 One representor cited concerns about the REA as a basis for policy formulation and target setting, notably arguing that the derived targets within Table 10 are unclear. However, the REA has been carried out in accordance with the REA toolkit, which is identified within PPW as it provides a methodology for developing an evidence base to inform spatially based renewable energy policies for inclusion within LDPs. The REA was prepared by the Carbon Trust to underpin the Replacement LDP, has been signed off by Welsh Government and is considered a 'sound' platform on which to base the renewable energy policies.
- 7.80 The same representor also argued that greater reference should be made to Future Wales' Pre-Assessed Areas (PAA), whilst highlighting that Councils should take the PAAs directly into their new development plans without amendment. In response, enhanced references have been made to the Local Issues and Drivers (LS3), although further changes are not considered necessary as the Replacement LDP will identify the PAAs and does not seek to make any amendments to the PAAs identified.

7.81 Some representors cited concerns regarding the financial constraints of renewable energy requirements. However, no changes are considered necessary to the policy framework in this respect. The Council has an aspiration for all new homes to be net zero carbon. Future Wales identifies Bridgend as a 'Priority Area for District Heat Networks' and requires planning authorities to identify opportunities for district heat networks and plan positively for their implementation. The Bridgend Local Area Energy Strategy and REA identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions. As such, Policy ENT10 will ensure that new major development is accompanied by an 'Energy Masterplan that demonstrates that the most sustainable heating and cooling systems have been selected. This must include consideration of the proposed system as a whole, including the impact of its component materials on greenhouse gas emissions. They must also demonstrate that heating systems have been selected in accordance with the sequential approach set out by Policy ENT2. Any proposed development will be required demonstrate how the proposal will facilitate a connection to a low carbon heat network, or robustly justify why the connection is not technically and/or economically viable and suggest an alternative approach.

7.82 Correspondingly, another proposal was put forward to set a higher dwelling threshold for an energy masterplan within Policy ENT10 (Low Carbon Heating Technologies for New Development) and ENT11 (Energy Efficiency Provision Within the Design of Buildings). This was suggested on the basis that it is not viable for all major development to incorporate low carbon heating technologies. However, this proposal is not supported. The requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within paragraph 5.8.4 of PPW (Edition 11), which states,

"In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission".

The proposal to increase the threshold beyond 10 units is therefore not considered justified.

9. Do you have any comments to make on the natural and built environment policies?

Natural Environment

- 7.83 Numerous representors cited concerns about the negative effects of development and perceived urbanisation of the County Borough. Arguments were put forward to suggest that development of certain sites would have a detrimental effect on local wildlife, habitats, biodiversity, natural resources, air quality, green spaces and the general rurality of certain areas. However, the Replacement LDP acknowledges that the County Borough has a rich and varied biodiversity with a broad range of species, habitats and unique landscapes. Policies have been refreshed and updated from the existing LDP and will continue to protect the County Borough's environment in line with national planning policy and the Environment Act 2016. These policies cover development in the countryside, special landscape areas, nature conservation sites, trees, hedgerows, green infrastructure, natural resources and public health. Additionally, the Council has undertaken a Green Infrastructure Assessment to guide and shape the planning and delivery of green infrastructure throughout the County Borough. The assessment summarises the findings of the detailed 'audit' of the provision of Outdoor Sports and Children's Playing Space within the County Borough, whilst also adopting a holistic approach to include green infrastructure assets (such as allotments, cemeteries, woodlands, broad habitats) and the Integrated Network Maps. As such, the assessment will provide a mechanism to ensure green infrastructure forms an integral and significant part of development and wider infrastructure proposals. Development proposals including strategic site allocations will be expected to maintain, protect and enhance Bridgend's green infrastructure network and ensure that individual green assets are retained and integrated wherever possible.

Built Environment

- 7.84 Similar concerns were also raised in relation to the potential impacts' development may have on historic buildings, local heritage, archaeological remains and other historic assets. However, the Replacement LDP recognises the importance of the historic environment and its fundamental role in distinctive and natural placemaking. The impact of any development proposal will be required to be fully considered by applicants through the preparation of a heritage impact assessment and statement (refer to SP18). This will be used to assess the significance of any development proposal on the heritage values of individual historic assets, their setting and their contribution to local distinctiveness and character. In addition, Development Management Policy DNP11 seeks to ensure that, where a development proposal affects a listed building or its setting, special regard must be had to the desirability of preserving the building, or its setting, or any features of special architectural or historic interest which it possesses.

- 7.84 The Replacement LDP is also accompanied by an SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components 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).
- 7.85 In accordance with statutory requirements, PPW 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 site allocations. Any sustainability impacts would also depend on the scale of development proposed.

10. Key proposals for Maesteg and the Llynfi Valley

- 7.86 Several representors were supportive of the approach to allocating Long-Term Regeneration Sites in the Maesteg and Llynfi Valley, thereby recognising that they require longer lead-in times, preparatory remediation-based enabling works and/or more detailed strategic master plans before they can come forward.
- 7.87 However, some representors raised questions about the number of homes proposed within Maesteg and the Llynfi Valley, based on concerns regarding market demand and deliverability. However, the retention of such sites represents a necessary degree of continuity with the first adopted LDP, which is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. Before being 'rolled over' into the Replacement LDP, all existing allocations were subject to robust re-assessment of their sustainability, deliverability and viability. Three brownfield allocations within the

existing LDP (Maesteg Washery, Coegnant Reclamation Site (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg)) are proposed for re-allocation as Long-Term Regeneration Sites. The Council remains committed to delivering these sites, although, in accordance with national policy, the Plan's housing trajectory will not be dependent on their delivery. Refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper, Candidate Site Assessment and Minimising the Loss of the BMV Agricultural Land Background Paper.

- 7.88 Several other representations were submitted in support of the three sites proposed for allocation at Pont Rhyd-y-Cyff (COM1(3-5)). The representors confirmed that the sites are considered deliverable in the short-term and are anticipated to come forward within the early stages of the Replacement LDP period. Support was cited for the 15% affordable housing targets specified for each site and it was acknowledged that the developments will assist in delivering housing growth in accordance with the growth strategy. These comments are duly noted.

11. Key proposals for Porthcawl, Pyle, North Cornelly and Kenfig Hill

Land East of Pyle (SP2(5))

- 7.89 Some representors raised concerns about the deliverability of Land East of Pyle due to the involvement of several landowners, viability considerations and the lack of significant recent housing delivery in Pyle. However, as documented in the Candidate Site Assessment, the Land East of Pyle site promoter has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. A detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver a high-quality new community. Contrary to the concerns raised, all landowners are committed to working towards ensuring a development site that can be delivered as a comprehensive development. The related housing trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at Stakeholder Group Meetings. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the latest Stakeholder Group Meeting.

7.90 Other representors argued that Land East of Pyle should be de-allocated from the Replacement LDP (on the basis of its scale) and re-considered for allocation within the forthcoming Strategic Development Plan (SDP) instead. Nevertheless, work on the SDP has not yet commenced and site thresholds have not yet been defined through this process. The Bridgend Replacement LDP is being prepared in advance of the forthcoming SDP and is bound by a Delivery Agreement. A range of plan preparation options were considered in the Review Report before work on the Replacement LDP began. The Review Report recommended that the Council undertakes a full review of the existing LDP on an individual Local Planning Authority (LPA) area basis, wherever possible working collaboratively with other LPAs to produce a joint evidence base and with the region to prepare an SDP. Whilst the Council remains committed to the SDP process, the site promoter has clearly demonstrated that Land East of Pyle is both viable and deliverable during the Replacement LDP period, in accordance with the Growth and Spatial Strategy. In terms of cross boundary implications, Bridgend County Borough Council has remained in dialogue with Neath Port Talbot County Borough Council through plan preparation. Neath Port Talbot County Borough Council has submitted formal representations on the Bridgend Deposit Plan and cite no objections to this proposed allocation and support the Replacement LDP. In addition, the number of dwellings Land East of Pyle is expected to deliver during the Replacement LDP is similar in scale to the other proposed strategic sites. Therefore, it is not considered appropriate to de-allocate the site or delay progress on site progression until a future SDP is adopted.

Porthcawl Waterfront SP2(1)

7.91 Several representors raised concerns about the deliverability of Porthcawl Waterfront, with some proposing its re-allocation as a Long-Term Regeneration Site and others recommending postponement to the site's housing trajectory. However, these proposals are not supported. Porthcawl Waterfront was subject to robust re-assessment of its sustainability, deliverability and viability credentials in the same manner as all other candidate sites. There has been a substantial change in circumstances to demonstrate this site can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment). With Phase 1 and Phase 2 now running in parallel, there is now no reason why both phases will be unable to progress and come forward together, as further evidenced by the extensive supporting deliverability evidence.

7.92 Numerous members of the public opposed the re-allocation of Porthcawl Waterfront for a range of reasons, including potential negative impacts on wellbeing, infrastructure, the street scene, the seascape/landscape, the environment, flooding, traffic, parking provision, tourism provision, leisure

provision and job creation. However, Porthcawl has been identified as a Regeneration Growth Area as it demonstrates capacity to accommodate growth in a sustainable manner, via the significant brownfield redevelopment opportunity remaining within the existing settlement boundary. The Replacement LDP seeks to maintain Porthcawl's role as a Main Settlement capable of supporting regeneration-led growth, recognising its accessibility, availability of amenities and employment provision in the context of its existing population base. Porthcawl Waterfront demonstrates considerable potential to attract regeneration-based inward investment that will address a broad range of socio-economic issues and complement community-based regeneration initiatives within Porthcawl.

- 7.93 As part of the proposed allocation, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (refer to PLA1). 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. The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components of the Plan, with appropriate mitigation measures incorporated. A Placemaking Strategy has been developed and produced, which provides the framework to deliver the broader vision for Porthcawl. This 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 proposes to retain and improve upon areas of attractive open space, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site. 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.

12. Key proposals for the Ogmore and Garw valleys

- 7.94 Some concerns were raised regarding lack of investment in the Ogmore and Garw Valleys. However, these localities are identified as Local Settlements. Therefore, whilst these areas will not be earmarked to accommodate significant growth, the Replacement LDP seeks to create sustainable communities linked to wider opportunities in a manner that protects their high-quality environment. It is recognised that alternative forms of development would help deliver smaller-scale growth, such as (but not limited to) co-operative housing, self-build and custom build opportunities alongside other forms of development. Such community investment opportunities will enable development of a scale

and nature that is tailored to community needs, whilst diversifying and strengthening the local economies, connecting communities to wider opportunities and protecting the high-quality environments.

13. Key proposals for Bridgend and Pencoed

Parc Afon Ewenni, Bridgend COM1(1)

- 7.95 Several representors raised concerns about the deliverability of Parc Afon Ewenni, Bridgend, with some proposing its re-allocation as a Long-Term Regeneration Site and others recommending postponement to the site's housing trajectory. 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.

Land South of Bridgend (Island Farm) SP2(2) and Craig y Parcau COM1(2)

- 7.96 Numerous representors opposed the allocation of Land South of Bridgend (Island Farm) and Craig y Parcau, Bridgend for a range of reasons. These included potential pressure on infrastructure, air quality concerns, highway safety concerns, loss of landscape and potential detriment to visual amenity, history, archaeology, woodland and biodiversity.
- 7.97 In response, Bridgend has been identified as the Primary Key Settlement and a Sustainable Growth Area. The Replacement LDP considers such Growth Areas as most conducive to sustainable urban growth and appropriate urban expansion in a manner that will ensure the County Borough's housing requirements can be met. Sustainable Growth Areas have been prioritised for growth based on their identified local housing need, accessibility, availability of amenities and employment provision in the context of their existing population bases and position in the settlement hierarchy. The rationale for allocation of these sites is detailed in the Candidate Site Assessment. Craig y Parcau is located on the periphery of Bridgend Sustainable Growth Area. The site is well serviced by the Active Travel network which will help foster and promote transit-oriented development. The site is considered to be free of any significant constraints and is considered appropriate for residential allocation. Equally, Land South of Bridgend (Island Farm) is located on the periphery on Bridgend

Sustainable Growth Area, has the potential to provide a new primary school and accommodate the relocation of Heronsbridge Special Educational Needs School in addition to providing up to 850 homes. The site could also provide significant new green infrastructure (including ecological mitigation) by fostering a multi-functional green lung between the site and Bridgend in addition to access improvements. In addition, the site is well serviced by active travel routes of which will help foster and promote transit-oriented development.

- 7.98 Proposed Policy PLA2 prescribes a number of placemaking principles for Land South of Bridgend (Island Farm), which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. A final masterplan must be prepared and agreed with the Council prior to the sites development to demonstrate how these principles will be delivered in an appropriately phased manner. This will need to demonstrate how the development will create a well-connected, sustainable mixed-use urban extension to Bridgend, comprising a number of character areas that integrate positively with the existing landscape, SINC, adjacent Grade II* listed Merthyr Mawr House, existing housing clusters, community facilities, Active Travel Networks and public transport facilities. An illustrative masterplan will also be included in the final version of the Replacement LDP to enable all parties to understand how the site will be developed in broad terms, including proposed land uses, access, infrastructure requirements, constraints and areas of protection. This masterplan will clearly identify the location of the SINC in the context of the wider allocation. The provision of new residential units, including affordable dwellings, will be incorporated alongside a new primary school with co-located nursery, the re-location of Heronsbridge Special School, leisure facilities, recreation facilities, public open space, plus appropriate community facilities, employment and commercial uses.
- 7.99 Such requirements also 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 between the site, the Town Centre, Brynteg Comprehensive School and surrounding environs. A full Air Quality Assessment will be undertaken and submitted as part of any future planning application, but the site's location and associated planning history suggest that matters relating to air quality would not preclude the development of Island Farm.
- 7.100 The Replacement LDP is also 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. For Land South of Bridgend (Island Farm), the SA identified the potential for adverse impacts due to the proximity of the site to scheduled monuments and listed buildings. However, the requirements under SP2 (for each strategic site allocation to be supported by a detailed masterplan) and PLA2 (for the proposed strategic site allocation to implement specific masterplan development principles) represent forms of mitigation to help address the identified likely significant effects.

Merthyr Mawr

- 7.101 Correspondingly, many representors were opposed to development near Merthyr Mawr and proposed that the Replacement LDP should seek to protect the area. However, the land surrounding Merthyr Mawr is recognised within the Replacement LDP and is very much protected by various designations and policies (see Appendix 25 – Special Landscape Designations and Appendix 26 – Landscape Character Assessment). As highlighted by Policy SP17, the historic landscape of Merthyr Mawr Warren is a National Nature Reserve. These are protected under the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way (CROW) Act 2000, the Natural Environment and Rural Communities (NERC) Act 2006 and the Environment (Wales) Act 2016. Policy SP17 specifically seeks to protect statutorily designated sites of national importance and any development proposal which affects such sites will be subject to special scrutiny to establish any potential or indirect effects. The onus will be firmly placed on any potential developer and/or owner to clearly demonstrate the case for development, and why development should not be located elsewhere on a site of less significance to nature conservation. Sensitive design in conjunction with appropriate planning conditions and/or planning obligations/agreements will be pursued by the local planning authority with a view to overcoming potential adverse impacts on the environmental resource, and to ensure protection and enhancement of a site's nature conservation interest.
- 7.102 Merthyr Mawr Warren is also designated as a Special Landscape Area, in recognition of the surrounding character and quality of the landscape. Policy DNP4 protects such designations from inappropriate development. In order to be acceptable, wherever possible, development within an SLA should retain and enhance the positive attributes of its landscape and seek to remove or mitigate any negative influences. In order to achieve this, the design, scale and location of development should respect the special landscape context. In particular, design should reflect the building traditions of the locality in its form, materials and details and aim to assimilate the development into the wider landscape.
- 7.103 Merthyr Mawr Village is also designated as a Conservation Area in recognition of the area's special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. In considering

development proposals, the Council will seek to resist new development or the demolition of existing buildings unless it would preserve or enhance the character and appearance of the conservation area (refer to Policy DNP11).

Land West of Bridgend SP2(3)

- 7.104 Several other representors also opposed the allocation of Land West of Bridgend due to potential coalescence of communities, pressure on infrastructure, air quality concerns, highway safety concerns, potential loss of landscape and detriment to visual amenity, history, archaeology, woodland and biodiversity. However, the rationale for allocation of the site is detailed in the Candidate Site Assessment. Land West of Bridgend is located on the periphery of Bridgend Sustainable Growth Area. The site has the potential to provide a new primary school and residential growth in Bridgend, which possesses a wide range of services and facilities in addition to sustainable transport links. The site will make an important contribution to meeting the housing need of the County Borough. In addition, the site will also provide significant new green infrastructure in addition to capitalising on and further adding to existing active travel routes of which will foster and promote transit-oriented development. A supporting masterplan and planning statement identifies and mitigates potential adverse impacts upon the Laleston Conservation Area and indicates that there will not be any significant changes to its visual setting.
- 7.105 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 (refer to Policy PLA3). The provision of new residential dwellings, including affordable units, will be incorporated alongside a new primary school, recreation facilities, public open space, plus appropriate community facilities all set within distinct character areas. The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components of the Plan, with appropriate mitigation measures incorporated. For Land West of Bridgend, 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.
- 7.106 It is considered that the masterplan framework proposed for the site has been sensitively designed through a landscape and ecology-led approach. Appropriate mitigation measures have been incorporated to address concerns 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.

- 7.107 Proposed 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 significant retained green infrastructure and new areas of public open space across the site. This will comprise of seven key areas of formal open space, informal spaces and linkages, green streets, and sensitive public access to part of Laleston Meadows SINC and woodland.
- 7.108 Proposed Policy PLA3 also 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). PLA3 will also require development to provide a new shared cycle / footway on the northern side of the A473. This will connect the site with active travel routes, 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.
- 7.109 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.

Land East of Pencoed SP2(4)

- 7.110 Some representors cited reservations about the number of units proposed at Land East of Pencoed, given site constraints, whilst also referencing deliverability concerns due to there being no developer on board, hitherto. However, as documented in the Candidate Site Assessment, the Land East of Pencoed site promoter has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. A detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability

assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. Density analysing and proofing layouts have been prepared to evidence the number of dwellings deliverable on the site, taking all constraints into account. The related housing trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at several Stakeholder Group Meetings. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the last Stakeholder Group Meeting. As such, the concerns raised regarding Land East of Pencoed are considered unsubstantiated and are not supported.

14. Do you have any other comments to make on the Deposit Replacement LDP?

- 7.111 Several representors commented that the overall document is long, complex and technical, thereby affecting its 'readability'. However, the Replacement LDP is, by its very nature, a comprehensive spatial planning strategy, underpinned by a wide-ranging evidence base. It must be prepared in the context of current national policy and legislation to ensure the plan is effective, deliverable and contributes to placemaking, as set out in PPW. Whilst the preparation process is long and complex, the Council has sought to ensure that the Delivery Agreement disaggregates the overall process into individual stages to explain, as simply as possible, what each stage involves, factoring in key periods of consultation. A summary version of the Deposit LDP was prepared and published as part of the consultation for ease of reference. All documents were available in main libraries throughout the County Borough in addition to the Civic Offices via appointment. Guides on how to comment and register were available online and the LDP inbox was well used as a means of answering queries. Additionally, dedicated phone lines were made available during weekdays, with officers offering telephone appointments to explain the Plan, its policies and proposals.
- 7.112 Several representors also submitted comments stating the consultation on the Deposit Plan was insufficient and too short. However, the Council went above and beyond legislative requirements in undertaking consultation on the Deposit Plan, in accordance with the Replacement Delivery Agreement and Community Involvement Scheme. When still in a period where Covid restrictions were

continually evolving, it was not deemed appropriate to book public exhibition venues for public drop-in sessions. Reliance on this method of consultation could have risked jeopardising the effectiveness of the consultation if, for example, restrictions were altered, venues were no longer able to accommodate such sessions and officers would have to cancel scheduled public exhibitions. For purposes of deposit consultation, therefore, Council and Welsh Government recognised the need to make greater use of virtual meetings, social media, digital communication, web-based consultation tools, one to one telephone appointments, dissemination of hard copies to individuals and use of external agencies to assist with remote engagement during a period of lasting restrictions. In addition, a longer consultation period (8 weeks, rather than the statutory 6-week period) was approved for these reasons. This range of consultation methods maximised public engagement and all relevant consultation and participation procedures set out in the CIS were undertaken without the need for deviation. These methods were chosen specifically considering the pandemic and proved highly effective, evidenced by the number of representations received on the Deposit Plan (over 1,200).

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Key Issues, Drivers, Vision and Objectives	
General support for the Key Issues, Drivers, Vision and Objectives.	No action necessary.
Concerns the Plan lacks ambition or aspiration in terms of additional housing growth.	View not supported - as documented within the Strategic Growth Options Background Paper, a range of growth scenarios were analysed and subsequently refreshed to determine the most appropriate level of growth to deliver the Replacement LDP's Vision, Key Issues, Aims and Objectives. The Deposit Plan has been underpinned by a balanced level of economic growth and housing provision, based on well informed, evidence-based judgements regarding need, demand and supply factors (refer to 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. Welsh Government confirmed that the Plan's degree of aspiration aligns with Bridgend being within a national growth area as identified by Future Wales.
Concerns that the Plan's proposals for some development on greenfield sites contradicts SOBJ4: To Protect and Enhance Distinctive and Natural Places.	View not supported - the Spatial Strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites in order to accommodate the growth strategy. It continues to focus on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on BMV agricultural land. However, given the existing LDP's success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough's future housing requirements can be realised. Policies PLA1-PLA5 detail the site-specific requirements including masterplan development principles and development requirements. Such requirements will ensure that the environment is not only protected but also enhanced. The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components of the Plan, with appropriate mitigation measures incorporated.
Concern over ordering of Strategic Objectives and that SOBJ4 (To Protect and Enhance Distinctive and Natural Places) is not prioritised.	No action necessary - the four strategic objectives of the LDP are not listed in priority order and are cross cutting in their nature, so should not be considered in isolation. They cross reference the goals and objectives of the Well-being of Future Generations (Wales) Act 2015 and the Bridgend Local Well-being Plan. The development of the Strategic Objectives has also been informed by the SA of the Replacement LDP.
Calls for a better understanding of unseen disabilities within society and the benefits system.	No action considered necessary – the Plan is supported by a wide range of technical evidence and background papers. An SA was prepared to inform the Replacement LDP and to identify the Plan's likely significant environmental and wider sustainability effects. It also considers whether any mitigation and enhancement measures should be incorporated within the Replacement LDP to avoid likely significant adverse effects and to enhance the effectiveness of the plan. One objective of the Sustainability Appraisal is to provide equality and social inclusion for all residents living within the County Borough. Policies within the Plan are predicted to have a positive effect on aspects of this objective. Due consideration has also been given to the Well-Being of Future Generations Act (Wales) 2015, which is a key piece of legislation that aims to further improve the social, economic, environmental and cultural well-being of Wales. The Act has influenced all aspects of the Replacement LDP, which integrally links with each well-being goal and provides a policy context that allows them to be met. Furthermore, an Equality Impact Assessment has been prepared, which is a multi-purpose tool that ensures appropriate steps are taken to comply with the Public Sector Equality Duty Equality Impact Assessment legislation. This demonstrates that due regard

Table 1 – Summary of Responses

Core Issues Raised	Council Response
	has been shown to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the Socio-economic Duty.
Growth Strategy	
General support for the growth strategy and the dwelling requirement, along with the proposed flexibility allowance.	No action necessary - the rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. An appropriate flexibility allowance has been embedded into the Replacement LDP and the basis for which is clearly set out in the Housing Trajectory Background Paper. This will ensure the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur. As such, the total level of housing provision within the Deposit Plan is set appropriately to ensure delivery of the 7,575 dwelling housing requirement.
Proposal to re-word SP1 to make the dwelling provision (inclusive of the flexibility allowance) a minimum to deliver the housing requirement.	Not supported - the total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the dwelling requirement. The flexibility allowance itself is not the minimum requirement, it has been set to ensure there is sufficient flexibility above the dwelling requirement to account for non-delivery and unforeseen issues in accordance with the Development Plans Manual. Refer to the Housing Trajectory Background Paper.
Proposals to increase the dwelling requirement.	Not supported - 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 (refer to the Strategic Growth Options Background Paper).
Proposals to reduce the housing requirement to 2,000 homes over the plan period because ONS' 2011-based principal projections are lower than the Replacement LDP's Growth Strategy.	Not supported – as documented within the Strategic Growth Options Background Paper, the Replacement LDP has considered the full suite of the latest 2018-based household projections along with a range of variants in arriving at an appropriate dwelling requirement. Pursuit of a 2,000-home dwelling requirement, grounded in recession-laden trends, would necessitate a three times reduction in dwelling completions compared to that witnessed over the existing LDP period. It would also require pursuit of a growth strategy that is 65% lower than the 2018-based principal household projection. This approach would categorically fail to address the vision, aims and objectives that the Replacement LDP is seeking to address. It would also not align with Bridgend's national growth area designation as identified by Future Wales. As detailed within the Strategic Growth Options Background Paper, the Replacement LDP proposes the most appropriate scale of economic growth and housing provision 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.
Concerns regarding 'continual' housing growth within Bridgend in recent years and proposals for the County Borough to not accommodate any more growth in the future.	View not supported - if the Replacement LDP did not plan for growth, this would result in lack of investment in infrastructure, insufficient affordable housing provision, out-migration of economically active households and an increasingly ageing local population. In turn, this could impair the County Borough's ability to attract and retain employers and risk economic decline; an approach that would not align with Bridgend's designation as a national growth area within Future Wales. The Replacement LDP's Growth Strategy is considered the most appropriate to achieve a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the region. This will support economic growth, enable the delivery of key infrastructure, secure affordable housing and improve connectivity without resulting in over-development. All reasonable alternatives have also been duly assessed under the SA process and a broad range of growth options have been evaluated within the Strategic Growth Options Background Paper.
Concern over lack of growth in the Ogmore and Garw Valleys.	No action considered necessary - the Ogmore and Garw Valleys are not identified as areas that will accommodate significant growth in recognition of their topographical and viability-based constraints. However, these areas would benefit from community-based regeneration and are therefore designated as Regeneration Areas in recognition of the fact that a range of approaches are required to incite community investment opportunities.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Calls for the growth strategy to be balanced with environmental protection.	No action necessary - the Growth Strategy of the Replacement LDP is one that seeks to balance sustainable growth with environmental protection. Development will ultimately be directed towards environs conducive to sustainable placemaking that facilitate a balance of environmentally friendly, economically vibrant, and socially inclusive characteristics, aiming to benefit current inhabitants and future generations alike.
Spatial Strategy	
General support for the spatial strategy in terms of the scale and location of growth.	Comments noted (refer to the Strategic Growth Options Background Paper, Spatial Strategy Options Background Paper, Housing Trajectory Background Paper and Candidate Site Assessment).
Proposal to alter the Bridgend Sustainable Growth Area Boundary to include Laleston.	View not supported - the Settlement Assessment 2019, Revised 2021, identifies Laleston and Merthyr Mawr as a Local Settlement and significant growth in this vicinity would not accord with this classification. The Candidate Site Assessment clearly states that Laleston is identified as a 'Local Settlement' where new development should be contained within the existing settlement boundary. Refer also to the Spatial Strategy Options Background Paper. Moreover, there are considered to be sufficient deliverable allocations within existing Growth Area boundary as detailed within the Candidate Site Assessment and it is not considered necessary to extend the boundary any further.
Proposals to increase the distribution of housing towards Pencoed.	Not supported - the spatial distribution of housing accords with both the Spatial Strategy and Settlement Hierarchy (refer to Spatial Strategy Options Background Paper). Numerous deliverable sites have been identified to enable delivery of the housing requirement (refer to the Strategic Growth Options Background Paper). The justification for the proposed site allocations is clearly set out in the Candidate Site Assessment.
Proposals to increase the distribution of housing towards Bridgend.	Not supported - the spatial distribution of housing accords with both the Spatial Strategy and Settlement Hierarchy (refer to Spatial Strategy Options Background Paper). Numerous deliverable sites have been identified to enable delivery of the housing requirement (refer to the Strategic Growth Options Background Paper). The justification for the proposed site allocations is clearly set out in the Candidate Site Assessment.
Proposal to re-proportion strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill and North Cornelly' and increase housing numbers in Bridgend.	Not supported - the spatial distribution of housing accords with both the Spatial Strategy and Settlement Hierarchy (refer to Spatial Strategy Options Background Paper). Numerous deliverable sites have been identified to enable delivery of the housing requirement (refer to the Strategic Growth Options Background Paper). The justification for the proposed site allocations is clearly set out in the Candidate Site Assessment.
Proposals to de-allocate brownfield regeneration sites that have been 'rolled over' from the existing LDP.	<p>Not supported - before being 'rolled over' into the Replacement LDP, all existing allocations were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. While flood risk issues have now necessitated removal of one 'rollover site' from the housing trajectory (Parc Afon Ewenni, Bridgend), the Porthcawl Waterfront allocation is still considered deliverable. The Council has assessed a large body of technical evidence that demonstrates there has been a substantial change in circumstances and the site can be delivered over the Replacement LDP period. Porthcawl Waterfront has therefore been incorporated within the housing trajectory as a deliverable component of housing supply</p> <p>There are also three brownfield regeneration allocations deemed suitable for re-allocation as Long-Term Regeneration Sites, although the housing land supply will not be dependent on their delivery. This represents a necessary degree of continuity with the first adopted LDP. The Council has adopted a contrasting approach to extant regeneration allocations based on site-specific circumstances in strict accordance with the Development Plans Manual.</p>
Objections to the regeneration-led only strategy for Porthcawl as reliance on Porthcawl Waterfront is 'exceptionally high risk' and there are no fall-back options to allow for additional housing provision in Porthcawl.	Not supported - the Spatial Strategy is clearly justified in the Spatial Strategy Options Background Paper. Porthcawl is designated as a Regeneration Growth Area and brownfield sites will primarily provide the required capacity to accommodate growth within Regeneration Growth Areas. The total housing provision, and spatial distribution thereof, has been subject to site-specific phasing analysis to enable development of the housing trajectory. A detailed body of evidence has been provided to demonstrate Porthcawl Waterfront is a deliverable allocation. Refer to the Candidate Site Assessment.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Proposals for the Replacement LDP to prioritise more brownfield development.	No action considered necessary - the Spatial Strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites in order to accommodate the growth strategy. It continues to focus on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on BMV agricultural land. However, given the existing LDP's success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough's future housing requirements can be realised. Refer to the Spatial Strategy Options Background Paper and Candidate Site Assessment.
Good Design and Sustainable Placemaking Policies	
General support for 'Design and Sustainable Placemaking' Policies.	No action necessary.
Proposal to remove local policies on design, placemaking, climate change, transport and accessibility and defer to national policies.	No action considered necessary - these policies are considered fundamental to achieve the Vision, Aims and Objectives of the Replacement LDP and to deliver sustainable development in a manner that will achieve sustainable places and maximise the well-being of Bridgend County Borough's residents and communities.
Query on how SP4 (mitigating the impact of climate change) will be implemented and measured.	No action considered necessary - as specified within SP4, all applications for development proposals must clearly demonstrate how they contribute to climate change mitigation and adaptation through application of the criteria-based policies. The criteria within SP4 require development to both mitigate and adapt to climate change, thereby minimising its underlying causes and planning for its consequences.
Challenge PLA11 for seeking to maximise provision of car parking out of accordance with the transport hierarchy detailed within national policy.	No action considered necessary - PLA11 is a Development Management Policy that supports delivery of SP5: Sustainable Transport and Accessibility. The first criterion within SP5 is for development to accord with the sustainable transport hierarchy for planning, which is consistent with Planning Policy Wales. PLA 11's supporting paragraph 5.2.76 further recognises that "the availability of parking spaces and parking charges applied, are key tools in facilitating a reduction in journeys by private car and encouraging a change in mode choice towards more sustainable means of travel". Further local guidance will be provided in a revised future Parking Standards SPG.
Requests for enhanced clarity on the definition of 'Good Design' within Policy SP3.	No action considered necessary - the Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with Planning Policy Wales and the definitions therein. The policy is considered appropriate in its current form.
Proposal for SP3 to include the need for high-speed digital infrastructure in all new developments and Policy COM14's reasoned justification to make clear that broadband infrastructure is a requirement as set out in Future Wales.	Supported - 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 Future Wales.
Recommendation to include a visual element to policies PLA 1-5 through masterplans, concept plans and/or schematic frameworks	Supported – masterplans will be appended to the submission document.
Request for all new buildings, including housing, to be examples of sustainable design and construction.	No action considered necessary - Strategic Policy 3: Good Design and Sustainable Place Making sets out that development must contribute to creating high quality, attractive, sustainable places that support active and healthy lives and enhance the community in which they are located, whilst having full regard to the natural, historic and built environment. As such, there will be a requirement for future development proposals to be supported with appropriate

Table 1 – Summary of Responses

Core Issues Raised	Council Response
	design and technical information to demonstrate compliance with the criteria set out within SP3. Such criteria include responding to the climate emergency by reducing energy demands and maximising opportunities for renewable or low carbon energy generation, incorporating resource efficient/adaptable buildings and layouts using sustainable design and construction techniques.
Proposal to re-word Policy PLA12 to provide more support to schemes that help to enable the Active Travel Network.	No action considered necessary - The wording of PLA12 prioritises the provision of active travel measures within development proposals and places the emphasis on developers to implement appropriate measures in accordance with the Council's Active Travel Network Map and the Active Travel (Wales) Act 2013. The supporting text clearly states that PLA12 supports new developments that incorporate well-designed safe features and facilities that will be accessible to all people to walk and cycle for everyday journeys.
Active, Healthy, Cohesive and Social Communities Policies	
Proposal for COM2 to describe the affordable housing figure as a 'target' rather than a set figure.	No action considered necessary - the contribution the Replacement LDP can make to affordable housing provision has been robustly assessed through plan-wide and site-specific viability appraisals (refer to Plan-Wide Viability Assessment and the Affordable Housing Background Paper). SP6 has been formulated in accordance the wording detailed within paragraph 5.59 in the Development Plans Manual (Edition 3) and COM2 supports delivery of this key housing policy. The affordable housing provision is already clearly identified as a target within the supporting paragraph.
Proposal to merge Policy COM2 with Policies COM3, 4 and 5 (affordable housing).	No action considered necessary - Policy COM2 is the Development Management policy to support delivery of the Strategic Policy 6 (SP6). Whilst related, Policies COM 3, COM 4 and COM 5 provide criteria-based policies for on-site affordable housing provision, off-site affordable housing provision and affordable housing exception sites, respectively. More detailed policy coverage on these distinct forms of affordable housing provision is considered necessary in addition to COM2, all of which support delivery of SP6.
Support for the plan-wide and site-specific affordable housing policies detailed within COM3, although some queries as to why the two vary.	No action considered necessary - the rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual, "much more insight can be gained which can result in refined affordable housing targets, as opposed to the broader area identified in the high-level appraisal. The two are not contradictory, rather the site specific being a refinement of the high-level appraisal" (WG, 2020, para 5.89). Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council's aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3.
Remove requirement for affordable housing in clusters of no more than 10 units (as detailed within PLA1-5 and supporting text to COM3).	Not supported - as outlined in the Affordable Housing Background Paper, in order to facilitate creation of mixed communities, the Replacement LDP seeks to deliver affordable housing secured through section 106 through sustainable clusters of no more than ten affordable units, interspersed throughout the respective developments. Clustering in this manner is designed to minimise management issues that can otherwise result from single units being 'pepper potted' throughout developments. Conversely, discrete clusters of more than 10 affordable units can become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities due to over-concentration of affordable tenures. A careful balance must be achieved and clusters of no more than 10 affordable units is considered optimal to this end, considering routine discussions with RSL housing managers that operate across the region.
Query as to what constitutes 'an efficient and appropriate density' as set out in COM6.	No action considered necessary - the Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with Planning Policy Wales. COM6 seeks to achieve these principles by enabling mixed, socially inclusive, sustainable communities through a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. Rather than specifying a numeric requirement, COM6 sets the framework to make the most efficient use of land based on site-specific context, thereby ensuring an appropriate balance of uses can be pursued in a manner that maximises the density of developments without compromising the quality of the living conditions provided.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Query on how economic infrastructure and renewable energy can be secured as s106 requirements as set out in SP10.	No action considered necessary – the proposed policy wording of SP10 is considered appropriate in its current form. SP10 sets out the holistic requirement for all development proposals to be supported by sufficient existing or new infrastructure, ensuring such provision can be effectively co-ordinated to support the Plan. In order to mitigate likely adverse impacts and/or to integrate a development proposal with its surroundings, reasonable infrastructure provision or financial contributions to such infrastructure must be provided by developers where necessary. The policy wording states that “this will be secured by means of planning agreements/obligations where appropriate” and any such agreements will be subject to Community Infrastructure Levy Regulations and the Tests of Necessity.
Proposal to set a higher dwelling threshold for a Health Impact Assessment within SP8 (change from 10 dwellings to 500 dwellings or more).	Not supported - SP8 reflects the direction in National Planning Policy and Guidance that health can be a material consideration in determining planning applications for new developments and is increasingly recognised as an essential element of delivering sustainable development. As stated in Edition 11 of Planning Policy Wales, “Health Impact Assessment makes a valuable contribution towards plan making. It may be useful when proposing or making decisions on new development along with evidence collected by Public Service Boards. Evidence on health impacts can help the planning system develop stronger and more coherent approaches towards maximising health and well-being” (para 3.24). The policy wording is therefore considered appropriate in its current form.
Concerns raised regarding the deliverability of key strategic sites, notably Porthcawl Waterfront, Parc Afon Ewenni, Land East of Pyle, Land East of Pencoed, Land West of Bridgend and Land South of Bridgend (Island Farm).	No action considered necessary - all strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the sites included within the Replacement LDP are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.
Concerns regarding the housing trajectory, and timing and delivery of sites. Proposals to postpone delivery timescales for large / strategic sites, notably Porthcawl Waterfront, Parc Afon Ewenni, Land East of Pyle, Land East of Pencoed and Land South of Bridgend (Island Farm).	Trajectory refined - the total housing provision, and spatial distribution thereof, has been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. The housing trajectory has been updated and refined post publication of the Deposit Plan to take the latest delivery information into account. A subsequent Stakeholder Group Meeting was held in May 2022 and there was unanimous agreement regarding the timing and phasing of sites within the trajectory.
Proposal to reduce Outdoor Sport and Recreation Facilities Requirements within COM10 on the basis that 3.35 hectares of open space per 1,000 population is required, whereas Fields in Trust only require 2.4 hectares of open space per 1,000 population.	Not supported - COM10 is based on Fields in Trust recommended benchmark guidelines and allotment standards endorsed by the National Society of Allotment and Leisure Gardeners. The standards detailed within COM10 are not intended to represent minimum provision on all developments and the nature of contribution will be assessed based on the site-specific context. As stated within COM10 itself, “provision of a satisfactory standard of outdoor recreation space is required on all new housing developments” and “the nature and type of provision will be informed by the findings of the latest Outdoor Sport and Children’s Playspace Audit and Allotment Audit”. On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG.
Proposal to remove reference to Place Plans within Policy SP6.	Not supported - the reference to Place Plans within SP6 is in relation to the delivery of sites within defined settlement boundaries in accordance with all other policies in the Plan. As stated in SP6 itself, “there will be a presumption against housing development in all areas outside defined settlement boundaries, unless the proposal is considered an appropriate exceptional case as detailed in Development Management Policy COM5”. The policy wording is considered appropriate in its current form.
Concern regarding the large and small windfall allowance.	No action considered necessary - an Urban Capacity Study was published alongside the Deposit Plan to provide further analysis of the potential urban capacity of the County Borough’s settlements for housing to evidence the expected small and windfall site allowance rate. This Study was updated in 2022 and identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this component of housing supply. It therefore demonstrates (in addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
<p>Objections to the 10 unit 'cap' within the Affordable Housing Exception Sites Policy (COM5) and requests to remove any dwelling limit.</p>	<p>Not supported - the Plan seeks to prioritise delivery of affordable housing within the designated settlement boundaries in accordance with placemaking principles. However, it is recognised that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner. The Replacement LDP therefore includes an affordable housing exception policy, which is an exception to the general housing provision policies that do not otherwise permit new housing within or outside settlement boundaries. Development will need to respond to a pressing need identified by the LHMA and/or Local Housing Authority and comprise of no more than 10 affordable units. This is considered to be the appropriate maximum size for a sustainable cluster of affordable housing as required on larger housing developments and is therefore equally applicable to an exception site. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities.</p>
<p>Recommendation to alter the wording of COM5 to enable the release of affordable housing exception sites "within or adjoining" existing settlements and to include the definition of 'local need' within the Plan in accordance with national policy.</p>	<p>Supported – COM5 will be amended to include "within or adjoining" and the definition of 'local need' will be included in the reasoned justification.</p>
<p>Recommendation to formally agree the GTAA with the relevant MS and demonstrate the related allocations can be delivered in the identified timescales.</p>	<p>Supported – the Council submitted the GTAA to Welsh Government in December 2020, remains committed to progressing the GTAA to approval and ensuring any identified unmet need can be delivered through the Replacement LDP.</p>
<p>Concerns regarding loss of public open space.</p>	<p>No action considered necessary - as part of the technical supporting evidence base, the Council has undertaken an updated Outdoor Sport and Children's Play Space Audit (2021). Its findings can be used as a means of justifying the provision of new facilities and/or remedying local deficiencies in provision. It can also be used as a means of safeguarding and enhancing existing facilities as appropriate. Policy COM10 also set out that "provision of a satisfactory standard of outdoor recreation space is required on all new housing developments" and "the nature and type of provision will be informed by the findings of the latest Outdoor Sport and Children's Playspace Audit and Allotment Audit". On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG. Policies PLA1-5 also require strategic development sites to be in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance</p>
<p>Concerns regarding the affordability of homes and whether affordable housing will be truly affordable for local people.</p>	<p>No action considered necessary – Affordable housing contributions will be sought on residential developments as set out by COM3. New housing developments must incorporate an appropriate mix of house types, sizes and tenures to cater for the range of locally identified housing needs. The Council has prepared an updated LHMA for the County Borough. This assessment has informed the Replacement LDP to ensure the plan will provide an appropriate contribution to affordable housing provision, through viable thresholds and proportions. All affordable housing provision delivered via the Replacement LDP will comply with the definition outlined in Technical Advice Note 2 and be secured through an appropriate s106 agreement to ensure the resultant products are usefully affordable.</p>
<p>Concerns regarding the lack of infrastructure to support proposed developments (i.e. schools, roads and utilities).</p>	<p>No action considered necessary - infrastructure providers have been engaged at key stages of Plan preparation and an Infrastructure Delivery Plan (IDP) has been produced, which provides a single schedule of all infrastructure necessary to render development acceptable in planning terms. All allocations will need to deliver appropriate supporting infrastructure, as referenced within the IDP, to enable the quantum of proposed development within the plan period to proceed. Without exception, all proposed residential allocations are supported by a large body of technical and viability evidence to demonstrate their deliverability and show that they can fund necessary supporting infrastructure.</p>
<p>Concerns regarding the impact of development on primary healthcare facilities.</p>	<p>No action necessary - 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</p>

Table 1 – Summary of Responses

Core Issues Raised	Council Response
	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 Replacement LDP progress.
Concerns regarding increase in traffic.	No action considered necessary - 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. 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 STA 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. Policies PLA1-PLA5 detail the site-specific requirements including masterplan development principles and development requirements of which include pursuing transit-orientated development that prioritises walking, cycling and public transport use, whilst reducing private motor vehicle dependency.
Employment Strategy	
General support for the employment strategy.	Comments noted.
Proposal to de-allocate Ty Draw Farm, North Cornelly ENT1(11) as an employment site and either re-allocate it as a residential site or as 'white land' within the settlement boundary.	Not supported – this employment allocation is to be maintained as per the findings of the Economic Evidence Base Study (2019), Economic Evidence Base Update (2021) and as set out in the Employment Background Paper. The employment site has not yet been readied for the market and the owner has not yet fulfilled the original commitment to undertake the enabling works as required by the Section 106 Agreement. The final selection of proposed sites for housing are documented within the Candidate Site Assessment and these sites are supported by a detailed body of evidence to demonstrate their deliverability.
Proposal to expand the allocation of Brackla Industrial Estate from B1, B2 and B8 uses to refer to education and retail uses.	Not supported – Brackla Industrial Estate was identified in the Economic Evidence Base Study as a site that would contribute to future employment land supply, hence the site is allocated within ENT1 for new employment land development of B1, B2 and B8 use classes. Any alternative proposal would need to clearly justify the loss of employment land in accordance with the LDP policy framework.
Concerns regarding the lack of employment opportunities within Porthcawl.	No action considered necessary – Porthcawl is recognised as having an important role in the settlement hierarchy of the County Borough, given that it is a principal centre of services, jobs and community facilities (refer to the Settlement Assessment). The Plan acknowledges that there is an imbalance between housing and employment provision within Porthcawl (owing to the lack of 'B space' employment land), although the Replacement LDP seeks to reinforce employment in the town through planned growth in the commercial, leisure and tourism sectors. This will help boost the local economy of this existing main settlement by increasing the pool of local labour and rendering the centre more attractive for development by closely linking new residential development to employment, recreation and education uses through active travel principles. This is designed to combat potential decline in the town, which may otherwise occur without a lack of economic growth over the plan period.
Concerns that the scale of residential development proposed will generate excessive out-commuting	No action considered necessary - as detailed within the Employment Background Paper, the Replacement LDP evidence base has evaluated a comprehensive range of growth options and analysed the link between different levels of population change and the size and profile of the resultant resident labour force. This has ensured development of a Growth Strategy that is most appropriate to achieve an equilibrium between the number of economically active people remaining within and moving into the County Borough plus the number of employers relocating and/or expanding within the

Table 1 – Summary of Responses

Core Issues Raised	Council Response
from Bridgend to Cardiff and Swansea for employment purposes.	same vicinity. A key aim of the Plan is to minimise the need for out-commuting. The relationship between housing growth and employment provision has been very carefully considered to this end. Therefore, the Replacement LDP does not seek to transform Bridgend County Borough into a commuter area for Cardiff and Swansea, and this is the opposite of what the strategy is seeking to achieve. The level of growth proposed is considered the most appropriate to achieve an equilibrium between new homes and employment provision, balanced against other key infrastructure requirements, and connected through enhanced active travel opportunities. This is detailed further within the Employment Background Paper.
Concerns over empty business premises and whether employers would be attracted to Bridgend over the Plan period.	No action necessary - over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace-based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs. A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study and 2021 Update analysed this projected labour force boost alongside other employment trends, including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11. Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different employment sites to come forward.
Retail Centres and Development Policies	
Concerns regarding empty units within retail and commercial centres.	No action necessary - Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve. The Retail Study (2019) sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. The 2019 Retail Study already identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. Additionally, a sense check of the evidence base has been undertaken in light of the pandemic (refer to the Covid-19 Policy Review Background Paper). The Replacement LDP recognises that the role and function of high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space. The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.
Concerns regarding how the Replacement LDP will maintain the vibrancy and vitality of Bridgend Town Centre.	No action considered necessary - Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve. The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity. With regards to Bridgend Town Centre, the Council consulted on a Bridgend Town Centre Masterplan in 2020-21. The masterplan is regeneration focussed and outlines a vision for a liveable and vibrant community. It identifies a series of ambitious and deliverable projects for the next ten years that will support future economic growth and secure more benefits and opportunities for Bridgend.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Concerns regarding the proposed food store as part of Porthcawl Waterfront (SP2(1)).	No action necessary – the Retail Study (2019) concluded that whilst there is limited quantitative need for additional convenience floorspace throughout the County Borough, there is a qualitative need within Porthcawl. In addition, Stantec were commissioned by the Council to undertake a sequential site test in May 2019. This concluded that the Hillsboro Place Car Park site was the most preferable location, whilst documenting the various reasons why this site has not come forward despite its allocation in the existing LDP. The Sequential Site Test identified the Salt Lake site as the next most preferable site, being located 50m from the commercial centre boundary. Marketing for a new foodstore was carried out in autumn 2020 and five bids were received and appraised. Each bid was carefully assessed against a planning development brief and Aldi Stores Ltd was identified as the preferred bidder. Cabinet Members approved the disposal of the site to Aldi Stores Ltd, and provided delegated authority to officers to approve the terms of the disposal agreement. The food store site forms a key element of the wider masterplan that has been worked up for the Porthcawl Waterfront Regeneration Scheme and is intended to act as a precursor to, and catalyst for, future phases of development across the wider site. Planning consent has since been issued for this development (Ref:P/21/835/FUL).
Proposal for empty offices and shops in town centres to be converted into housing to help meet the housing requirement.	No action necessary - The evidence contained within the Urban Capacity Study identifies the level of capacity across the County Borough’s settlements in both numeric and spatial terms, to evidence the expected small and windfall site allowance rate. Many of the sites and sources of urban capacity identified in the Study are located in town and commercial centres, including empty homes; previously developed, vacant and/or derelict land and buildings (non-housing); conversion of commercial buildings; redevelopment of car parks and vacant space above commercial premises. Together with the greater flexibility introduced into the Retail and Town Centre policies of the Replacement LDP, the UCS demonstrates scope to accommodate more residential development within these areas. The derived small and windfall site allowance already forms a component of housing supply to contribute to the housing requirement.
Support for Town Centre first approach and opposition to out-of-centre retail development.	Comments noted.
Concerns that Town and Commercial Centres need a greater range of uses (Policy ENT6).	No action necessary - The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.
Concerns that Town Centres need more car parking.	Not supported - the availability of car parking has a major influence on how people choose to travel, therefore, the Council will seek to restrict developments that generate a high level of trips (e.g. offices, shops and leisure uses) to locations well served by public transport. A carefully considered approach is required to ensure that appropriate parking is provided to serve developments, whilst recognising that parking availability and charges are key tools in facilitating a reduction in private car use. The Replacement LDP aims to encourage a change in modal choice towards more sustainable means of travel.
Policies ENT7 (Development in Commercial Centres) and ENT8 (Non A1, A2 and A3 Uses Outside of Primary Shopping Areas) need greater clarity as to which criteria apply to development proposals in primary and secondary shopping areas.	Supported – Policies ENT7 and ENT8 will be revised to clarify which criteria apply to development proposals in primary and secondary shopping areas and which apply to development proposals outside of primary and secondary shopping areas but within Retail and Commercial Centres.
Renewable Energy, Mineral Resources and Waste Management Policies	
General support for the policies.	No action necessary.
Proposal to set a higher dwelling threshold for an energy masterplan within ENT10 (Low Carbon Heating Technologies for New Development) and	Not supported - the requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, “In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that

Table 1 – Summary of Responses

Core Issues Raised	Council Response
ENT11 (Energy Efficiency Provision Within the Design of Buildings).	could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission". In addition, Energy Masterplans for major developments and exploring heat networks directly align with Policy 16 (Future Wales). The proposal to increase the threshold beyond 10 units is therefore not considered justified.
Proposed change to SP14 to include a criterion to ensure that any minerals extraction takes account of the location of water and sewerage assets.	Supported – Policy SP14 will be revised accordingly.
Recommendation to include a Statement of Sub-Regional Collaboration (SSRC) on the LPA's contribution to the future provision of aggregate production.	Supported - the Council will seek to resolve this issue before the plan is submitted for examination.
Recommendation to amend Policy ENT14 to identify the location of the mineral operations and their buffer zones.	Supported - A corresponding list will be added within Policy ENT14.
Concerns regarding the financial constraints of renewable energy measures on development.	No action considered necessary - The Council has an aspiration for all new homes to be net zero carbon. Future Wales identifies Bridgend as a 'Priority Area for District Heat Networks' and requires planning authorities to identify opportunities for District Heat Networks and plan positively for their implementation. The Bridgend Local Area Energy Strategy and Renewable Energy Assessment identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions. As such, Policy ENT10 will ensure that new major development is accompanied by an 'Energy Masterplan that demonstrates that the most sustainable heating and cooling systems have been selected. This must include consideration of the proposed system as a whole, including the impact of its component materials on greenhouse gas emissions. They must also demonstrate that heating systems have been selected in accordance with the sequential approach set out by Policy ENT2. Any proposed development will be required to demonstrate how the proposal will facilitate a connection to a low carbon heat network, or robustly justify why the connection is not technically and/or economically viable and suggest an alternative approach.
Concerns that new housing will increase waste and whether there is adequate provision of waste management facilities.	No action considered necessary - Policy ENT16: Waste Movement in New Development will ensure that all proposals include provision for the proper design, location, storage and management of waste generated by the development. Development must also incorporate, as appropriate, adequate and effective provision for the storage, recycling and other sustainable management of waste, and allow appropriate access arrangements for recycling and refuse collection vehicles and personnel. The views of the Council's Waste Management Section will be considered on all types of development to ascertain the extent and nature of facilities needed to deal with any potential municipal waste arising associated with development.
Natural and Built Environment Policies	
Proposal to set a higher dwelling threshold for a green infrastructure assessment within DNP8 (Green Infrastructure).	Not supported - Policy DNP8 seeks to ensure that Bridgend's green infrastructure assets are valued, protected, enhanced and managed through a green infrastructure network. DNP8 clearly states that all major developments will be required to submit a Green Infrastructure Assessment. Major developments are developments of 10 residential units or more. Such schemes will need to be designed to consider the existing green infrastructure assets to ensure no fragmentation or loss of connectivity whilst maximising ecosystem resilience and ecosystem services.
Recommendation to refine references to biodiversity net gain in policies SP17 and DNP6 to be based on a net benefit approach.	Supported – both policies will be refined to reflect a net benefit approach.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Concerns regarding the absence of a green wedge policy.	No action considered necessary – a Green Wedge Review (2021) was undertaken, which evaluated the green wedge designations in the existing LDP and considered whether they needed to be retained in the Replacement LDP. The Review concluded that, whilst the existing LDP Policy (ENV2: Development in Green Wedges) has been successful in preventing coalescence, other policies contained within the extant LDP have also been successful (particularly Policy ENV1: Development in the Countryside). Furthermore, the Replacement LDP features defined settlement boundaries and policies that strictly control development impacting upon the countryside, open space, biodiversity, landscape and the environment, whilst also allocating sufficient land for housing. As such, it is considered that the green wedge policy need not be taken forward in the Replacement LDP.
Proposals to protect the natural environment as much as possible	Supported, although no action necessary - the Strategy already acknowledges that the County Borough has a rich and varied biodiversity with a broad range of species, habitats and unique, rich landscapes. Policies within the Deposit Plan have been refreshed and updated from the existing LDP and will continue to protect the county borough’s environment in line with national planning policy and the Environment Act 2016. These policies cover development in the countryside, special landscape areas, local / regional nature conservation sites, trees, hedgerows and development, green infrastructure, nature conservation, natural resources protection and public health. For development to be sustainable, it needs to be soundly based on good environmental assessments, and to be well planned and controlled with regard to its environmental impact, in order to conserve and enhance biodiversity.
Proposals for greater protection for green spaces and provision of allotment space relative to demand.	Supported, although no action necessary - development proposals including strategic site allocations will be expected to maintain, protect and enhance Bridgend’s green infrastructure network and ensure that individual green assets are retained wherever possible and integrated into any new development. Policy COM10 sets a benchmark standard of 0.2 hectares of allotment space per 1,000 population. Promoters of residential development proposals will need to demonstrate compliance with Policy COM10 through the submission of a green infrastructure strategy which will facilitate the provision of additional allotment plots in appropriate locations where there is evidence of need.
Proposal to change wording of Policy DNP6 to promote recreation linkages and active travel.	No action necessary - the supporting text to Policy DNP6 promotes a range of opportunities identified within the BCBC Local Biodiversity Action Plan that development proposals must seek to implement to achieve biodiversity net gain or ecological enhancement.
General support for planting and protecting native trees, wildflowers and hedgerows.	No action necessary - the Replacement LDP recognises that the planting of native species of flowers and trees is a means to increase the pollination resource, promote wildlife diversity, increase vegetation carbon storage and to cool and purify the air.
Concern that the preservation of historic environment should be given greater priority.	No action necessary - the LDP recognises the importance of the Historic Environment and its’s fundamental role in distinctive and natural placemaking through the planning system. The historic environment will be protected, conserved and, where appropriate, promoted and enhanced. The impact of any development proposal on the significance and heritage values of individual historic assets will need to be fully considered by applicants through the preparation of a heritage impact assessment as part of the planning process.
Key Proposals for Maesteg and the Llynfi Valley	
General support for re-allocating existing sites within Maesteg and the Llynfi Valley as Long-Term Regenerations sites.	No action necessary.
Proposal to de-allocate Long-Term Regeneration sites within Maesteg and the Llynfi Valley as there are too many units allocated in this area.	Not supported - the three respective regeneration sites proposed within this vicinity are brownfield regeneration allocations within the existing LDP that the Council intends to ‘rollover’ and re-allocate as Long-Term Regeneration Sites. The retention of such sites represents a necessary degree of continuity with the first adopted LDP, which is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. However, for the avoidance of doubt, and in accordance with national policy, these Long-Term Regeneration Sites are not included as a component of housing supply. They are considered ‘bonus sites’.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Capacity concerns regarding the A4063, further development in the Llynfi Valley and the impacts on the Valleys Gateway.	No action necessary - Policy PLA8(10) acknowledges that there are significant constraints along the A4063 between Sarn and Maesteg which generate capacity and safety concerns. Appropriate improvements to address these concerns will continue to be pursued and secured through the use of Highway and Planning Agreements where they relate to the impact of new development. An STA 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 STA demonstrates that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation. Moreover, as a Main Settlement, and one of the largest towns in the County Borough, Maesteg demonstrates a high degree of self-containment, with plentiful services, facilities, active travel linkages and rail connections.
Support for the three allocations at Pont Rhyd-y-Cyff, Maesteg Sustainable Growth Area (COM1(3, 4 and 5)).	Comments noted.
Concerns regarding impact of development on the Valleys Gateway and the capacity of Junction 36 of the M4	No action necessary - The capacity constraints of Junction 36 of the M4 are fully explored in Background Paper 8, which concludes that there is no prospect of major development being situated near Junction 36 in the Replacement LDP period without the identification of a major transport intervention to alleviate the existing problems. As such, the Valleys Gateway is not identified as a growth area. Whilst, in isolation, planned investment in the Cardiff Capital Region Metro will not alleviate the congestion at Junction 36, the introduction of larger roller stock and the increase in services on the Maesteg Line will have a positive effect on encouraging modal shift away from the private car. This will be combined with the provision of further active travel improvements.
Suggestion for the Proposals Map to show: <ul style="list-style-type: none"> • Spirit of Llynfi Woodland site • Disused railway line from Maesteg to Caerau • NCN route 885 	No action necessary – Policy COM11(9) is shown on the proposals map and incorporates the provision of natural and semi-natural greenspace as part of the Former Maesteg Washery area. Policy PLA10 protects disused rail lines from development that would prevent them from being brought back into use for rail or active travel use. It is not considered necessary to indicate all such corridors on the proposals map. All existing and proposed cycle routes are shown on the Council’s Active Travel Network Map.
Concern that affordable housing targets are too low in the Llynfi Valley.	No action necessary - the Plan’s contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. Refer to the Plan-Wide Viability Assessment and Affordable Housing Background Paper.
Key Proposals for Porthcawl and Pyle, North Cornelly and Kenfig Hill	
Support regeneration proposals at Porthcawl Waterfront (SP2(1)).	Comments noted.
Concerns raised regarding the deliverability of Porthcawl Waterfront (SP2(1)). Proposals to de-allocate the site on this basis or alter the designation to a Long-Term Regeneration Site.	Not supported - before being ‘rolled forward’ into the Deposit Plan, Porthcawl Waterfront was subject to robust re-assessment of its sustainability, deliverability and viability credentials in the same manner as all other candidate sites. There has been a substantial change in circumstances to demonstrate the site can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to Housing Trajectory Background Paper and Candidate Site Assessment).
Objections to the re-allocation of Porthcawl Waterfront (SP2(1)) due to potential negative impacts on wellbeing, infrastructure, the street scene, the seascape/landscape, the environment, flooding,	Not supported - 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 Policy PLA1). 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,

Table 1 – Summary of Responses

Core Issues Raised	Council Response
traffic, parking provision, tourism provision, leisure provision and job creation.	retail and community facility provision. The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components of the Plan, with appropriate mitigation measures incorporated.
Concerns regarding second home ownership at Porthcawl Waterfront SP2(1)).	No action considered necessary – main residences and second homes currently fall into the same use class (c3) and planning permission is not required to move within class C3. Whether the use of a dwelling for commercial letting as holiday accommodation amounts to a material change of use will be a question of fact and degree in each case, and the action will depend upon the particular characteristics of the use as holiday accommodation. Alternative mechanisms such as licensing and tax premiums on second homes are beyond the scope of the land use planning system.
Support Land East of Pyle (SP2(5)), with proposed policy modifications to PLA5 (masterplan development principles).	No action considered necessary – the Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.
Proposal to de-allocate Land East of Pyle (SP2(5)) from the Replacement LDP due to deliverability concerns.	Not supported - a detailed plethora of evidence has been provided to the Council to support the site's delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full extent of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.
Proposal to de-allocate Land East of Pyle (SP2(5)) from the Replacement LDP due to the scale of the site and consider allocation within the forthcoming SDP instead.	Not supported – a detailed plethora of evidence has been provided to the Council to demonstrate that Land East of Pyle is both viable and deliverable during the Replacement LDP period, in accordance with the Growth and Spatial Strategy. Work on the SDP has not yet commenced, and site thresholds have not yet been defined through this process. The Bridgend Replacement LDP is being prepared in advance of the forthcoming SDP and is bound by a Delivery Agreement. Bridgend County Borough Council has remained in dialogue with Neath Port Talbot County Borough Council through plan preparation. Neath Port Talbot County Borough Council has submitted formal representations on the Bridgend Deposit Plan, cite no objections to this proposed allocation and support the Replacement LDP.
Concern that affordable housing is low for Land East of Pyle (SP2(5)).	No action necessary – in addition to the Plan-Wide Viability Assessment, site-specific appraisals have been prepared for those sites key to delivering the Replacement LDP. The Council has maintained continuous dialogue with the site promoter to demonstrate Land East of Pyle can be delivered through analysis of specific costs, constraints and site requirements. The provision of 15% affordable housing is considered to be the appropriate, viable level of provision for Land East of Pyle, as reflected in PLA5 and COM3.
Key Proposals for the Ogmore and Garw Valleys	
Concerns regarding investment in the Ogmore and Garw Valleys.	No action considered necessary – the Ogmore and Garw Valleys are identified as Local Settlements. Whilst these areas have not been earmarked to accommodate significant growth, the Replacement LDP recognises that alternative forms of development would help deliver smaller-scale growth, such as (but not limited to) co-operative housing, self-build and custom build opportunities alongside other forms of development. Such community investment opportunities will enable development of a scale and nature that is tailored to community needs, whilst diversifying and strengthening the local economies, connecting communities to wider opportunities and protecting the high-quality environments.
General support for co-operative housing and improvements to walking and cycling facilities.	No action necessary.
Concern in relation to traffic generated by the proposed development in Llynfi Valley and HGV traffic from WEPA.	No action necessary - Policy PLA8(10) acknowledges that there are significant constraints along the A4063 between Sarn and Maesteg which generate capacity and safety concerns. Appropriate improvements to address these concerns will continue to be pursued and secured through the use of Highway and Planning Agreements where they relate to the impact of new development. An STA 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

Table 1 – Summary of Responses

Core Issues Raised	Council Response
	STA demonstrates that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation.
Concern in relation to public transport in Ogmores and Garw Valley.	No action necessary - the Settlement Assessment acknowledges that the Ogmores and Garw Valleys are less accessible due to having no railway line and less frequent bus services than other parts of the County Borough. These factors informed the settlement hierarchy and spatial strategy and hence these areas have not been earmarked to accommodate significant growth. Nevertheless, the Replacement LDP seeks to enhance existing road connections by promoting walking and cycling links, public transport and improvements to the local highway network.
Key Proposals for Bridgend and Pen-coed	
Concerns raised as to whether Land East of Pen-coed (SP2(4)) is deliverable in whole or in part.	Not supported - a detailed plethora of evidence has been provided to the Council to support the site's delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities (refer to the Candidate Site Assessment).
Concerns over Land East of Pen-coed (SP2(4)) due to education provision.	No action considered necessary – as part of the proposed allocation, Policy PLA4 requires the provision of a new primary school on-site along with 20% affordable housing, on and off-site highway improvements to provide good quality pedestrian and cycle linkages to nearby facilities and a multi-functional green infrastructure network throughout the site. A decision on language type for the primary provision (i.e., whether the school is Welsh or English-medium) will be undertaken in due course.
Support Land East of Pen-coed (SP2(4)) as a means of delivering the Growth Strategy.	No action considered necessary - all allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual.
Concerns as to whether Land South of Bridgend (Island Farm, SP2(2)) is deliverable in whole or in part.	Not supported - a detailed plethora of evidence has been provided to the Council to support the site's delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities (refer to the Candidate Site Assessment).
Oppose the allocation of Land South of Bridgend (Island Farm, SP2(2)) due potential pressure on infrastructure, air quality concerns, highway safety concerns, loss of landscape and visual amenity and potential detriment to history, archaeology, woodland and biodiversity.	Not supported – as part of the proposed allocation, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (see PLA2). The provision of new residential units, including affordable dwellings, will be incorporated alongside a new primary school with co-located nursery, the re-location of Heronsbridge Special School, leisure facilities, recreation facilities, public open space, plus appropriate community facilities, employment and commercial uses. The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components of the Plan, with appropriate mitigation measures incorporated.
Support Land South of Bridgend (Island Farm, SP2(2)) as a means of delivering the Growth Strategy.	No action considered necessary - all allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Concerns as to whether Land West of Bridgend (SP2(3)) is deliverable in whole or in part.	Not supported - a detailed plethora of evidence has been provided to the Council to support the site's delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities (refer to the Candidate Site Assessment).
Oppose the allocation of Land West of Bridgend (SP2(3)) due to potential coalescence of communities, pressure on infrastructure, air quality concerns, highway safety concerns, loss of landscape and visual amenity and detriment to history, archaeology, woodland and biodiversity.	Not supported - 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 PLA3). The provision of new residential dwellings, including affordable units, will be incorporated alongside a new primary school, recreation facilities, public open space, plus appropriate community facilities all set within distinct character areas. The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components of the Plan, with appropriate mitigation measures incorporated.
Support Land West of Bridgend (SP2(3)) as a means of delivering the Growth Strategy.	No action considered necessary - all allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual.
Concerns over the deliverability of Parc Afon Ewenni (COM1(1)).	Plan amended - all existing allocations were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. Flood risk issues have now necessitated removal of Parc Afon Ewenni, Bridgend from the Housing Trajectory and the site can no longer be relied on to contribute to the housing requirement.
Support Parc Afon Ewenni (COM1(1)) as a means of delivering the Growth Strategy.	Plan amended - all existing allocations were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. Flood risk issues have now necessitated removal of Parc Afon Ewenni, Bridgend from the Housing Trajectory and the site can no longer be relied on to contribute to the housing requirement.
Proposals for Merthyr Mawr to be protected.	<p>No action considered necessary - The land surrounding Merthyr Mawr is protected by various designations and policies (see Appendix 25 – Special Landscape Designations and Appendix 26 – Landscape Character Assessment). Policy SP17 specifically seeks to protect statutorily designated sites of national importance and any development proposal which affects such sites will be subject to special scrutiny to establish any potential or indirect effects. The onus will be firmly placed on any potential developer and/or owner to clearly demonstrate the case for the site's development, and why development should not be located elsewhere on a site of less significance to nature conservation.</p> <p>Merthyr Mawr Warren is also designated as a Special Landscape Area (SLA), protected by Policy DNP4. In order to be acceptable, development within a SLA should retain and enhance the positive attributes of its landscape and seek to remove or mitigate any negative influences.</p> <p>Merthyr Mawr Village is also designated as a Conservation Area in recognition of the area's special architectural or historic interest. In considering development proposals, the Council will seek to resist new development or the demolition of existing buildings unless it would preserve or enhance the character and appearance of the conservation area (see Policy DNP11).</p>
Other Comments	
The LDP is considered to be in general conformity with Future Wales	Comments noted.
Consultation period too short / insufficient.	No action considered necessary – consultation undertaken in accordance with Replacement Delivery Agreement and statutory legislation.

Table 1 – Summary of Responses

Core Issues Raised	Council Response
Recommendation to take account of the revised TAN15 and its implications on proposed policies and allocations before the Deposit Plan is submitted for examination.	Supported – a review will be undertaken prior to submission of the Replacement LDP.
Recommendation to continue to engage with NRW and work towards a Statement of Common Ground making clear NRW's view on any sites affected and mitigation measures proposed.	Supported – the Council will continue to work with NRW prior to submission of the Replacement LDP.
Recommendation to include site-specific viability testing information within the evidence base when the plan is submitted for examination.	Supported - appropriately anonymised site-specific viability testing information will be released within the evidence base when the plan is submitted for examination.
Recommendation to 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.	Supported - 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.
Recommendation to enhance Background Paper 17: NDF Conformity Assessment to make clear how the policies in the LDP conform to the 11 outcomes and policies in the NDF.	Supported – Background Paper 17 will be refined accordingly.
Concerns regarding the readability of the document.	No action considered necessary - The Plan has to be prepared in the context of national legislation and guidance and has to be informed by an appropriate evidence base comprising background papers and other technical documents. The consultation included a summary document and all consultation materials were made available to view in libraries across the County Borough in addition to the Civic Offices via appointment. Guides on how to comment and register were available online. Additionally, dedicated phone lines were made available during weekdays. The Local Development Plan has to be written in a particular style to meet national guidance.

Appendix 1: Screenshots of Deposit Consultation Methods

Consultation Portal, Bridgend County Borough Council Website

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Bridgend County Borough Council

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> [Replacement Local Development Plan Consultation](#)

Replacement Local Development Plan Consultation

We're looking for your views on our Replacement Local Development Plan (LDP). This is a masterplan which will be used to determine what kinds of development can take place throughout the area between now and 2033.

The LDP, which is currently at the draft deposit stage, features all of the policies that the authority will use when determining future planning applications.

It sets out how land can be used, and which parts of the county borough will be maintained as open space or designated for residential, employment, retail, waste, mineral development, community and tourism purposes.

Read the Replacement Local Development Plan Consultation documents for more information:

- [Consultation Document](#)
- [Summary Consultation Document](#)
- [Proposals Map](#)
- [View background documents](#)

How to respond

The consultation starts on Tuesday 1 June and ends on Tuesday 27 July. You can respond or ask further questions in the following ways:

[Complete the online survey](#)

Alternative formats are also available upon request.

In addition, members of the Strategic Planning Team will be available to answer queries by phone. This will be done on an appointment basis, and bookings can be made by emailing ldp@bridgend.gov.uk or phoning 01656 643633.

Contact

Communications, Marketing and Engagement

Email: consultation@bridgend.gov.uk

Telephone: 01656 643664

Address: Bridgend County Borough Council, Civic Offices, Angel Street, CF31 4WB.

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Legal Notices

BRIDGEND COUNTY BOROUGH COUNCIL
Planning and Compulsory Purchase Act 2004
The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004
The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (Regulation 17)
Conservation of Habitats and Species Regulations 2017 (as amended)
Notice of Deposit of Proposals for a Replacement Local Development Plan (2018 - 2033)

Bridgend County Borough Council has prepared deposit proposals for the above plan. The Replacement Local Development Plan (LDP) will, upon adoption, replace the current development plan and be the basis for decisions on land use planning for Bridgend County Borough.

The deposit proposals documents include the 'deposit' LDP, the Sustainability Appraisal (which incorporates the Strategic Environmental Assessment), the Habitats Regulations Assessment, an initial Consultation Report together with other supporting documents.

The Deposit LDP and background documents are available to view on the Council's website from 1st June 2021 to 27th July 2021. Copies are also available for inspection during normal opening hours at all public libraries in the County Borough, details of which can either be obtained from the Council's website, or by contacting the relevant library and at the Civic Offices, Angel Street, Bridgend.

Any visit to the Civic Centre must be made by prior arrangement.

The closing date for the submission of comments on the Replacement LDP Deposit Proposals is 5pm on 27th July 2021. Please submit any comments by completing the online survey as follows:

- Visit: www.bridgend.gov.uk/LDPconsultation
- Email a copy of the survey to: consultation@bridgend.gov.uk
- Post a copy of the survey to: Civic Offices, Angel Street, Bridgend, CF31 4WB

Representations (including those taking the form of objections) should specify the particular part of the plan to which they relate by paragraph, policy number, or location of a new or amended site. Respondents should indicate the proposed new strategy and the integrated Sustainability Appraisal. This will be essential where the representation seeks the inclusion of a new or amended site or the incorporation of a site rejected by the Authority. All representations made about the Plan will be available for the public to view.

The deposit LDP will be considered by an independent inspector who will assess whether it is 'sound'. There are a number of tests of soundness and objections to the deposit LDP should make reference to these tests wherever possible. Representations may also be accompanied by a request to be notified at a specified address of the next stage of the LDP and/or that the LDP has been submitted to the Welsh Government for independent examination and/or the adoption of the plan.

The Local Planning Authority cannot change the plan at this stage but it can decide whether it is in favour of any changes proposed. Representations made in accordance with this notice (i.e. 'duly made') will be considered by an independent Inspector appointed to examine the soundness of the plan.

Only those making representations seeking to change the deposit LDP whose representations were 'duly made' have the right to appear before and be heard by the Inspector at the Examination. Further information on the LDP process and relevant background documents are available on the Council's web site at <https://www.bridgend.gov.uk/residents/planning-and-building-control/development-planning/> or telephone the Strategic Planning Team on 01656 64333 for further information.

Richard Matthams
 Strategic Planning Manager

CYNGOR BWRDEISTREF SIROL PEN-Y-BONT AR OGWR
Deddf Cynllunio a Phrynu Gorfolod 2004

Rheoliadau Aseidiadau Amgylcheddol o Gynlluniau a Rhaglenni (Cymru) 2004
Rheoliadau Cynllunio Gwlad a Thref (Cynlluniau Datblygu Lleol) (Cymru) 2005 (Rheoliad 17)
Rheoliadau Cadwraeth Cynefinoedd a Rhywogaethau 2017 (fel y'u diwygiwyd)
Hysbysiad Adneuo Cynigion ar gyfer Cynllun Datblygu Lleol Newydd (2018 - 2033)

Mae Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr wedi paratol cynigion adneuo ar gyfer y cynllun uchod. Bydd y Cynllun Datblygu Lleol Newydd (CDLI), ar ôl ei fabwysiadu, yn disodli'r cynllun datblygu presennol ac yn sail i benderfyniadau ar gynllunio defnydd tir ar gyfer Bwrdeistref Sirol Pen-y-bont ar Ogwr.

Mae'r dogfennau cynigion adneuo yn cynnwys y CDLI 'adnau', yr Arfarniad Cynaliadwyedd (sy'n ymgorffori'r Aseidiad Amgylcheddol Strategol), yr Aseidiad Rheoliadau Cynefinoedd, Adroddiad Ymgynghori cychwynnol ynghyd â dogfennau ategol eraill.

Mae'r CDLI Adnau a'r dogfennau cefndir ar gael i'w gweld ar wefan y Cyngor rhwng 1 Mehefin 2021 a 27 Gorffennaf 2021. Mae copiau hefyd ar gael i'w harchwilio yn ystod oriau agor arferol ym mhob llyfrgell gyhoeddus yn y Fwrdeistref Sirol, ac fe geir y manylion nall ai ar wefan y Cyngor, neu drwy gysylltu â'r llyfrgell berthnasol ac yn y Swyddfeydd Dinesig, Stryd yr Angel, Pen-y-bont ar Ogwr. Rhaid i unrhyw ymweliad â'r Ganoifan Ddinesig gael ei wneud drwy drefniant ymlaen llaw.

Y dyddiad cau ar gyfer cyflwyno sylwadau ar Gynigion Adneuo'r CDLI Newydd yw 5pm ar 27 Gorffennaf 2021. Cyflwynwch unrhyw sylwadau drwy gwblhau'r arolwg ar-lein fel a ganlyn:

- Ymweliad: www.bridgend.gov.uk/ymgynghoriadCDLI
- E-bostiwch gopi o'r arolwg at: consultation@bridgend.gov.uk
- Postiwch gopi o'r arolwg at: Swyddfeydd Dinesig, Stryd yr Angel, Pen-y-bont ar Ogwr, CF31 4WB

Dylai sylwadau (gan gynnwys y rhai sydd ar ffurf gwrthwynebiadau) nodi'r rhan benodol o'r cynllun y maen nhw'n ymwneud ag ef yn ôl paragraff, rhif polisi, neu fap cynigion. Yn achos hepgoriad canfyddedig, dylai ymatebwyr nodi'r polisi newydd arfaethedig, testun ategol, neu leoliad safle newydd neu ddiwygiedig. Dylai ymatebwyr nodi sut mae eu gosodiad yn cyd-fynd â'r strategaeth gyffredinol a'r Arfarniad Cynaliadwyedd integredig. Bydd hyn yn hanfodol pan fydd y sylwadau yn ceisio cynnwys safle newydd neu ddiwygiedig neu ymgorffori safle a wrthodwyd gan yr Awdurdod. Bydd yr holl sylwadau a wneir am y Cynllun ar gael i'r cyhoedd eu gweld.

Bydd y CDLI adneuo yn cael ei ystyried gan Arolygydd annibynnol a fydd yn asesu a yw'n 'gadarn'. Ceir nifer o brofion o ran cywirdeb a dylai gwrthwynebiadau i'r CDLI adneuo gyfeirio at y profion hyn lle bynnag y bo modd.

Gellir hefyd gynnwys gyda'r sylwadau cais i gael eich hysbysu mewn cyfeiriad penodig yng ngham nesaf y CDLI a/neu fod y CDLI wedi'i gyflwyno i Lywodraeth Cymru i'w archwilio'n annibynnol a/neu fabwysiadu'r cynllun.

Ni all yr Awdurdod Cynllunio Lleol newid y cynllun ar hyn o bryd ond gall benderfynu a yw o blaid unrhyw newidiadau a gynigir. Bydd sylwadau a wneir yn unol â'r hysbysiad hwn (h.y. 'wedi'u gwneud yn briodol') yn cael eu hystyried gan Arolygydd annibynnol a benodir i archwilio pa mor gadarn yw'r cynllun.

Dim ond y rhai hynny sy'n gwneud sylwadau sy'n ceisio newid y CDLI adneuo a wnaeth sylwadau 'yn briodol' sydd â'r hawl i ymddangos gerbron Arolygydd yr Archwiliad a chael eu clywed ganddo.

Mae rhagor o wybodaeth am broses y CDLI a dogfennau cefndir perthnasol ar gael ar wefan y Cyngor yn <https://www.bridgend.gov.uk/residents/planning-and-building-control/development-planning/> neu cewch ffonio'r **Tim Cynllunio Strategol** ar 01656 643633 i gael rhagor o wybodaeth.

Richard Matthams
 Rheolwr Cynllunio Strategol

Social Media Posts, Bridgend County Borough Council Official Twitter Page

← Tweet

 **Bridgend CB Council** ✓
@BridgendCBC

🗣️ We've launched our Replacement Local Development Plan Consultation

We're looking for your views on our masterplan which will be used to determine what kinds of development can take place throughout #Bridgend County Borough between now and 2033.

➔ crowd.in/L8celd



Tweet your reply 

← Tweet

 **Bridgend CB Council** ✓
@BridgendCBC

🤔 Have you checked out our Replacement Local Development Plan Consultation yet? Our masterplan will be used to determine what kinds of development can take place throughout the area between now and 2033. Do you agree with our proposals? #HaveYourSay ➔ crowd.in/uOc7JZ



12:00 · 09 Jun 21 · [CrowdControlHQ](#)

Tweet your reply 

← Tweet

 **Bridgend CB Council** ✓
@BridgendCBC

A big thank you to our residents in #Bridgend County Borough 🙌

We've had a record number of responses for our Local Development Plan consultation.

Read more ➔ crowd.in/VmG3T8



10:01 · 09 Aug 21 · [CrowdControlHQ](#)

2 Likes

Tweet your reply 

Appendix 2: Bodies Notified in Advance of Deposit Stage Consultation

Organisation / Body	
Action on Hearing Loss	Business in Focus
Active Travel	CADW
AECOM	Caerphilly County Borough Council
Altaf Hussain MS	Cardiff Capital Region Cabinet
Arqiva	Cardiff International Airport Ltd
Arriva Trains Wales	CBI
Asbri Planning Ltd	Cefn Cribwr Community Council
Ashfield Land	Celtic Energy
Avison Young on behalf of National Grid	Cenin
Awen Cultural Trust	Chartered Institute of Housing Cymru
Barratt David Wilson Homes	Citizens Advice Bureau - Bridgend
Barton Willmore	Citizens Advice Bureau - Maesteg
Bellway Homes Ltd	City of Cardiff Council
Blaenau Gwent County Borough Council	Civil Aviation Authority
Bovis Homes Ltd	Coastal Housing
Boyer Planning	Coed Cymru / Welsh Woodland Organisation
BPM Technology Corp Ltd	Coity Higher Community Council
Brackla Community Council	Coity Walia Commoners Association
Bridgend and District YMCA	Colwinston Community Council
Bridgend Association of Voluntary Organisations	Community Rehabilitation Centre
Bridgend Business Forum	Compute (Bridgend) Ltd
Bridgend Civic Trust	Cornelly Community Council
Bridgend Coalition of Disabled Persons	Councillor Alex Williams
Bridgend College	Councillor Altaf Hussain
Bridgend Community Consortium for Education and Training	Councillor Amanda Williams
Bridgend County Allotments Association	Councillor Aniel Pucella
Bridgend County Borough Council - Conservation & Design	Councillor B Jones
Bridgend County Borough Council - Highways Department	Councillor Bridie Sedgebeer
Bridgend County Borough Council – Corporate Landlord Department	Councillor C A Green
Bridgend Designer Outlet	Councillor C E Smith
Bridgend Equality Forum	Councillor Carolyn Webster
Bridgend Town Council	Councillor D B F White
Bridgend Women's Aid	Councillor D G Owen
Bridgend Youth Council	Councillor D K Edwards
British Aggregates Association	Councillor D R W Lewis
British Astronomical Association (Campaign for Dark Skies)	Councillor Dhanisha Patel
British Gas Wales	Councillor Dr E Venables

Councillor G Thomas	Crown Estates Commissioners
Councillor Gareth Howells	Cwm Taf Morgannwg Public Health Team
Councillor H J David	Cwm Taf Morgannwg University Health Board
Councillor H M Williams	Cwm Taf University Health Board
Councillor J C Spanswick	Cwm Taf University Health Board - Director of Public Health
Councillor J E Lewis	Cymdeithas Tai Newydd Housing Association
Councillor J H Tildesley MBE	Dainton Group Services Ltd
Councillor J R McCarthy	Department for Business, Energy & Industrial Strategy
Councillor James Radcliffe	Department for Transport
Councillor Jane Gebbie	Design Commission for Wales
Councillor Jon-Paul Blundell	Disability Wales
Councillor Julia Williams	DL Thomas, RGL Thomas, RL Thomas
Councillor K J Watts	Dr Jamie Wallis, MP
Councillor Kay Rowlands	Dwr Cymru Welsh Water
Councillor Lyn Walters	Edenstone Homes
Councillor M Jones	EE
Councillor Matthew Voisey	Evan Williams & Sons
Councillor Mike Clarke	Ewenny Community Council
Councillor Mike Kearn	Federation of Master Builders
Councillor Nicole Burnett	Federation of Small Businesses
Councillor Norah Clarke	Fields in Trust
Councillor P A Davies	First Cymru
Councillor Paul Davies	Ford Motor Company
Councillor R E Young	Freight Transport Association
Councillor R M Granville	Garrison Barclay Estates
Councillor R M James	Garw Valley Community Council
Councillor Richard Collins	Gilfach Goch Community Council
Councillor Rod Shaw	Glamorgan Muslim Community Association
Councillor Ross Penhale-Thomas	Gofal Housing Trust
Councillor Roz Stirman	Great Western Trains Company Ltd
Councillor S Aspey	Groundwork Bridgend
Councillor Sadie Vidal	Guide Dogs Cymru
Councillor Sorrel Dendy	Gypsies and Travellers Wales
Councillor Stephen Smith	Hafod Housing and Hale Construction
Councillor Stuart Baldwin	Hafod Housing Association
Councillor Tim Thomas	Hale Homes
Councillor Tom Beedle	Hanson Aggregates
Councillor Tom Giffard	HD Ltd
Coychurch Higher Community Council	Health & Safety Executive
Coychurch Lower Community Council	Heaton Planning

Hendre Housing Association	Mr Christopher Elmore, MP
Home Builders Federation	Mr D Williams & Railway Paths Ltd
Home Office	Mr Damon Thomas (signed on behalf of the Landowners)
JCR Planning	Mr H Thomas, Rees Family and Grant Family
Jehovah's Witnesses	Mr Huw Irranca-Davies, MS
JEHU	Mr Karl Schubert
Jehu Group	Mr Keith James
Jehu Group	Mr Leonard Evans & Mr Nathan Evans
John E Jeremy Consultants	Mr T Davies
John Knight & Richard Knight	Mrs Meryl Wilkins
John Matthews Consultancy	National Air Traffic Services Ltd (NSL)
Kew Planning	National Grid
Kier Living Ltd	National Grid Wireless
Laleston Community Council	Natural Resources Wales
Landowners - Parc Afon Ewenni Regeneration Area	Neath Port Talbot County Borough Council
Lavignac Securities	Network Rail
Leaders Romans Group	New Link Wales
Lichfields	Newcastle Higher Community Council
Linc-Cymru	Newport City Council
Llamau Ltd	NFU Cymru
Llangan Community Council	O2 Airwave Service
Llangynwyd Lower Community Council	O2 Plc
Llangynwyd Middle Community Council	Ogmore Angling Association
Llanharan Community Council	Ogmore Valley Community Council
Llanmoor Development Company Ltd	Payton Jewell Caines Ltd
Llanmoor Homes	Pegasus Developments
Llynfi Valley Forum	Pencoed Panthers Running Club
Lovell	Pencoed Town Council
Luke Fletcher MS	Persimmon Homes
Maesteg Chamber of Trade	Persimmon Homes West Wales
Maesteg Town Council	Peter Brett Associates
Mango Planning & Development Limited	Plan R Ltd
Merthyr Mawr Community Council	Planinfo
Merthyr Tydfil County Borough Council	Planning Aid Wales
Minerals Products Association - Wales	Planning Inspectorate Wales
Ministry of Defence	Play Wales
Monmouthshire County Council	Pobl
Mr Alan Jones	Porthcawl Chamber of Trade
Mr Allan Fairfax	Porthcawl Civic Trust Society
Mr Ben Lewis	Porthcawl Town Council

Probation Services	The JEHU Group
Public Health Wales	The Ladbrooke Trust
Pyle Community Council	The National Federation of Gypsy Liaison Groups
Redrow Homes	The Ramblers Association
Redrow Homes (South Wales)	The Representative Body of the Church in Wales
Religious Society of Friends - Quakers	The Wallich
Rhondda Cynon Taff County Borough Council	Three (Hutchison 3G UK Limited)
Riparian Owners of River Ogmore	Thrive Assets
Road Safety Wales	T-Mobile Uk Ltd
Royal Institute of Chartered Surveyors Wales	Tom Giffard MS
Royal Mail Property & Facilities Solutions	Torfaen County Borough Council
Royal National Institute for the Blind	Toucan Planning
Royal Society of Architects in Wales	Transco / Cadent Gas
RSPB Cymru	Transport for Wales
RTPI Wales	Trustees of Merthyr Mawr Estate
Sarah Murphy MS	Tytheaston Green Ventures Ltd
Secretary of State for Wales, Welsh Office	Tytheaston Millennium Trust
Shelter Cymru	United Welsh Housing Association
Showmen's Guild of Great Britain - South Wales	Vale of Glamorgan Council
Sioned A Williams MS	Valleys to Coast Housing
South Wales Fire and Rescue Service	Various Collaborating Parties
South Wales Land Developments Ltd	Virgin Media
South Wales Police and Crime Commissioner's Office	Vodafone Limited
South Wales Police Crime Prevention Design Officer	Wales & West Utilities
South Wales Police Estates Department	Wales and West Housing Association
Sport Wales	Welsh Ambulance Service NHS Trust
St Brides Major Community Council	Welsh Government
St Brides Minor Community Council	Welsh Health Estates
Sustrans Cymru	Welsh Local Government Association
Tarmac Quarry Products	Western Power Distribution
Taylor Wimpey South Wales	Wildlife Trust South and West Wales
Taylor Wimpey Strategic Land	Williams Bro
Taylor Wimpey UK Ltd	WYG
TESNI Properties Ltd	Yellow Wales
The Coal Authority	Ynysawdre Community Council
The Equality and Human Rights Commission	
The Glamorgan Gwent Archaeological Trust Ltd	



Planning Aid **Wales**
Cymorth Cynllunio **Cymru**

Appendix 3: Community Engagement

Bridgend County Borough Council Replacement LDP Deposit Plan

Community & Town Council Events Issues Report

July 2021

CONTENTS

- 1.0 Context
- 2.0 About Planning Aid Wales (PAW)
- 3.0 Community and Town Council Deposit Plan Engagement Events
- 4.0 Summary of Issues Raised
- 5.0 Issues Raised at Each Event
- 6.0 Additional Issues Raised

Appendices

APPENDICES

Appendix 1 CTC Map

Appendix 2 Copy of Event Invite

Appendix 3 List of CTCs who attended at least one event

1.0 Context

Planning Aid Wales has been instructed by Bridgend County Borough Council (BCBC) to support the community engagement activity in relation to the Bridgend Replacement LDP - Preferred Strategy.

Our instructed brief was as follows:

To prepare and deliver five community engagement events between 1 June 2021 – 27 July 2021 in accordance with BCBC's Delivery Agreement. The events were targeted at town and community councillors operating within the Bridgend County Borough Council area. Due to Covid-19 regulations face to face events were not possible and all events were carried out remotely using Microsoft Teams.

To deliver the brief our work involved:

- Analysis and understanding of the Deposit Plan.
- Review of other key documents and activities including the Delivery Agreement, previous LDP engagement activity, previous barriers identified, key stakeholder contacts etc. and discussions with Planning Officers as required.
- Selecting, defining objectives and programming methods of engagement for the events.
- Attending and leading all events as facilitators for discussions and to encourage understanding of the current plan working together with BCBC Officers. The broad purpose of the events was to raise awareness and encourage responses to the Deposit Plan consultation which had a deadline of 5pm on Tuesday 27 July 2021.

In relation to the events our role was:

- i. To agree clusters of CTCs for the events and arrange suitable dates for the event. Invitations to interested parties to attend events.
- ii. Introducing the purpose, aims and key stages involved in the LDP preparation process.
- iii. Explanation of the key themes and proposals put forward in the Deposit Plan.
- iv. Chairing a discussions to capture initial feedback on the Deposit Plan.
- vi. Advise on next steps and how communities / stakeholders can input into the process.
- vii. Prepare a report of feedback and issues raised for BCBC Planning Officers.

In addition to the above, the session included a short introduction to Place Plans, in response to the potential role for such plans within the Replacement LDP.

As part of the process the following work was carried out by the Council:

- i. Provision of all relevant planning documents.
- ii. Provision of details of the Deposit Plan.
- iii. Translation of material to Welsh if required, this was not required for the events held.

The role of Planning Aid Wales in the drafting the issues report is to report back the issues and comments raised by CTC representatives at each event. Therefore, the issues and comments listed within this report are solely those of the CTC attendees who attended each event and do not represent the views of Planning Aid Wales.

2.0 About Planning Aid Wales (PAW)

Planning Aid Wales is a registered charity that advocates and supports community involvement in planning in Wales. Founded in 1978, we have 40 years' experience of helping individuals and community groups to understand and engage with the planning system. Our core services include delivering planning training to a range of audiences, developing easy read planning guidance and a free planning advice helpline. We are an organisation that has been commissioned for many community engagement in planning projects in Wales; we have built a significant repository of engagement methods, tools and techniques and regularly publish news on good engagement practice.

We recognise LDP preparation is an important avenue for securing more effective public involvement in planning; our current business plan identifies LDP review as one of the three elements in the planning process on which we focus our engagement efforts.

Planning Aid Wales is an advocate of meaningful community engagement in planning. Through our work, we seek to raise the knowledge and capacity of communities to engage, but not just in the activity at hand - we seek to enable people to effectively participate in planning activities on an ongoing basis.

As an independent third party organisation, we have found time and again that communities are willing to engage with us, even where Local Planning Authorities have encountered barriers to engagement in the past. As part of our process, we encourage active collaboration between Local Planning Authority staff and community groups, thereby building better relationships for future engagement. We take no view on any local policy or specific development; we only support individuals and communities to express their own views effectively.

We recognise that the planning system can be complex and the needs / wants of communities do not always align with other interests. We manage expectations by helping our beneficiaries understand that planning is a holistic system that seeks to address a wide variety of priorities, and clearly explain the scope and limitations of what the planning system (or particular activity) can achieve.

Planning Aid Wales is a 'not for profit' body; any income generated from our work is utilised to further support our aims of facilitating greater community engagement in planning across Wales.

3.0 Community and Town Council Preferred Strategy Engagement Events

The CTCs were divided into 5 groups to reflect their geographical location and as a means to focus debate at each event. However, it was also made clear that any CTC representative from outside each group could attend another event if required.

The CTCs are listed below, and the number is referred to in the detail of the event below.

No.	Name	No.	Name
1	Maesteg Town TC	11	Coychurch Higher CC
2	Garw Valley CC	12	Cornelly CC
3	Ogmore Valley CC	13	Laleston CC
4	Llangynwyd Middle CC	14	Coity Higher CC
5	Llangynwyd Lower CC	15	Pencoed TC
6	Pyle CC	16	Porthcawl TC
7	Cefn Cribbwr CC	17	Merthyr Mawr CC
8	Newcastle Higher CC	18	Bridgend TC
9	Ynysawdre CC	19	Brackla CC
10	St Brides Minor CC	20	Coychurch Lower CC

A map of CTCs is included at appendix 1.

Five events were held, and the groups of CTCs invited to each, and date of the event is listed below:

Group 1

Date : Thursday 10 June 2021

- Maesteg TC
- Llangynwyd Middle CC
- Garw Valley CC
- Ogmore Valley CC

Group 2

Date: Thursday 24 June 2021

- Newcastle Higher CC
- Laleston CC
- Cefn Cribbwr CC
- Llangynwyd Lower CC

Group 3

Date: Wednesday 30 June 2021

- Bridgend TC
- Brackla CC
- Coychurch Lower CC
- Coity Higher CC
- Merthyr Mawr CC

Group 4

Date: Thursday 1 July 2021

- Pyle CC
- Cornelly CC
- Porthcawl TC

Group 5

Date: Wednesday 7 July 2021

- St Brides Minor
- Coychurch Higher
- Pencoed Town Council
- Ynysawdre

It was advised by BCBC at the outset of the project that LDP Officers would not attend the events to allow for an independent discussion of issues.

Format of events

All events followed a similar format. Mark Jones, Planning Engagement Officer, Planning Aid Wales, introduced the event and provided an explanation of Planning Aid Wales and their role as independent facilitators for the event. The main presentation covered:

- PART 1 General LDP Policy and Procedures
- PART 2 BCBC Deposit Plan
- PART 3 How to Get Involved
- PART 4 Introduction to Place Plans
- PART 5 Conclusion

At the end of the Part 1, a brief question and answer session took place to address any issues on the process.

Mark Jones then delivered a more detail presentation on the content of Bridgend Replacement LDP Deposit Plan consultation document. Each event also focused on proposed development sites that were relevant to their particular areas, although views were also obtained on other sites if raised by attendees. Questions were invited and where possible responded to, the issues raised were also noted for inclusion within this report. Planning Aid Wales participated with all the discussions to listen to the issues raised and also to pose queries to facilitate discussion.

Given the role for Place Plans in the planning system, Mark Jones made a short presentation on principles of Place Plans and signposted various references that could be explored to learn more on this issue.

The event concluded with Planning Aid Wales repeating the deadline for comments on the Deposit Plan of 5pm 27 July 2021. It was emphasised that this was an appropriate time to make meaningful comments to influence the LDP as once the document moves to examination the opportunity to influence the plan will become less. Attendees were also advised that an independent inspector would examine the plan on behalf of the Welsh Government and prepare a report on the soundness of the plan.

Event attendance

All CTCs were invited to attend at least one event, a copy of the invite issued by BCBC is included in appendix 2. The table below summarises the attendance at each event:

Event	No. Attending
10 June 2021	3
24 June 2021	17
30 June 2021	22
1 July 2021	18
7 July 2021	4

A list of all CTCs who attended at least one event is provided in Appendix 3.

4.0 Summary of Issues Raised

The events generated a number of views and identified a number of issues from CTCs, and these are listed in section 5 of this report. It is noted that a number of issues raised were similar to those raised at the Preferred Strategy stage. In summary, there were a number of common issues which are summarised below under the following broad headings:

- Timing of the Deposit Plan
- Infrastructure
- Schools
- Affordable Housing
- Town Centres
- Employment and Industry
- Environment and Biodiversity
- Growth Strategy and CARM
- Tourism

Timing of Deposit Plan

Some comments were raised that some events have overtaken the draft plan. In particular it was felt that the plan had been drafted before the pandemic and therefore needs to reflect the changes in society that are occurring as a result of this. In addition, comments were raised that the timing of the consultation should not have taken place during the pandemic and when face to face events etc could not take place, and this would impact how people could engage and let the Council know their views. One comment also questioned the timing of the consultation in light of Council elections next year. Finally, a similar comment was made in relation to timing of the draft plan and the closure of the Ford plant.

Infrastructure

One issue that was raised consistently at all events was with regard to infrastructure. There was a feeling that new development was coming forward without the necessary infrastructure to support it. In particular concerns were raised regarding road and transport infrastructure. A number of delegates felt the road system and capacity across the Borough was not sufficient to accommodate new

developments. A common view was that development was coming forward which increased congestion and highway issues and these matters were not being adequately addressed through the planning process.

At the same time, it was acknowledged by some attendees that planning policy did look to reduce the use of cars in new development however, concerns were raised that public transport was insufficient to replace the use of cars. Therefore, new development would always generate car movements. Respondents' comments suggested that the availability and accessibility of public transport did vary across the Borough and between towns and smaller communities. Furthermore, some respondents suggested that there was a lack of parking spaces in towns and settlements, which also contributed to the problem, in some cases parking spaces were being lost to development without any replacement.

A particular issue that was raised in relation to transport was Jct 36 of the M4 which a number of respondents said often suffered from serious congestion, including tailbacks along slip road and motorway, and any new development which would lead to use of this junction would worsen the situation. However, some comments also suggested that a similar scenario was developing at Jct 35 and if some of the proposed developments went ahead this could also occur at Jct 37.

Other aspects of infrastructure concerns related to health facilities such as GP Surgeries. It was acknowledged that such matters were controlled by Health Authorities, but respondents suggested that where it was felt such services were full this should be a consideration to any proposed residential development.

Schools

A number of respondents at all venues raised the issue of impacts to schools. It was felt that current schools were at capacity and as such any new residential development was increasing the pressure on places and catchment areas. The main area of concern seemed to relate to, but not exclusively, primary schools. However, it was also pointed out that more school children would ultimately impact secondary schools. It was noted that new school provision was being provided as part of the development proposals, but it was felt this was not enough. In addition, the concern of wider catchment areas was raised particularly with regard to Welsh medium schools and therefore with an increase in housing there would be issues

for parents to find suitably local schools for their children. Examples were given of communities who were unable to send their children to their local/preferred school. Another issue raised with regard to catchment and increased school numbers related to traffic implications and adding to what was considered congested roads.

Housing

Queries were raised in relation to the housing need. Whilst the calculation to provide the balance of housing required was explained there were a number of views that considered this was still not justified. Another aspect that was raised at a couple of venues related to the relationship of the employment land provision and housing. There was a view that if 71.7 Ha of land was required to provide 7500 jobs then the housing requirement of 9207 did not reflect this. Another common comment related to the role of towns and villages within the Borough as dormitory settlements where people will travel to work elsewhere in particular Cardiff and, as such, was the housing requirement in part providing housing for the needs of other areas. Another concern raised at more than one event was that some proposed sites would lead to the loss of individual communities' identities and lead to merging of communities leading to a loss of their cultural and historic identity.

Affordable Housing

Affordable housing was identified by a number of respondents as being a key issue. It should be noted at the outset that there was some misunderstanding as to what affordable housing was e.g. cheaper market housing or the equivalent of council house provision. A regular request at all events was for a clear definition of what is affordable housing in the Borough. There was an overall recognition that affordable housing was required and should be adequately addressed in the LDP, but concerns were raised on why some areas required 30% affordable housing provision and other areas required none. It was also raised that affordable housing should meet the local needs and requirement of specific areas to allow people who wanted to remain in their home communities to do so.

Town Centres

Concerns were raised on the current situation of town centres, there was a general feeling that they were under pressure. It was considered that too many shops were

closing and remaining vacant. There was recognition that this was a wider issue than just BCBC area and factors such as internet shopping and more recently implications of the Covid-19 pandemic had impacted. It was also pointed out that the viability and attractiveness of a town centre also affected smaller settlements that used the larger towns such as Bridgend as their main centres. It was considered that there was a need for more investment and other uses to boost town centres. Parking issues were again raised as an obstacle to using town centres. Also, the lack of public transport meant the car was still the main mode of transport to such centres. In one area it was considered that parking was being lost to development and not replaced and this was actually adding to the problem and reducing the attractiveness of the town. In one event the issue of a proposed park and ride to serve Porthcawl was raised, and it was not felt this would address the problem particularly as it was not considered large enough to address the issue and that families going to the seaside would not use it. Implications for traffic around Pyle was also raised on this point. As mentioned non planning issues were raised as part of the problem as a constraint to providing a vibrant town centre. It was explained that the planning system and the LDP cannot really address the fiscal issues and also the issue of town centres is national issue across Wales and the wider UK and is subject to a current national debate.

Some comments were made on whether new uses could be brought to town centres to attract people e.g. café culture type developments.

Employment and Industry

Overall, there did not seem to be any major issues with regard this matter. However, some attendees questioned whether there was a manufacturing base for the Borough. In addition, as mentioned above there was concern in relation to new developments given the current infrastructure concerns. Some of the more rural CTCs and those north of the M4 suggested there was scope for small scale employment uses within these areas. A number of people identified current vacant sites that could be regenerated for this purpose. The potential future of the Ford plant was raised and whether the LDP was addressing the potential implications of this issue. It was suggested that work may be needed in conjunction with Welsh Government to attract investment to replace Ford as an employer.

Environment and Biodiversity

There was a general consensus across the events to safeguard the environment and biodiversity. A number of attendees referred to the need to protect and manage green spaces and ecological sites.

Growth Strategy and CARM

In relation to the Council's proposed strategy there were a mix of comments. Whilst there appeared to be a general understanding of the strategy there were concerns raised on some aspects. It was felt by some that there was scope for development in areas outside the proposed growth areas. In addition, it was considered that due to infrastructure issues some of the proposed growth areas would struggle to satisfactorily accommodate new development. One concern was raised that there appeared to be concerns re developing north of the M4 due to capacity issues at junctions but why did this not apply to development south of the M4.

Generally, nobody questioned the principle of the CARM strategy, however, many felt that it may not be achieved. In particular, issues were raised about addressing the issue of an ageing population, including some comments that an ageing population still contribute to the economic and social development of the Borough.

Tourism

Overall, it was felt that the aim to promote tourism was good. However, infrastructure issues were cited as a concern as to why this may be difficult to achieve particularly in the Valleys area. In addition, there was a concern that Porthcawl was not being properly considered in relation to tourism development and that too much emphasis on housing in the town. Parking issues and loss of parking to other developments were again cited as a major drawback to tourism development in the town. Finally, it was felt if tourism was to be encouraged there was a need to adequately promote such ventures including signage and marketing.

5.0 Issues Raised at Each Event

As mentioned previously, discussions took place at regular points in each event. Attendees were asked to identify issues which they felt currently existed and could be addressed within the Replacement LDP. In addition, they were asked whether the deposit plan would address these issues. A list of the issues raised by the CTCs are detailed below, under the heading of each event.

Event 1 Date: 10 June 2021

Attendees:

- Maesteg Town Council
- Ogmere Valley Community Council
- Garw Valley Community Council

Vision 2033

- Enhancing the physical environment is too broad an objective. Should look to at protecting or developing new rather than enhance. Enhancing is a broad term and does not meet people's expectations of what it means.
- Vision could refer to any Authority in Wales. Very generic. Nothing to argue against.
- Does not inspire me.
- Expand access to key services, what is the key service e.g. public transport it may take up to 3 hours to get to some places, but you can get there by public transport.
- What does expand mean more employees, more meetings, more phone lines etc.

Council Priorities

- Digitally connected how will this be done, family budgets for internet. Also, internet capabilities at the moment.
- Fibre optic does not go further than Pontycymmer does not go as far as Blaengarw. It is not easy to get infrastructure into the valley communities.
- Decarbonise and zero carbon seems to focus on homes – What about Business net zero? Industry will be a difficult area for this.
- People cannot afford these objectives.
- Net zero homes - Retrofitting not mentioned.
- Can you achieve this north of the M4 on older houses?
- If we have a climate emergency the priorities are a little fuzzy.

- There is a focus on economic issues e.g. attracting new businesses and no reference to quality of life and natural environment.
- Priorities relate to vision but focus on business and not residents and visitors.

Spatial Vision

- Development needs funding what funding is available to support initiatives the valleys want to bring.
- Need to invest in transport system, lighting to be safe. How do we market this to investors?
- Garw Valley not mentioned. Limited room for expansion due to geography. Therefore, missed out due to this constraint. But this does not mean there is a potential for growth e.g. tourism log cabins, pop up shops and markets for local traders' part of regeneration of Garw Valley.
- Look at roads but also other modes of transport.
- Number of empty properties (housing, commercial and schools) and derelict buildings could be put to use for smaller accommodation. There is a potential for work and housing.
- How much regeneration/ investment goes to areas like Bridgend and Porthcawl as compared to Ogmores Valley. Good reason is population. Important that Ogmores Valley understand what they can get. This may perception and the plan needs to explicitly address.

CARM

- Garw Valley has a high ageing population, this cannot be counterbalanced with no development. Type of houses are an issue; their condition can deter lenders. Unlikely to get new build in the Garw Valley which the young would like.
- Electric cars how will these be charged in the Valleys area.
- What is meant by skilled – broad definition. Does it mean a factory worker or new technology? Fear is that anyone with money move to live n South of

Borough and others can go to Garw Valley. Garw Valley is a poverty stricken area.

- Does CARM cover all or just parts of the Borough.
- Not enough good shops in the Valleys. How do you encourage this?
Attracting skilled workers suggest there is no skilled workers in the Valleys is this what is meant. Need to improve transport and housing. If this is correct it is a disservice to people of Valleys who are skilled too. Once we know what skilled means we can address the barriers.
- People in Garw Valley were key workers in the pandemic e.g. carers and public transport. Are these skilled?
- What date sates will be used to prove what is achieved?
- Is there a link to higher and further education organisations?
- Young people living with parents. Cannot get mortgage.
- Some will commute to Cardiff or Bridgend and move to these areas as they have better access to services and shops etc. In the valleys there is a long journey to access these.
- Lack of public transport impacts job potential for young.
- Isolation is a major issue. Older population willing to say younger people move away and there will be a problem to get young people into the area.
- There is a need to invest in the Valleys area to counterbalance drift from the valleys. No industries in the valleys to retain people.

Strategy

- Potential for Brownfield site sin the Garw Valley. Implications for reclamation of coal mining areas is this now greenfield or brownfield. Contamination may be an issue on such sites.
- Good re statement on Ogmore Valley and Garw Valley but what about small business. What about other aspects e.g. public toilets?
- Premises for local people to put their business in support local trade not just bring in from outside.
- Scale of development should not be major for housing or increase due to infrastructure issues. Scope for business development and not new housing.

- Big issue is access to the valleys due to geography. Is there an opportunity now post Covid to allow for more employment from home in the valleys? Improve digital access in the Valleys and then access not so important.
- Lot of investment outside the valleys area. It appears the valleys will be treated as a play area. There is a need for more investment housing, shops. Therefore, the strategy is imbalanced.
- What is the definition of affordable housing needs to be clearly defined to avoid misunderstanding?
- Positive to grown tourism in valleys area but there is a need to make area better first to provide tourism. This is further down people's priorities. Garw Valley have looked into tourism in depth and are happy to share their report and findings with BCBC.
- Windfarms fund mainly to improve buildings this is evidence of need for investment in the Valleys.

Housing distribution

- Windfalls where will they go and not take from another area.
- Affordable housing is fine but then they may not have access to employment.
- Land identified south of M4 but there are brownfield sites e.g. the old washeries site. Need for affordable housing be ideally more local needs housing for people to stay in the area.
- Housing needs the jobs and services too.
- Number of derelict sites to bring into use and housing may be the answer.
- Some of these sites having environmental improvements so are these now greenfield.
- Understand a lot of housing will be self-build and do not fit with the community. Land could have a better use for local needs.
- Mixed use sites may be an answer.
- Currently no integration between employment and housing.

Tourism

- Tourism needs infrastructure to support. Signs to direct to tourist and recreation facilities. Everything seems aimed at Porthcawl and not the Valleys. There is a need for investment.
- Example of cycle routes some of the best in UK but not known to the wider world.
- Signage is a problem to tourism.
- What is high quality accommodation?
- Talk of upgrading facilities what upgrade? What about the need for new facilities?
- What does foster mean?
- Should we look for event businesses and not once they arrive?
- What is unacceptable? there is a difference of opinion.
- Need for carking including electric cars.
- Overall there is a feeling that there is a lot of unknowns in the policies.

Conclusions

- LDP language may intimidate community members.
- What about reference to landowners such as commoners, NRW etc.
- Plan talks of unacceptable impacts, but this does not seem to include impact on communities and how the community lives.

Event 2 Date: 24 June 2021

Attendees:

- Newcastle Higher CC
- Laleston CC

Vision

No comment

Council Priorities

- Hard to decarbonise, energy sector all use energy.
- Targets are unachievable, the loss of gas boilers, lights etc.
- The needs to be a mixture of LDP and change in people's attitudes to achieve this.
- Cars how will this change need for homes with electric hook ups.
- Planning system is a problem – private sector dominated, and the plan is biased for more houses.

Strategy

- Building houses does not provide economic growth.
- There is an over development of housing – issues being a lack of infrastructure to accommodate, and communities lose identity.
- Water catchment requirement water butts need to be part of development. Solar panels but need to look at design.
- 30 % of housing is in this ward there needs to be a more balanced way.
- There is a shortage of services such as Doctor's surgeries.

CARM

- Ageing population should not be a major issue.

- Attracting skilled workforce has led to prices rising as it is becoming a commuting area.
- Valleys firms struggle due to travel issue but seems to an emphasis that it is better in England which is not correct.
- Ford how do we retain firms like this?
- Market forces will dictate. Employment policies outside planning needs to change to retain and encourage workers.
- Planning needs to change to reflect changes in personal circumstances such as single families, single people etc.
- Use old office to create Japanese style pods – too many vacant properties. Convert to solve homeless problems.
- Will the LDP help the Valleys area? Money to Valleys will depend on the firm and costs for transport etc.
- Number of good entrepreneurs and talent in Borough and need to be encouraged.
- CARM ideas has been tried before and it does not work. Aging does not mean you are poor. Elderly people are not necessarily downsizing they want large homes for family and grandchildren.

Spatial Strategy

- No infrastructure and services for amount of housing it cannot cope with this increase.
- Proposals and merging communities e.g. what happened to Coity.
- No ribbon development.
- Bridgend is becoming a suburb of Cardiff.
- 1 bed houses needed, and affordable housing needed.
- Plan is too much housing led.
- There will be more stress on small businesses.
- Where will the required services come from e.g. health, schools and highways.
- Too much urban sprawl, no infrastructure and previous LDP did not achieve this.

- This strategy for a magnet is not working but the approach is being repeated.
- Penyfai had a small site which destroyed an historical site, with biodiversity these were ignored and provide “a nightmare of a site”.
- Borough is becoming a commuting belt to the area and destroying communities.
- Deposit plan going down same route as the previous plan with only a couple of new ideas.
- Laleston proposal contrary to all aspects of Placemaking Charter. This will test the whether the aim is to achieve these aims.
- Abekenfig to Llynfi Valley drive through Tondu the road system cannot cope with existing development. Little villages are becoming rat runs.
- M4 Junction36 and 35 cannot cope.
- Employment increases we do not look after the roads on existing industrial sites so why would you come to Bridgend.
- Loss of town centre facilities to edge of towns – banks have gone services have gone.
- We do not learn lessons – Celtic Energy area is not reclaimed – drainage is an issue. How will Ford site be reclaimed.

Sites affecting Abekenfig area

- Junction 36 is at capacity difficult to see how it is possible to have any other development in this position.
- Road to Llynfi Valley will be an issue part dual carriageway but part single. Concern over development in Valleys Gateway even though less than previous plan
- Newcastle Higher see themselves as distinct villages and communities. Keen to keep communities separate.
- Concern from the Pentrefelin in Tondu though under NHCC several hundred houses but no infrastructure one road, small bridge and loads of accidents.

- Beautiful places in Garw and Ogmore Valley is hard to judge. There is potential for tourism. Infrastructure relating to tourism may be an issue depending on scale.
- Rail network to Maesteg could this be improved to encourage more use of public transport. Currently not meeting needs.
- Jct 36 is horrific for getting on or off. Nor is it nice just to cross from one side to another. Why is this a barrier to building north of the M4 and not a barrier to building south of the M4.
- McArthur Glen is a big pull to the area which impacts upon traffic.

PLA 3

- Breaks every planning principle.
- No case for the development has been made.
- No housing need has been put forward need reasons to oppose rather than to support.
- LPA arguing for land promotion for developers.
- Opposition is widespread.
- Where will primary school children go. – Bryntirion School cannot accommodate any more.
- Greenfield site.
- Impact upon flora and fauna.
- It will coalesce communities.
- Questionnaire does not ask the right questions and not site specific.
- Impact upon rights of way.
- There is a loss of faith in the planning system. The site must be removed.
- 3000 houses in ward.
- Infrastructure is not there for such a development e.g. school.
- Road closures would be required and there is no justification for road closures. Developer will want to go to the railway line by PenyFai.
- There is a loss of green spaces.
- S106 money will not come in and affordable housing requirement will reduce.

- Lack of trust as benefits are eroded.
- Concern is to the principle of development not scale a smaller development would not change things.
- Mistakes of the Broadlands development will be repeated.
- Historical context – Pilgrims Way- circular Bridgend Walk – Laleston stone trail and the “way of the law”.
- Archaeological interest as potential Roman and medieval finds under site.
- Environmental Issues.
- Bryntirion and Laleston merging.
- Lessons from past Broadland 900 houses now 2500.
- Fear of precedent for development north of Llanewydd Lane.
- Loss of road and providing pedestrianisation with associated impacts.
- Implications for coaches to nearby sports facility.
- PLA 2 is a better site to development due links to town centre.
- Loss of green wedge between Bridgend and Laleston.
- Coalescence of communities will occur, due to the extent of Laleston.
- Percentage of development will reduce on application. S106 not monitored and should be forced to happen.
- Bias to developers.
- Aspirational demands for affordable housing need more not less.

Travellers' sites

- 3 caravans in NHCC.
- Rural area.
- People understand the need but seems to be concentrated in the NHCC area.
- There can be an increase in numbers

Event 3 Date: 30 June 2021

Attendees:

- Bridgend TC
- Brackla CC
- Coychurch Lower CC
- Coity Higher CC
- Merthyr Mawr CC

Vision

No Comments.

Council Priorities

- Smaller areas are overlooked.
- Depends on what is meant by overlooked e.g. Coity has been overwhelmed in recent years.
- Understand the links to Bridgend.
- But more should have been done to push development into the Valleys to regenerate these developments.
- Impact of traffic in Coychurch from heavy traffic on roads – no effort to solve this issue. A473 is an issue but no plan to address it. This does not seem to be included in the plan just one reference.
- Coity is at the other end of the road so echo above comments.
- A473 has got much busier when Brackla but promised a roundabout under the bridge at Singletons but did not materialise.
- Concerns that new development will lose the identity of villages and this is not wanted.
- Fear that there will be a greater Bridgend area.
- Development on A473 towards the A48 junction. BCBC needs to address this matter to provide more detail and address the uncertainty.

- Constraint to development in the Valleys is recognised. But these constraints exist close to the larger settlements. These need to be addressed before any new development considered.
- Concern of development in the LDP in Bridgend Town Centre. How much influence is Capital Region Deal on Bridgend? Is the proposed SDP impacting and influencing the decision of Planners in Bridgend?
- Bridgend could turn into a dormitory town.
- What is driving the plan it appears to be externally driven and not internally driven.

CARM

- Incomers coming into the Borough to work elsewhere.
- Need to encourage the younger generation to and provide affordable housing and green spaces.
- Jobs leaving Borough.
- Disagree with the view we are here to serve other places.
- The in migration is benefitting Cardiff not the Borough.
- This is leading to the loss of villages and villages are being subsumed into the larger towns.
- Lost the heart of Bridgend. Old Market Town underused. It needs to be preserved it is not benefitting from any of the new developments.
- It is underused due to Macarthur Glen, out of town shopping and online shopping.
- How can the place plan for Bridgend be developed further?
- The young entrepreneurial people are leaving there is nothing here it is a dormitory town.
- CARM does not balance it will only bring people into live here. People will work elsewhere. It will be a spill over for people working and using Cardiff.
- Where are the offices in Bridgend everything is being dragged into Cardiff?
- Need to encourage office HQ type development into Borough. Link to Welsh Government to help this.

- How much influence can Council Officers have to bring retail to Bridgend. Need independent traders.
- Encourage people into the town centre – hospitality sector, cafes, arts, music, wine bars.
- Shops that offer something you cannot get in Tesco.
- More town centre spaces.
- Use of water as an attraction nice river in town.
- Allow traffic into the centre – parking and shops.

Spatial Strategy

- No infrastructure for the housing requirement. This will compound problems.
- There are more houses than jobs. Where are the jobs demand not driven by Bridgend? It is artificial growth being used to support other areas.
- Affordable housing is 20% enough. What is definition of affordable housing?
- Plan is housing driven.
- Support tourism strategy.
- What sort of tourism is being sought in the Valleys area?
- Not much holiday accommodation in the valleys. Recreation use is likely to be locally driven not from further afield.
- Question strategy for tourism when Salt Lake Car Park being redeveloped for a supermarket.
- Is there a tourism strategy?
- Porthcawl is first stopping point in Wales. But we are filling it with houses and supermarkets. Supermarkets needed but current proposal takes prime tourism site.
- The proposed strategy is a lazy strategy. Maesteg should have more development – encourage more development into these wider areas.
- Improve infrastructure to encourage development in these areas. Revive these communities.
- Settlements such as Pencoed and Coychurch not underutilised it is full of houses. Where else can you develop which is underutilised? Should not be classed as a sustainable growth area.

- Concept of this amount of housing in big blocks around Bridgend is not the correct way. Quantity is the problem not necessarily the place.
- Tourism – Porthcawl, Coastal Path at Merthyr Mawr. Island Farm development would jeopardise the dipping bridge and other beauty spots. The proposed housing development will undermine the tourism benefits.

PLA 2

- What about air quality it is currently poor – the development will make it worse.
- What will happen to the senior school increased cars and problems.
- What will happen to the Heronsbridge buildings probably more houses?
- The area cannot accommodate more development.
- Air quality at Ewenny roundabout been an issue for a while and this will make it worse.
- Comparison to the sports village this is not accurate and cannot compare.
- How the LDP sets out traffic on A48 is “laughable”.
- Consider at same time Laleston scheme impact to Ewenny and Tesco roundabouts – bottlenecks.
- Knock on effect on New Inn Bridge Road.
- Increase rat runs and cannot blame the tennis academy.
- Impacts on countryside and Merthyr Mawr Village.
- Not enough information on the proposal.
- Traffic report does not give enough information.
- Parc Derwen 2 form entry School is too small for the needs already. The current proposal is too small.
- Impact on Merthyr Mawr Village – road structure, sand hills which are an SSSI. Houses should not be here. It will be like the “pyramids in Egypt”.

PLA 3

- Traffic will be an issue.
- Impact on tourism traffic to Porthcawl.

- Too much.
- A48 cannot sustain these developments.
- Same number of houses but this site has a bigger school than PLA 2.
- Question 12.8 ha outdoor recreation facilities and open space, what will be done with it.
- Does it incorporate the SINC?

Ent 5

- If all houses were necessary, which is disputed, for natural growth of Bridgend has the LDP not now been superseded by Ford closing. Is the answer to put all housing on the Ford site.
- Take pressure off A48.
- Not saying it is a good idea, but has it been considered.
- Traffic better on A48 but may impact A473.
- Are companies being approached to look at the site as a commercial enterprise. Benefits to Bridgend.

Affordable Housing

- Why does Porthcawl have twice as much affordable housing % as Bridgend?

Other issue

- Refer to Island Farm - previous Inspector examination agenda for the Island Farm development which suggested issues of concern.

Event 4 Date: 1 July 2021

Attendees:

- Porthcawl TC
- Cornelly CC
- Pyle CC

Vision

- Hardly likely to be anything unacceptable. Find it meaningless and inane.
- Summer brings number of cars to Porthcawl if all houses go up where will people park.
- The ALDI car park will have impact on public car parks.
- There is a loss of parking e.g. Salt Lake Car Park cut in half, will take shoppers away from town.
- Most houses built from harbour to sandy bay; parking will disappear.
- House built in areas on non-designated sites e.g. 900 houses north of Nottage Road, more at DanyGraig and Cypress Road. Cannot find these sites in the plan. These sites should be clarified.
- Nobody from Porthcawl had a say in the plan. Traffic can be a large problem particularly during bank holiday. Losing 1000/1550 parking spaces at a time when population will increase by at least 2500 people.
- Sandy Bay and Salt Lake go ahead meets the needs that are required. Other sites may not be needed.
- Some sites mentioned were candidate sites which have been excluded at phase 1 all that is going forward is Sandy Lane and Salt Lake.

Strategic Vision

- Disappointed that despite request to be involved in the decision making. No response received. No representation from Porthcawl, Town Council only hear at same time as anyone else.
- Lack of understanding of Porthcawl.

- Asset transfer of playing fields previously and how can you take with one hand and put back with another.
- Plan is written in planning jargon and not easy to understand.
- Electricity substation circa £1.1m – needs to be considered, does this mean new homes will not have electricity.
- Overall plan affects North Cornelly more than Pyle as most is east of the railway.
- Possible volume of traffic.
- Houses are needed but where do they go?
- Pyle does not have same issues as Porthcawl such as parking.
- Do agree with plan in general but need to look again at Cornelly and Porthcawl.
- People need housing – stumbling block is the infrastructure is never considered, never on the ground to see how it affects people personally.
- Don't consult with people on the ground.
- Infrastructure is key – should be considered. It affects people long term and this needs to be considered.
- Porthcawl needs housing – as does the Borough. Know the detail of houses on waterfront.
- Don't know what tourism is promoted is it another Coney Beach or a five star resort.
- Pleased there is a new school, but it is Welsh medium what about English medium. Impact on matters such as doctors' surgeries. More people will exacerbate this
- Only parking solution is park and ride in Cornelly and bus into Porthcawl. Is Cornelly happy to be a car park for Porthcawl. Park and ride are not feasible.
- Tourism offer is diminishing. Loss of serviced accommodation. Where will caravans and tourers go? Some existing sites going to permanent cabins.
- How will doctors surgeries cope.
- Park and ride good idea but are proposed site the best probably the only site to put it. But will families use a bus with beach equipment. Lead to congestion.

- Welsh medium schools have no catchment area therefore increased car for children.
- People come to Porthcawl to look at traffic jams.
- The LDP will kill the town and make nothing more than a dormitory town.
- Residents already complaining about the noise and pollution on South Road and Woodland Avenue.
- Residents complaining houses starting to crack due to vibration.

CARM

- Some houses have 5 cars – parents, teenagers and parents.
- Nothing to keep youngsters in a job, not many jobs only summer jobs. Once they go to university they do not return.
- Shops are declining.
- No counterbalance of ageing population in Porthcawl.
- Porthcawl is a dormitory town to serve Cardiff and Swansea.
- There are young people and families in Porthcawl.
- Porthcawl been sold for years as a place to retire which skews the population age.
- Different situation in Cornelly, less transitory population. Don't have as many leaving or arriving like Porthcawl.
- There is Pyle industrial estate providing jobs.
- The population is ageing but it is something we aim for.
- Ageing population in Pyle many over 65.
- Industrial estate provides some work but not convinced this is only source, easy to travel to other areas.
- Not a lot to disagree with CARM, it is ok in principle. We need to attract more young people and economic activity to the area.
- CARM are laudable aims.
- Affordability of housing an issue in Porthcawl.
- Whether this can be achieved is another matter.

Spatial Strategy

- 30% housing affordable hopefully offered to those with connections to the towns. No affordable housing in Pyle, Maesteg, Kenfig Hill or Cornelly where it is equally important.
- Need a definition of affordable housing.
- 7500 new jobs are less than the new houses this does not seem to make sense within the growth strategy.

Strategic Growth Areas, Regeneration Growth Areas, Regeneration Areas

- Pyle land is north of the A48 main concern is impact on the A48, no plans to improve the road structure.
- Younger people move to area to work, there no secure job opportunities in the area. Industrial estate is small units. 2000 houses will not work in Pyle or Cornelly. Idea seems flawed.
- Nice to be designated but there is nothing there. Will it just be housing for commuters; it is doubling the size of Cornelly.
- Existing transport issues in Cornelly.
- Areas are connected but are old established communities. The current proposal will have a greater impact.
- Valley areas need the growth – people are moving away.
- Encourage people into the valley areas – services are closing.
- Tourism promotion into the valleys.
- M4 corridor the area will be used as commuting hose to work elsewhere.
- People come to Porthcawl for what it is but nothing for young people. Need services and facilities for people who do not want to travel.
- There is a need to retain green spaces and biodiversity.
- Logical expansion of underutilised sites. Sandy Bay was closed what will happen to this. Is it likely to be expensive housing?
- Tourism being taken away from Porthcawl and move it to the Valleys.
- No action in Porthcawl just looking at the valleys.
- Building issues on Sandy Bay due to ground conditions.

- Porthcawl needs to compete locally, nationally and internationally. Miners' fortnight has gone. Need to target day visits and not 2 weeks to compete with likes of Majorca.
- Trecco Bay currently full – people would stay 2 weeks; some stay a month and some whole season. Traffic problems will impact these people.

PLA 1

- Loss of car parking. Need a plan to address the loss of these spaces.
- No detail as to what tourism. Will it be like Blackpool or the Celtic Manor. More detail required to justify the house numbers.
- All that will be provided is “posh” houses and a supermarket and a bus station to Pyle. People will not park in Pyle.
- Parking is a major issue how can we accommodate the additional and loss of parking.
- Plan is not thought through and not discussion with local people.
- Shuttle form Pyle station to Porthcawl. 70 cars this is not worth it as traffic to Porthcawl significantly higher.
- There is a need for more information on the station and the shuttle service.
- Overall, can't see it happening.
- Plan is pre Covid and attitudes have changed.
- Parents with children will not use the bus.
- People will park on Rest Bay common.
- This scheme will not meet the aims of CARM.
- Housing to generate Council tax revenue.
- Land zoned for leisure and commercial but no detail what this may be and how much land this will provide. Local need for a pump track but cannot gain advice on a suitable location.
- Porthcawl is jewel in the crown but is neglected, when addressed the aim seems to be demographics rather than regenerating the town.
- Covid will change things e.g. staycation therefore added increase in interest.
- People who work in town park on streets, where will the workers park. Houses must have adequate parking spaces.

- Bridgend plans as café culture is good, this strategy does not seem to apply to Porthcawl, and emphasis is on housing.

PLA 5

- Volume of traffic on roundabout at Pyle.
- Will lead to congestion at Pyle, Cornelly and Kenfig Hill.
- What is meant by affordable housing?
- Will be a dormitory town.
- Lack of infrastructure.
- This will repeat the issues of Park Derwen, caused problems with motorway junction at capacity.
- The current proposal will create the same problem at a different junction.
- To stop commuting part of the site should be a business park with offices and employment.
- Everything will go into Pyle – lack of infrastructure. Recycling centre once relocated will increase traffic issues. Current implications of parking on road, station park and ride will add further issues.
- Jct 36 has back up on motorway.
- When there is an accident on M4 everything stops in the locality. What happens if there is no provision in either direction. More houses and issue will get worse.
- Doctors is a problem more houses will be an issue. There will be an impact on the quality of people's life. Not just providing a house but there is a need to live after.

Tourism

- SP16 says Porthcawl is a resort this needs to remember and not just a housing location.

Event 5 Date: 7 July 2021

Attendees:

- Coychurch Higher CC
- St Brides Minor CC

Vision

- This is prepared by the current local authority and there are elections next year which may impact direction.
- Many things happening in the Borough that affect access to key services.
- All that is being built is housing impacts on services such as schools, medical centres etc. Schools made worse by no catchment area. One example of implication of new housing and new school if places all filled by new residents no places for children from Heol Y Cyw where their school was closed.
- Ironic that the reference to “ transformation..... continue safe and inclusive networks.”. Housing is impacting negatively on settlements and communities including historic settlements. Harmful impact being the increased number of houses and associated traffic.
- Sustainability needs to be more community based rather than connecting with the regions.
- Connectivity impacts such as emissions.
- 700 houses in Pencoed, previous promise for children in Heol Y Cyw to go to school already difficulties . Mention of school but not in timescale of the houses where will the children go to school.

Spatial Vision

- Bridgend should be the principal town but need to regenerate the Bridgend Town Centre. There needs to be investment in the town. Out of town development have had a negative impact on town centre e.g. The Pines/ McArthur Glen, Dunelm Mill. Not just shops but drive thru cafes etc impact.

- M4 Traffic at The Pines etc is causing problems adding to the Valleys traffic. M4 west can be a car park at times.
- Changed layout of Jct 36 has caused problems, it doesn't work efficiently. This means Coity, Heol Y Cyw and parts of Pencoed have had to take the extra traffic. Traffic leaving Jct 35 to avoid Jct 36 leads to issue on the surrounding roads.
- It is noted that there is a plan for Bridgend, but this is not enough to make it look pretty. There is a need for economic investment. There is a need for a magnet shop. There is no innovation and town has much to offer. Rejuvenate Bridgend other issues such as policing and anti-social behaviour have implications.

CARM

- The deposit plan won't achieve CARM.
- Younger generation not being accommodated in relation to work and services.
- Only thing that is happening is building houses.
- Nothing for children to do - no play areas etc.
- Public transport is poor.
- Everything is going into new housing areas it is "Americanising" the Borough.
- The more rural areas are being excluded.
- Age is just a number older generation can still contribute.
- Lots are being lost e.g. Fords, Ineos, shops in towns.
- Example library moved to recreation centre, but bus service cut so older generation can't get there.
- Needs to be more than just buzzwords.
- Loss of agricultural land on hinterland
- Loss of historic elements of towns.
- More housing but no support for agricultural businesses.

Spatial Strategy

- 1977 affordable houses but no services, services are saturated.
- Feels that numbers are “just being pulled for a hat”.
- Bridgend needs more trees and areas to breathe.
- Housing figures are to provide housing for commuters or retirement.
- There is a move from Bridgend to more affluent areas.
- Where will these new residents work and where are they coming from?
- Young people are priced out.
- Is affordable housing enough.
- Maesteg regeneration not appropriate queues already from Tondu to Maesteg. If this doesn't improve the paper mills will go.

PLA 4

- Too much already – too many houses.
- Traffic issues arising from the development.
- Two hours to travel from Bridgend due to lights.
- Pencoed does not need to get any bigger.
- School is not being built before the houses are built – infrastructure cannot cope. Need infrastructure to town not out of town.
- Road system cannot cope.
- No positives In PLA 4.
- If you build in Pencoed people will travel elsewhere and not into Bridgend.
- Talbot Green, in RCT, facilities built on periphery of Talbot Green allowing walking from small outlets to larger. This is a better solution and not encourage driving out to shops.

PLA 7

- This is a good policy.
- Agree with resisting development.
- Why not build infrastructure to by-pass railway. Lot of traffic from Coity – cannot get across the railway crossing.

- It is an ongoing issue and small villages are suffering.

Tourism

- Borough could be improved. Wider visitor attractions.
- Tourism needs investment.
- Insufficient sport, recreation facilities need to reflect the Future Generations and Wellbeing Act.

Traveller Site

- How are figures derived and do they include new age travellers?

6.0 Additional Issues Raised

The following issues were raised which do not directly relate to the LDP content. Again, the views below are solely those of the CTC members attending each event.

- S106 and standing up to developers.
- What consultation is being proposed for the general public?
- What is being done to seek views from people who do not have access to online means?
- Why consultation during the pandemic.
- Are there paper copies of the Deposit Plan available?
- Timescale for comments was too short and someone had told all they had to do was raise issues by July 27 and they could give more details later.
- Not enough information and one CTC have requested a transport statement related to previous potential development.

Planning Aid Wales discussed these issues with Officer's at BCBC and have responded to the Clerks of the relevant Councils on these points.

APPENDIX 1



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- | | |
|---|---|
| 1 - Maesteg Town Council | 11 - Coychurch Higher Community Council |
| 2 - Garw Valley Community Council | 12 - Cornelly Community Council |
| 3 - Ogmores Valley Community Council | 13 - Laleston Community Council |
| 4 - Llangynwyd Middle Community Council | 14 - Coity Higher Community Council |
| 5 - Llangynwyd Lower Community Council | 15 - Pencoed Town Council |
| 6 - Pyle Community Council | 16 - Porthcawl Town Council |
| 7 - Cefn Cribbwr Community Council | 17 - Merthyr Mawr Community Council |
| 8 - Newcastle Higher Community Council | 18 - Brigend Town Council |
| 9 - Ynysawdre Community Council | 19 - Brackla Community Council |
| 10 - St Brides Minor Community Council | 20 - Coychurch Lower Community Council |

APPENDIX 2

Mark Jones

From: Mark Jones
Sent: 26 May 2021 08:42
To: Mark Jones
Subject: Bridgend Replacement LDP Deposit Plan CTC Engagement

Importance: High

Dear All

Planning Aid Wales has been engaged to run events for all Town and Community Councils in Bridgend County Borough during the consultation period. These events will provide more information on the LDP process, the implications of the Replacement Deposit Plan to your community and how you can comment on the content of the Plan. Planning Aid Wales (PAW) is a registered charity supports community engagement in planning in Wales. We have extensive experience of helping communities understand have their say in the planning system. PAW recognises LDP preparation is an important avenue for securing more effective public involvement in planning. At the events, Planning Aid Wales will be independent and impartial and will seek to encourage you to put forward your opinions. We will capture this information and report it back to the Council to consider as part of the Replacement Deposit Plan consultation.

We are therefore inviting you and members of your Council to attend a workshop session to discuss the Deposit Plan Consultation and for you to put forward your views on the relevant planning issues related to the consultation.

There are 5 engagement sessions planned and to focus discussion to particular areas the CTCs have been grouped together accordingly to allow discussion of particular areas.

Session 1 will take place on **Thursday 10 June 2021 between 6pm – 8.30pm**

Session 1

- Maesteg TC
- Llangynwyd Middle CC
- Garw Valley CC
- Ogmore Valley CC

Invitations are open to any interested member of your council to attend any of the events. Please could you let us know the names and contact details of any Councillors and / or Clerk wishing to attend by booking online below, emailing mark@planningaidwales.org.uk or alternatively calling 02920 625 904.

Booking Link: <https://www.eventbrite.co.uk/e/bridgend-county-borough-council-replacement-ldp-deposit-plan-consultation-tickets-155788372215>

The event will be held virtually online using Microsoft Teams, the relevant link will be sent out to all in advance of the event.

If you or any member of your Council cannot make this date please let me know and I will see if we can accommodate them at one of the other events.

If you have any queries please do not hesitate to contact me.

Kind regards


Mark

Mark Jones

Planning Engagement Officer | *Swyddog*
Ymgysylltiad Cynllunio



Planning Aid **Wales**
Cymorth Cynllunio **Cymru**

 02921 660904 ext. 206

 mark@planningaidwales.org.uk

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Rudym yn cefnogi ymgysylltia a cynunedol mewn cynllunio

We support community engagement in planning

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APPENDIX 3

LIST OF CTCS WHO ATTENDED EVENTS

1. Ogmore Valley CC
2. Garw Valley CC
3. Laleston CC
4. Newcastle Higher CC
5. Brackla CC
6. Coychurch Lower CC
7. Coity CC
8. Bridgend TC
9. Merthyr Mawr CC
10. Cornelly CC
11. Pyle CC
12. Porthcawl TC
13. St Brides Minor CC
14. Coychurch Higher CC