

# 5. Housing

## 5.1 POLICY H1.9 Location of Housing Development Bryndu Central, Kenfig Hill

### **Objection**

DO/50332/357

Mrs A L Legg

### Issue

5.1.1 This is whether or not the allocation has been made with sufficient regard to the effects of new housing on traffic generation and car parking.

### Conclusions

5.1.2 The objector describes recent increases in traffic and on-street car parking in the vicinity of the allocated site, as well as specific incidents concerning road safety and delay to an emergency vehicle. The Council advises that the allocation for new housing is a long-standing one. I saw at my site inspection that some recent housing development has taken place in the north of Kenfig Hill, with provision for private off-street parking. This should curb the spread of on-street parking in the locality. The highway authority has had opportunities at the preparation stages of the Ogwr Borough Local Plan and the deposit UDP, as well as when a planning application was submitted, to assess the effects of new housing development on traffic movements and highways in the area. I have seen no objection from the highway authority to this allocation, and the evidence is that the impact of the housing allocation would not be significantly harmful to local highway conditions.

5.1.3 I am sympathetic to the objector's perception that increases in traffic are degrading the environmental quality of established residential areas. I also appreciate that there is substantial on-street car parking associated with established land uses in this locality, but I agree with the Council that improper car parking is a matter for other authorities and not the UDP.

### Recommendation

5.1.4 I recommend that no modification be made.

## 5.2 POLICY H1.14 Location of Housing Development Maendy Farm (2), Bryncethin

### **Objection**

DO/51209/1651

Countryside Council for Wales

## Issue

5.2.1 This is whether or not the site should be allocated for housing.

## Conclusions

5.2.2 The objector indicates that it is aware of possible wildlife interest on this land, although the site is not designated as a site of national, regional or local interest for nature conservation. The deposit UDP includes a number of policies, notably Policy EV20 as amended by the PIMS, which would protect wildlife outside designated areas, in the event that development is proposed. In view of the need for sufficient land to be allocated to meet the future housing requirement of the County Borough, I conclude that the housing allocation should remain.

## Recommendation

5.2.3 I recommend that no modification be made.

### 5.3 POLICY H1.17 Location of Housing Development Waterhall Road, Kenfig Hill

#### **Objection**

DO/50332/358 Mrs A L Legg

## Issue

5.3.1 This is whether or not the allocation has been made with sufficient regard to the effects of new housing on traffic generation and car parking.

## Conclusions

5.3.2 This objection raises similar issues as the objection made to Policy H1(9) Bryndu Central, to which I have responded in section 5.1 above.

## Recommendation

5.3.3 I recommend that no modification be made.

### 5.4 POLICY H1.25 Location of Housing Development Parc Derwen, North East Bridgend

#### **Objections**

DO/50864/896	Coity Village Association
DO/50864/897	Coity Village Association
DO/50864/903	Coity Village Association
DO/50003/337	Mr W C Rickard

## Issues

5.4.1 These are:

- Whether or not the allocation conflicts with the aims of national planning policy and the UDP to achieve sustainable development and protect the countryside;
- Whether or not the allocation would be harmful to the environment of north-east Bridgend and the quality of life of existing residents, having particular regard for the historic village of Coity.

## Conclusions

### **Sustainable development**

5.4.2 On the first issue, the Coity Village Association is concerned that the proposed Parc Derwen housing development coupled with other expansion plans on the north-east side of Bridgend will 'create an urban sprawl where attractive countryside currently exists'. However, it is accepted that the principle of development for up to 1200 dwellings was established by the adopted Ogwr Borough Local Plan, 1995. The UDP proposes to provide 1500 dwellings on the site, and the objectors argue that the additional 300 dwellings is in conflict with the Local Plan, and should not be treated as a 'commitment' when preparing the UDP.

5.4.3 This site was allocated for housing development in the Ogwr Borough Local Plan following a study of alternative means of meeting the projected dwelling requirement for Bridgend and of alternative sites. The Parc Derwen site was the subject of objections heard at the Local Plan Inquiry, and the Inspector recommended that, under Policy H4, it should be one of two major releases of land providing not more than 1200 new dwellings.

5.4.4 The Council has reviewed all the former Local Plan housing sites, prior to publishing the deposit UDP and has confirmed that the Parc Derwen site should be allocated. Indeed, the Council advises that significant progress towards implementation has been made on land assembly, advance off-site infrastructure works, a development brief, an outline planning permission, public consultation and negotiations on a S106 obligation. I consider that substantial resources have already been invested in this site which should not be set aside lightly.

5.4.5 The allocation at Parc Derwen is not in keeping with limited dispersal of development sites, or re-using previously developed land. Nevertheless, the effect of major housing development at this location on countryside and agricultural land was assessed by the previous Local Plan Inspector, before he reached his conclusion that it should be allocated. PPWales describes the NAW's vision for everyone in Wales to live in good quality, affordable housing, and this site would make a significant contribution to meeting future housing requirements in the County Borough. I disagree with the objectors who contend that the housing programme for Bridgend is excessive, and explain in my Chapter 4 that I consider the projected land supply to be about right. In the event that Parc Derwen did not proceed or was reduced significantly in scale, I have no evidence that alternative, brownfield sites within the main settlements could be identified to meet such a substantial element of the projected housing requirement for the County Borough. In this case, I consider that the loss of countryside is outweighed by the requirement for additional dwellings. In my opinion, the housing allocation at Parc Derwen is a very important commitment within the UDP.

5.4.6 The allocated area shown on the UDP's Proposals Map is very similar to the one identified in the Ogwr Borough Local Plan. The objectors, with the exception of Wilcon Homes Western, argue that it should not accommodate as many as 1500 new dwellings. However, I consider that the increase in the target figure for the site is consistent with the principles of sustainable development, and making the most efficient use of developable land. The objectors argue that the housing numbers have been increased without related enhancement of infrastructure. The development brief by Messrs Llewellyn-Davies and others illustrates how some 1500 dwellings, including high, medium and low density housing, as well as other land uses and open space could be accommodated on this 85ha site. An environmental statement and a transport impact assessment accompanied the planning application to develop this site. In my opinion, the implications of more intensive development of the site have been addressed. I respond to the objectors' concerns about impact on the transport network in my Chapter 8.

5.4.7 The Coity Village Association contends that adoption of the development brief as SPG in December 2001 was contrary to advice in Unitary Development Plans Wales (CD001), since it proposed more dwellings than the upper limit of 1200 set by Local Plan Policy H4. The Association is also critical of the Council's approach to determining the planning application for 1500 dwellings, when duly made objections are being considered in parallel at the UDP Inquiry. Whether or not the current scheme is consistent with the Local Plan, the new PPWales, para 9.1.2, seeks the most efficient use of land, with well-designed environments, where appropriate at higher densities. The development brief indicates that additional dwellings can be satisfactorily accommodated at Parc Derwen. I conclude that the provision of 1500 dwellings would accord with national policy and would not be excessive. On this basis, I conclude that the allocation for Parc Derwen shown in Policy H1(25) of the UDP should be retained.

5.4.8 Though Wilcon Homes Western asserts that the site could accommodate a greater number of dwellings, they provide no supporting evidence for this view. The development brief shows that a district centre, primary school and open space would be included in the development, as well as new housing. In addition, account needs to be taken of both the environmental impact and transport impact of this major residential development on the wider area. I shall not recommend that a higher number of dwellings be allocated.

## **Local Impact**

5.4.9 The Coity Village Association argues that the Parc Derwen housing allocation, together with the proposed Sarn Park industrial estate and Sarn retail park would 'overburden' north-east Bridgend. The objector seeks a significant reduction in the scale of the proposals to protect the quality of life of residents in existing communities. I have responded to duly made objections in respect of Sarn Park in other chapters of my report, notably Chapter 7, Employment, and Chapter 9, Retailing. I recommend that land should not be allocated there for future development and I consider that this should remove some of the development pressures north-east of Bridgend.

5.4.10 Regarding the effect on Coity, I accept that the setting of this village will be changed by the development of Parc Derwen. I recognise that this is an ancient settlement, and that its substantial architectural and historic interest, recognised by its conservation area status, should be preserved or enhanced. However, the development brief shows a wide open space buffer along the full length of the boundary on the north-west side of Coity village. The brief also refers to low density housing at Parc Derwen overlooking the open space. I consider that the form of development illustrated in the development brief should ensure that Coity retains its separate identity, and that the quality of life of its residents is not compromised. There is a statutory duty to preserve, at least, the character and appearance of the

Conservation Area, and the maintenance of the surrounding open space should help to safeguard the village.

5.4.11 I understand the concern that traffic problems in Coity village could be exacerbated by the development of Parc Derwen. I respond to the relevant objections to transport policy in my Chapter 8. I conclude that, with careful implementation of the development brief, the Parc Derwen housing scheme should not be unduly harmful to the environment of north-east Bridgend nor the historic village of Coity.

**Recommendation**

5.4.12 I recommend that there should be no modification.

**5.5 POLICY H1.34  
Location of Housing Development  
Picton Street, Nantyllyllon, Maesteg**

**Objection**

DO/50955/1042 Mr D Jones

**Issue**

5.5.1 This is whether or not the housing allocation should be made.

**Conclusions**

5.5.2 The objector argues that there is no realistic prospect of this site being developed within the Plan period, because it is located in an area where properties are difficult to sell and is located below the height of the adjoining road. However, the Council advises that outline planning permissions were granted for development of the site in 1989, and also in 1992 when the highway authority raised no objections to the proposed access arrangements. This is a long-standing housing allocation and, in preparing the UDP, the Council has reviewed all allocations and deleted those sites which are seriously constrained and therefore not capable of being developed by 2016. In these circumstances and having seen the site, I see no reason why it should not remain as a housing allocation in the UDP.

**Recommendation**

5.5.3 I recommend that no modification be made.

**5.6 POLICY H1.51  
Location of Housing Development  
West of Maesteg Road, Tondu**

**Objection**

DO/50880/939 Bridgend Biodiversity Partnership

## Issues

5.6.1 These are:

- Whether or not the allocation should be retained, given the site's nature conservation interest;
- Whether or not there should be a more specific definition of the site and the requirement for either a development brief and/or planning or highway obligations.

## Conclusions

5.6.2 On the first issue, Bridgend Biodiversity Partnership indicates that one end of this site is rich in orchids, and it is one of only two sites in the County Borough listed in the Local Biodiversity Action Plan for the scarce blue-tailed damselfly. Unless the interest for nature conservation can be protected by planning condition or obligation, the objectors argue that the allocation for housing should be removed.

5.6.3 The Council responds that the housing element of this regeneration site, to which Policy H1(51) refers, is a vital component in the housing land bank. However, it concedes that a strip of land in the south-west corner of the regeneration area overlaps with Parc Slip Nature Park, a designated SINC. The Council requests that the UDP should be modified to exclude this narrow strip of land from the regeneration area covered by Policy REG3(3). In view of the acknowledged nature conservation interest, I recommend a change to the wider regeneration site in my Chapter 17, section 17.4. The Council anticipates that employment and waste transfer uses will occupy the southern part of the site, rather than housing. If necessary, planning conditions and/or obligations could be attached to a planning permission for housing in this area to minimise any harm to nature conservation. I conclude that the housing allocation should not be removed from the Plan.

5.6.4 On the second issue, the objector suggests that the housing allocation should be shown separately from the rest of the REG3(3) site, and should be shown on the Proposals Map as occupying the northern portion of the site. Rhys-Davies Services Ltd express concern that the requirement for comprehensive development with neighbouring land could frustrate the release of their land. Following publication of the PIMS, the objection was conditionally withdrawn although it was not directly addressed by the modifications. The objector asserts that the northern part of site REG3(3) would be most suitable for housing and would have no functional link with other site uses.

5.6.5 I am aware that planning permissions have been granted for housing development on the north-eastern portion of the regeneration site. The Council envisages a combination of new employment, housing and recreational uses at Tondu, and seeks to locate a new waste transfer facility close to the rail link in the south. However, in the absence of detailed information as to the needs of each use and how they would best be combined on the site, I shall not recommend that the housing allocation is defined more precisely or separately on the Proposals Map. PPWales, paras 2.4.2 and 2.4.3 provide support for mixed use development and action areas for comprehensive treatment. The disposition of land uses and any phasing proposals could very properly be included in a development brief in my opinion.

5.6.6 I agree that planning obligations should only be made in accordance with the advice in WO Circular 13/97, and recommend changes accordingly to Policy H1 and para 4.4.11 of the UDP in my Chapter 4.

**Recommendation**

5.6.7 I recommend that no modification be made to Policy H1(51).

**5.7 POLICY H1.54  
Location of Housing Development  
Coychurch Road East, Brackla**

**Objection**  
DO/51054/1181 Clerical & Medical Group

**Issue**

5.7.1 This is whether or not the western boundary of the allocated site should be amended to include land adjacent to the Masonic Hall, currently allocated for a rail station and park and ride facility.

**Conclusions**

5.7.2 The objectors contend that the exclusion of the western parcel of land prejudices the viability of the site, and the ability to fund a new access and footbridge to Bridgend Industrial Estate. A more flexible arrangement is sought, with details covered by a development brief and partnership agreement.

5.7.3 The Council has put forward a revision to the Proposals Map in the PIMS, which shows all the land adjacent to the east of the Masonic Hall allocated for housing. A commitment to provide the rail station and park and ride facility is shown as a star within the H1 allocated land. I consider that this will enable the land to be developed for housing in the most effective way. Improved transport infrastructure will be obtained in accordance with a detailed development brief and, if appropriate, using planning or highways obligations. I conclude that the western boundary of the site should be modified as shown in the PIMS.

**Recommendation**

5.7.4 I recommend that the boundaries of this site be modified, as shown on the Proposals Map in the PIMS.

**5.8 POLICY H1.55  
Location of Housing Development  
Bridgend AFC Ground, Coychurch Road, Bridgend**

**Objections**  
DO/51173/1383 E Brown  
DO/51171/1380 Mr A Tingle

## Issue

5.8.1 This is whether or not the land should be allocated for housing, in view of the loss of the football ground and associated club facilities.

## Conclusions

5.8.2 The objectors argue that this allocation would deprive the local community of a valuable social and sporting asset. In addition to the playing facility, which is home to a senior Association Football Club, the clubhouse functions as a social and community centre for local groups. The long established facility is community owned and run, and charges reasonable rates for hire of the clubhouse. I consider that facilities such as these have very important community value, and I agree that it could be difficult to replace them, including the playing field, with equivalent facilities in a location which would be accessible to the local community.

5.8.3 The Council argues that the site is very well placed to provide additional housing land, since it would include previously developed land and be within a main settlement. It would be very accessible to existing employment and services within Bridgend. I consider that, if there were no conflict with the sporting and community facilities, the site would be highly suitable for new housing development as its location is consistent with the objectives for sustainable development. The Proposals Map of the UDP shows that the western portion of the playing field would be required to provide a highway improvement under Policy T16(4).

5.8.4 The objectors argue that allocating this site conflicts with other policies in the Plan, which seek to safeguard residential amenity and existing recreational facilities. The Council acknowledges that housing development on the site would only be permitted if criterion 1 of UDP Policy RC3 were met. This would require a developer to provide alternative facilities of equivalent community benefit. The Council advises that these should be in the vicinity and in place before any development could commence. I consider that, providing there is reasonable certainty that this requirement can be met in full, and that Policy T16(4) will be implemented, the housing allocation should remain.

## Recommendation

5.8.5 I recommend that no modification to the policy be made.

5.9 POLICY H1.56  
Location of Housing Development  
Marlas Farm/Heol Fach, North Cornelly

### Objections

DO/51153/1205

DO/50963/1053

Redrow Homes (South Wales) Ltd

Mr F L Smith

## Issues

5.9.1 These are:

- Whether or not the Proposals Map accurately reflects the boundaries of the area that can be developed for housing;

- Whether or not the site is suitable for housing development, given the local topography and character of Marlas Bridge.

## Conclusions

5.9.2 On the first issue, Redrow Homes expresses support in principle for the allocation and indicates that the company has substantial control over much of the site. However, there are two pockets of land on the eastern side where Redrow wishes to see changes to reflect its control more accurately. The Council responds that any appropriate minor changes will be made in subsequent changes of the UDP process. I conclude that such changes should be made.

5.9.3 On the second issue, Mr Smith argues that the changes in contour on the site and the drainage make the site unsuitable for housing. It should be left to provide a rural outlook on the western approach to North Cornelly. However, I consider that the site has been identified and assessed as suitable for housing following a careful process as outlined in Chapter 4 of the UDP. Moreover, Redrow Homes, an experienced house builder, has shown considerable interest in the site. As the Council points out, development will not begin until a development brief and / or planning and / or highway obligations have been agreed. I would expect the development brief to take account of the topography of the site and the visual impact of new development on the approach to North Cornelly along the B4283.

5.9.4 Regarding highway matters and the limited capacity of Marlas Bridge, the evidence to the UDP Inquiry from Redrow Homes suggests that: '...the development could .... release funds for the resolution of the already existing Marlas Bridge problem.' This indicates to me that the capacity of the bridge is being examined and could be increased if it were required to serve the new development. I conclude that the site is suitable for housing development, and that potential difficulties with it could be overcome through the process of requiring a development brief and/or planning and highways obligations.

## Recommendation

5.9.5 I recommend that the Proposals Map be modified on the eastern boundary of this allocation in accordance with the plan submitted by Redrow Homes (South Wales) Ltd.

### 5.10 POLICY H1.58 Location of Housing Development Porthcawl Regeneration Scheme

#### Objections

DO/51123/1279

Mrs P M Jenkins

DO/50873/924

Porthcawl Civic Trust

DO/50783/1302

Porthcawl Town Council

## Issues

5.10.1 These are :

- Whether or not the Plan should provide for an additional 300 dwellings as part of the regeneration scheme;

- Whether or not the Plan should be more precise about the location of new housing, ensuring that it does not conflict with the best use of land to promote tourism.

## Conclusions

5.10.2 On the first issue, the Town Council states that it does not support the requirement in the Plan for an additional 300 houses. Mrs Jenkins argues that, unless the new dwellings are for retired persons, the town could not generate sufficient employment for the new working population. However, the Council has forecast the future requirement of the County Borough for new housing as a whole, and has allocated sites for new housing development, concentrating on (a) earlier commitments which are likely to succeed and (b) brownfield sites in main settlements, which include Porthcawl. I have concluded that the Council has made an appropriate forecast and has allocated a sufficiency of land to meet that requirement (my Chapter 4). Though the allocation for 300 dwellings within the regeneration area is sizeable, I consider that it and the other allocations for Porthcawl would result in a proportionate increase in dwellings over the Plan period.

5.10.3 I agree with the Council that the provision of additional dwellings on this site, which contains brownfield land and lies within the town's boundaries, would be in accordance with national planning policy. I consider that the provision of some 300 new dwellings within the wider regeneration area would leave a very significant amount of land available for revitalisation of the tourism and leisure industry.

5.10.4 Objectors argue that the proposed additional dwellings are unlikely to benefit, and could adversely affect, Porthcawl. They could undermine the regeneration strategy by offering an easier option than the more challenging task of promoting development for tourism purposes. The Civic Trust expresses concern that the figure of 300 dwellings could be substantially exceeded if the provision of tourism apartments or holiday accommodation goes ahead, as recently proposed by a potential developer. It would be difficult to ensure that new accommodation was used solely by visitors.

5.10.5 Care will need to be exercised to ensure that any holiday accommodation will be reserved for tourists and other visitors, but this is a matter to be addressed as the details of the regeneration strategy are worked out. At the Housing Round Table session of the Inquiry, the Council argued vigorously against objectors who sought the provision of additional sites for general needs housing in the County Borough. I have no evidence that it is pursuing a different approach in relation to Porthcawl. In my view the inclusion of housing among the acceptable land uses for the regeneration site accords with advice in PPWales, para 2.4.2, that an effective way to achieve regeneration is to foster integrated communities within the existing settlement pattern, by promoting mixed use development. I conclude that the allocation of 300 dwellings on the regeneration site to meet general housing needs is appropriate.

5.10.6 On the second issue, the Civic Trust argues that the H1(58) allocation should not include the Salt Lake, Harbour or Cosy Corner area, as housing development here would conflict with enhancement of the area as a tourist resort. Policy REG3(2) of the UDP is clear that the revitalisation of tourism and leisure activities should drive the regeneration of this area, so that I would expect those parts of the site which are most attractive or suitable for tourism uses to be set aside or developed for those purposes. The Council also indicates that the disposition of particular uses on the site will be decided by way of a development brief. This will provide the opportunity for detailed assessment of the needs of all the components of redevelopment, and will be the subject of public consultation leading to its adoption as SPG.

5.10.7 I consider that this is a sensible approach to planning the area, offering some flexibility to the developer and ensuring that the development potential of the whole area is optimised. The UDP includes a number of policies to promote good design and protect the environment of the County Borough including the coast from undesirable development. They would be applied to any firm proposals for this area. Taking account of all these factors, I see no reason to designate the precise location of new housing under Policy H1(58) in the UDP.

**Recommendation**

5.10.8 I recommend that no modification be made.

**5.11 POLICY H1.59  
Location of Housing Development  
North of Locks Lane, Porthcawl**

**Objections**

DO/50873/925	Porthcawl Civic Trust Society
DO/50783/1303	Porthcawl Town Council
DO/51066/1202	Ms B J Power
DO/51064/1200	Mr K C Power
DO/51065/1201	Ms L A Power
DO/50861/890	Mr D Richards
DO/51153/1197	Redrow Homes (South Wales) Ltd
DO/51146/1321	Mr J Roberts

**Issues**

5.11.1 These are:

- Whether or not the land should be allocated wholly for recreational uses;
- If part of the site is allocated for housing development, whether or not the appropriate balance between housing and open space provision on the site has been struck;
- If part of the site is allocated for housing development, whether or not the deposit UDP accurately reflects the housing capacity of the site and gives reasonable guidance on development briefs and planning/highway agreements.

**Conclusions**

5.11.2 On the first issue, the objection site has been allocated for recreational purposes in previous plans for many years, to meet a deficit in playing fields in Porthcawl. Para 7.2.1 of PPWales encourages planning authorities to review existing allocations which cannot realistically be taken up in the lifetime of the Plan, and consider whether mixed use, housing or no development would be more appropriate. The Council recognises that there is still a deficiency in recreational provision within Porthcawl, but acknowledges a continuing inability to fund from public resources the purchase and development of the site for recreational purposes. Cllr Richards points out that lottery grants are now available for funding sports' facilities, but I am aware that stringent eligibility criteria have to be met and not all schemes put forward for support are successful. The Council has reached an agreement in principle with Redrow Homes

that the site should be re-allocated for both recreational and housing purposes. I agree that the Council's new approach is consistent with the advice in PPWales.

5.11.3 The Town Council refers to the scope for a 'green wedge' providing relief from continuous housing along the sea front, and a natural break between Rest Bay/Nottage and the town centre. Lock's Common occupies an extensive area of undeveloped land between the sea and the built up area of Porthcawl due west of the objection site. To the east is the existing recreational land, so that I find no shortage of informal open space in this part of the town.

5.11.4 Porthcawl Civic Trust argues that insufficient weight is given to the value of the land for agriculture. The Trust does not oppose use of the land for recreation, as it would remain available in the longer term for agriculture. I accept that considerable weight should be given in the UDP to protecting the best and most versatile land, and land which is actively farmed. However, in this case, the site is situated well within an established urban area. I consider that its potential to meet acknowledged requirements for new housing land and recreational facilities should override its value to agriculture. I conclude that the site should contribute to the enhancement of the town's recreational facilities, but need not remain entirely undeveloped.

5.11.5 On the second issue, the Council's Planning and Parks Departments seek the provision of two playing field pitches, a children's play area and improvements to changing facilities. Applying National Playing Fields Association (NPFA) standards, the Council calculates that some 3.01ha would be required for recreational purposes, leaving 2.28ha for housing. Accordingly, the deposit UDP Proposals Map reflects such a split and Policy H1 shows an allocation of 12 dwellings for the site. This would give a very low density of development, but the Council argues that design and layout should reflect the low housing densities of neighbouring areas.

5.11.6 Redrow Homes (South Wales) Ltd contends that a lesser amount of land is required for the above recreational uses, and more than 12 dwellings could be accommodated on the site without compromising the quality of the area. Moreover, in order to be commercially viable, it is asserted that some 30-35 dwellings need to be provided on the site. Redrow brought a layout plan to the Inquiry (Drawing No 3124-03 dated 14 5 2002) which showed housing to the west of the existing, informal footpath across the site and public open space to the east. This illustrates a greater area for housing than the Proposals Map in the UDP.

5.11.7 The drawing shows that about 2.7ha would be available for recreational purposes. This would exceed the minimum requirement for two playing fields, applying the NPFA standards, and I agree that additional children's play space could be accommodated either as an extension to the existing one at the eastern end of the recreation area or close to the pavilion. I consider that the reduced area for playing fields' provision would be satisfactory and provide significant community benefit. In addition, the proposed layout would have the merit of retaining the informal footpath between the two uses.

5.11.8 The submitted drawing also illustrates how some 38 detached dwellings could be accommodated on the western portion of the site. This would include five well-spaced dwellings set back from the western boundary, along a similar building line to existing development to the north and south. Most of the objectors argue that the site is so sensitive that it should not be allocated for any housing development. I consider that the site has limited scenic value in its own right, but is sensitive because it is located next to the Coastal Zone and Lock's Common which lies within Rest Bay Landscape Conservation Area. I consider that a layout along the lines of the Redrow drawing, with substantial and spacious buildings along the

front, would echo the surrounding layout and density of housing development and would respect the sensitive, adjacent coastal strip.

5.11.9 Concerning the remainder of the housing site behind the western frontage, in my opinion, the aim should be to maximise the use of this urban land in a main settlement by raising the density of development, commensurate with safeguarding the privacy and outlook of neighbours, and achieving a high quality of design. Objectors raise concerns about the effect on highway and pedestrian safety on Lock's Lane, but if the development were accessed from Sanderling Road, conditions for road users would remain satisfactory in my view. No substantive evidence has been brought forward to contradict the Council's advice that the site is of limited value for biodiversity.

5.11.10 I conclude that the western portion of the site could reasonably accommodate in the order of 40 units without serious harm to the living conditions of neighbours, biodiversity or the character and appearance of the surrounding area. The Town Council and others question the need for additional housing on this site, but I am satisfied that a modest increase in the number of dwellings would not upset the overall balance between demand and supply over the Plan period and could be beneficial. I shall recommend that Policy H1 is changed to refer to 40 dwellings rather than 12.

5.11.11 Turning to the third issue, Redrow and the Council agreed at the Inquiry that a development brief might not be necessary if a highly detailed planning application were submitted. Neighbour notification and advertisement would enable interested parties to comment on detailed proposals for the site. I consider that the suitability or otherwise of development in excess of two storeys on this site is too detailed a matter for the UDP and should be assessed when a firm proposal is put forward.

5.11.12 A S106 planning obligation could be considered to ensure that the recreational facilities were provided as well as housing. However, the tests for the use of planning obligations would require the recreational facilities to be directly related to the development, whereas in this case, they would be sought to serve the wider area and meet existing deficiencies. PPWales para 2.5.5 indicates that UDPs should encourage a mix of uses in town centres and other appropriate places. At the Inquiry, the Council and Redrow accepted that a mixed use allocation would be appropriate in this case, to secure the provision of the recreational facilities. I shall recommend that a mixed use allocation be made in respect of this land, together with some explanatory text and changes to the Proposals Map.

5.11.13 The Civic Trust advises that the disused site at 'Stoneleigh' could be used instead of the objection site for additional housing. The Council points out that a specific proposal for development there, if submitted, would be considered on its merits under Policy H3, as an infill site within the urban area. In my view, the site at 'Stoneleigh' is not relevant to future planning of the Lock's Lane site.

## Recommendation

5.11.14 I recommend that Policy H1(59) should be modified to read: 'North of Locks Lane, Porthcawl - 40 (Estimated No of Dwellings)'.

5.11.15 I recommend that either the footnote below Policy H1 or the reasoned justification should be extended with text along the following lines:

'For H1(59), housing will be provided as part of a mixed use development only. In addition to new housing, at least 2.7ha of land is to be developed for recreational purposes at the eastern end of the site.'

5.11.16 I recommend that the Proposals Map be modified to show the site north of Locks Lane as a 'mixed use development' site for housing and recreation purposes.

## 5.12 POLICY H1.67 Location of Housing Development Porthcawl Road, North Cornelly

### **Objection**

DO/50325/349 Ms M Butcher

### Issue

5.12.1 This is whether or not the site should be allocated for housing.

### Conclusions

5.12.2 The objector argues that the site should not be allocated for housing, as there are existing, empty houses on Marlas Estate, and the housing allocation at Marlas Farm site is capable of providing more than enough houses to serve North Cornelly. The objection site, it is argued, was purchased for leisure use originally, and would be more suitable for the purpose than the steeply sloping land at Heol Maendy/Heol Fach, which has been identified in the Plan for recreational use.

5.12.3 At my site visit, I saw that the land adjacent to School Terrace and Porthcawl Road is being built on. The Council advises that, when outline planning permission was granted, there was an agreement that a percentage of the proceeds from sale of the land should be re-invested locally in recreational and leisure provision.

5.12.4 The matter of the adequacy of future housing provision is covered in my Chapter 4. The Council has assessed the future requirement of the County Borough as a whole. I agree with the Council's approach and am satisfied that the Porthcawl Road site is appropriately allocated for housing, in order to contribute to meeting current and future requirements.

### Recommendation

5.12.5 I recommend that no modification be made.

## 5.13 POLICY H3 Windfall and Small-Scale Housing in Main Settlements

### **Objections**

DO/51204/1563 Mr & Mrs James  
DO/51193/1465 JST Developments

*Conditionally Withdrawn*

DO/51229/1850

National Assembly for Wales

DO/51209/1653

Countryside Council for Wales

check CWD with MB

## Issues

5.13.1 These are:

- Whether or not the Plan contains sufficient information as to how the settlements have been classified into main and/or smaller settlements;
- Whether or not the 'logical' boundaries are those defined on the Proposals Map.

## Conclusions

5.13.2 In response to the NAW's objection as to how main and smaller settlements are to be defined, the Council has proposed additional text in the PIMS. I consider that the proposed additional text, paras 4.6.2 to 4.6.4, would clarify the classification. I have taken account of the conditional withdrawal of the objection.

5.13.3 I have commented on 'logical' boundaries to main settlements in the Environment Chapter, section 3.3. As currently drafted, the Proposals Map shows no boundaries for main settlements. This objection by the CCW has been withdrawn following publication of the PIMS.

5.13.4 Mr and Mrs James argue that land on the south side of Ogmores Vale would meet the criteria for a windfall site under Policy H3. JST Developments argue that a site at Nantymoel would meet the criteria of para 4.6.4 of the UDP. I make recommendations on these representation sites in Chapter 6. Neither objector makes specific in principle objections to Policy H3, which is not intended to identify specific sites nor name them in the Plan. I shall not recommend changes to the policy on the basis of these objections.

## Recommendation

5.13.5 I recommend that no change be made to Policy H3.

5.13.6 I recommend that the amendment shown as paras 4.6.2 to 4.6.4 in the PIMS be made.

## 5.14

### POLICY H4

#### Small-Scale Housing in Smaller Settlements

#### Objections

DO/51006/1139

C H Knight & Partners

DO/51046/1161

Messrs Herbert R Thomas

DO/51204/1564

Mr & Mrs James

DO/51047/1165

Mr & Mrs W D Jenkins

DO/50981/1071

Mr & Mrs D L Thomas

DO/51207/1576

Messrs M J & E D H Thomas & Other Land Owners

*Conditionally Withdrawn*

DO/51229/1851

National Assembly for Wales

## Issues

5.14.1 These are :

- whether or not the policy should be modified to permit housing development outside the boundaries of the following settlements: Coity, Blackmill, South Cornelly, Ogmores Vale;
- Whether or not the Plan contains sufficient information as to how the settlements have been classified into main and/or smaller settlements;
- Whether or not small hamlets should be given settlement boundaries and/or the status of Tythegston should be clarified.

## Conclusions

### The first issue

5.14.2 A number of objectors argue that there is no scope for small scale infilling or rounding off within the defined boundaries of specified smaller settlements, and the policy should permit development beyond their current limits, or amend boundaries so as to include additional sites. However, I consider that the policy is intended to be permissive rather than prescriptive, meaning that development *could* take place within these settlements, not *should*. Smaller settlements generally offer some basic services, but their residents depend for many higher order facilities such as secondary education, health, shopping and employment on the main settlements. In the interests of sustainable development and reducing the need to travel, I consider that the bulk of new developments should take place in main settlements. Providing the future requirements of the area can be met there, I consider that it is appropriate to restrict new housing development in smaller settlements as envisaged in Policy H4. This is explained clearly in the Council's preferred land use strategy.

### Coity

5.14.3 Mr and Mrs Thomas seek an amendment to the boundary of Coity at Croesty Farm. They also seek a rewording of Policy H4 to delete the phrase 'up to and within', which would allow housing development within settlements or rounding off beyond settlement boundaries. The objectors argue that this would give a more flexible framework, broadening the choice and location of housing.

5.14.4 Alternatively, it is suggested that the phrase 'limited rounding off' confuses the issue and should be omitted. I consider that the wording of this policy is clear. Bearing in mind the Council's preferred land use strategy favouring development in main settlements and on previously developed land, I see no reason to change this policy so that it would permit housing development beyond the defined settlement boundary of Coity.

### Blackmill

5.14.5 The objectors argue that land south of the property known as Cwmdare beside the A4061 should be included in the settlement boundary, enabling it to be available for housing development. The Council advises that applications for residential development have been refused in the past on this site, and that the site lies adjacent to woodland which is a SSSI and candidate Special Area of Conservation. The PIMS shows that the SSSI runs close to the full length of the eastern boundary of the objection site.

5.14.6 National planning policy is that development likely to affect a SSSI will be subject to special scrutiny, and designated areas will be protected from damage and deterioration. Though the objectors contend that there is a strip of land between the objection site and the protected area which could provide a buffer, TAN(W) 5: Nature Conservation and Planning (CD38) indicates that SSSIs may be seriously damaged by development outside their boundaries. TAN(W) 5 also indicates that, where developers are uncertain as to the effects of a proposal on a SSSI, they should seek an opinion from the CCW. In the absence of evidence from the CCW, and in view of the site's proximity to a nationally (and possibly European) important site, I consider that a precautionary stance is appropriate in defining the settlement boundary.

5.14.7 I consider that the settlement boundary is reasonably drawn in relation to existing features in the vicinity of the objection site. Unusually among smaller settlements, Blackmill includes site H1(39) Cwm Ogwr Fach, an allocation for new housing development offering scope for expansion of the settlement. I conclude that neither Policy H4 nor the settlement boundary should be modified as suggested by the objectors on this site.

### **South Cornelly**

5.14.8 In Chapter 6, I deal with the objectors' case for a new housing allocation on land beyond the settlement boundary, and in Chapter 3 with the appropriateness of the settlement boundary. For reasons given there, I conclude that a new housing allocation under Policy H1 should not be made. I am satisfied that the settlement boundary for this smaller settlement should not be changed. In my view, the proposed provision of 80 new dwellings at South Cornelly with associated open space and community facilities could not reasonably be regarded as small scale infilling or rounding off, even if the settlement boundary were moved.

### **Ogmore Vale**

5.14.9 This is a main settlement and does not therefore have a designated settlement boundary. Any proposals for infilling or rounding off would be considered under Policy H3 rather than H4. The objection to Policy H1 by Mr and Mrs James is considered in my Chapter 6, where I conclude that no modification to the Plan is required.

### **Definition of smaller settlements**

5.14.10 In response to the NAW's objection as to how main and smaller settlements are to be defined, the Council has proposed additional text in the PIMS. I consider that the proposed additional text, paras 4.6.2 to 4.6.4, would clarify the classification.

### **Fountain, Tythegston and settlement boundaries**

5.14.11 Mr and Mrs Jenkins argue that all hamlets such as Fountain should be given settlement boundaries. However, I consider that housing development in these very small settlements should be strictly controlled in accordance with Policy EV1, as they constitute part of the countryside and do not possess the necessary community facilities, utility services and employment opportunities to qualify as smaller settlements.

5.14.12 I agree with C H Knight and Partners that it is inconsistent to highlight 'development in Tythegston' in Policy EV14 and refer to the 'erection of new dwellings' in para 3.6.11, if Tythegston does not have the status of a smaller settlement. However, I am satisfied that Tythegston does not possess the basic range of facilities available in the smaller settlements listed in Policy H4. I respond to the objections in respect of Policy EV14 and other

Environment policies made by C H Knight and Partners in my Chapter 3. I consider that para 4.7.6 of the UDP should not highlight Tythegston as an exception to the policies governing development in the countryside. I conclude that it is unnecessary to define settlement boundaries for the hamlets of Fountain or Tythegston.

**Recommendation**

5.14.13 I recommend that no modification be made.

**5.15 POLICY H6  
Housing Choice**

**Objection**  
DO/51227/1788 Harmer Partnership

**Issue**

5.15.1 This is whether or not the policy is appropriately flexible.

**Conclusions**

5.15.2 The objectors argue that the policy is unreasonably flexible and should be reworded. They have not explained why they perceive the policy to be inflexible, but it seems reasonable to infer that they believe there to be residential areas characterised by high standards of privacy and spaciousness where development could be permitted. I address this proposition below.

5.15.3 National planning policy and policies in the UDP (notably Policy EV49 as proposed for modification in the PIMS) should ensure that development is limited to that which meets high standards of design and respects the character of its surroundings. Areas which should be preserved or enhanced because of their architectural or historic interest have conservation area status, and would be protected from harmful development by policies in section 3.14 of the UDP. I consider that these policies, along with Policy RC3 of the UDP, should safeguard important areas of private and public open space in the County Borough. It is also evident to me that privacy and spaciousness are likely to be valued by the majority of owners and occupiers whose dwellings and land possess these benefits. I would expect proposals to remove these qualities, which have amenity and financial value, to be relatively few. These factors incline me to the view that this policy may be superfluous.

5.15.4 The Council argues that the policy is in accordance with PPWales and quotes from a number of paragraphs. On providing greater housing choice, the UDP puts forward a large number and variety of new housing sites on which a range of types and sizes of dwellings are likely to be built. In my opinion, a relaxation of Policy H6 might provide the opportunity for some additional housing as infilling in established low density areas, and enhance the choice for those in the housing market.

5.15.5 I agree that PPWales para 9.3.4 is pertinent to this objection. However, it is not opposed in principle to raising housing densities and points out the importance to sustainability of increased densities, as they 'help to conserve land resources'. Moreover, rather than seeking to resist increases in density, PPWales goes on to state 'good design can overcome adverse effects [of increases in density]'. Though the Council argues that a similar policy to H6 was

included in the Ogwr Borough Local Plan and has stood the test of S78 planning appeals, I consider that there have been significant changes in national planning policy on sustainable development, housing densities and design which support a fundamental review of this policy at this time. Though the title of this policy has changed since the Council's Sustainability Appraisal was carried out, nevertheless its content which was criticised by the authors remains the same.

5.15.6 The Council, in its response to the Harmer Partnership, signals its support for amendments to para 4.9.7 of the UDP, to clarify that Policy H6 would be accorded greater weight, if there were a conflict with either Policy H3 or H4. In my opinion, such an amendment could weaken the preferred land use strategy and conflict with the aim of conserving urban land resources.

5.15.7 Overall, I conclude that the policy is unreasonably inflexible. However, I consider that adding 'unacceptable' to the policy wording, as proposed by the objectors, would be in conflict with the Council's approach to policy writing as outlined in CD147, and would not overcome the difficulties which I have outlined. In my view, the policy should be omitted from the Plan.

**Recommendation**

5.15.8 I recommend that Policy H6 be deleted from the UDP.

5.15.9 I also recommend that the supporting text in paras 4.9.4, 4.9.5 and 4.9.7 be deleted.

**5.16 POLICY OMISSION  
New Housing for Senior Management**

**Objection**  
DO/51227/1790 Harmer Partnership

**Issue**

5.16.1 This is whether or not a new policy to allow housing for 'senior management' should be added to the UDP.

**Conclusions**

5.16.2 The objectors seek a new policy along the lines of Policy H13 in the Ogwr Borough Local Plan. The objectors do not explain who would be categorised as 'senior management', nor why they should be treated separately in the UDP. The Council advises that Policy H13 of the Local Plan was included in response to national planning guidance which has been superseded. I consider that the deposit UDP allocates many new housing sites which will be capable of providing a wide range and choice of dwellings. In my view, staff in senior management positions would be well placed to compete in the general needs housing market in Bridgend, and would not require special treatment. I conclude that a new policy as proposed would be unnecessary.

**Recommendation**

5.16.3 I recommend that no modification be made.

**Objections**

DO/51201/1527	Bellway Homes (Estates) Ltd
DO/51227/1789	Harmer Partnership
DO/51203/1554	House Builders Federation
DO/51229/1854	National Assembly for Wales
DO/50783/1305	Porthcawl Town Council
DO/51207/1575	Messrs M J & E D Thomas & Other Land Owners
DO/51222/1742	Westbury Homes (Holdings) Ltd
DO/51157/1353	Wilcon Homes Limited

*Conditionally Withdrawn*

*DO/51229/1853      National Assembly for Wales*

**Issues**

5.17.1      These are:

- Whether or not the policy should 'expect' an appropriate element of affordable housing, in the light of national planning policy and advice;
- Whether or not the policy should be included in the Plan, in the absence of a local housing need assessment;
- Whether or not there should be a size threshold for housing developments to which the policy should be applied;
- Whether or not the policy makes clear what arrangements will be used to ensure that affordable housing remains reserved for those in need;
- Whether or not the policy makes adequate provision for affordable housing in rural areas;
- Whether or not the Plan should identify areas reserved for low cost or social housing;
- Whether or not criteria 2 and 3 should be included in the policy.

**Conclusions****'Expect' or 'seek to negotiate'**

5.17.2      Objectors argue that the expression 'will expect' suggests a requirement for developers to provide affordable housing. The latter would commonly be achieved by a planning obligation, and WO C13/97: Planning Obligations is clear that that these cannot be required from developers but have to be negotiated. The Council is understandably anxious to avoid a weak policy, and it has put forward a change in the PIMS to include a reference to planning conditions. I consider that this would be an improvement, as planning conditions as well as obligations, may be used to secure affordable housing schemes for occupancy by persons in need. As the policy refers to an 'appropriate element' of affordable housing and 'suitable sites', I am satisfied that it would offer scope for negotiation in individual cases, in accordance with national policy for affordable housing and C13/97.

## **Housing need**

5.17.3 On the second issue, the HBF argues that the Council should demonstrate a need exists, if it is to include this policy in its Plan. It is not acceptable for the Council to suggest that it cannot afford an assessment or study. The Council informs that a Housing Need Assessment for the County Borough has been commissioned, and a Draft Local Housing Strategy based on it will be published by April 2003. I agree that an affordable housing policy should only be included if there is a demonstrable housing need which cannot be met by the general housing market. I consider that it is wholly inadequate to rely on local knowledge, as suggested in para 4.10.6 of the UDP, as this may be anecdotal and piecemeal.

5.17.4 The Housing Strategy and Operational Plan 2000/2001 confirms the existence of a Housing Register, homelessness and social deprivation in the form of high 'Z' scores in the County Borough. Chapter 5 of the UDP refers to 'complex and deep seated economic and social problems' within the County Borough, and to Objective 1 status. From this evidence, I would expect a need for affordable housing to exist in some if not all parts of the County Borough. Assuming that needs can be confirmed, and the findings from the assessment will be available shortly, I consider that the UDP should include relevant policy on affordable housing. The Council should be in a position to confirm that the policy is required before the Plan is adopted.

5.17.5 In my opinion, para 4.10.6 of the UDP should be updated in the light of the results from the Housing Need Assessment. A summary of the quantity and distribution of need levels should be given in the UDP as guidance to potential developers. Unless the Assessment indicates no housing need, I conclude that this policy should be included in the Plan.

## **Size Threshold**

5.17.6 A number of objectors argue that there should be a minimum site size, below which developers should not be expected to provide affordable housing. The Council replies that it needs to retain flexibility as housing needs may change over the Plan period. It refers to PPWales, which indicates that uniform quotas should not be imposed on development regardless of market or site conditions. However, it seems to me that a minimum size of site could be identified, below which affordable housing would not be sought, without a uniform quota being applied to eligible sites. I consider that a minimum threshold for affordable housing provision would be helpful, as it may not be viable to provide affordable housing on the smallest sites. The HBF refers to a threshold of 25 dwellings used in England, and other objectors suggest 40 dwellings.

5.17.7 I agree with the HBF that small developments permitted under Policy H4 of the UDP are unlikely to be capable of providing affordable housing. As currently worded, the Policy applies to suitable sites permitted in accordance with Policies H1, H3 or H4. However, it is conceivable that housing development may be permitted in the Plan period which is not in accordance with these policies. For example, housing development may be allowed on appeal on land allocated for other purposes or in the countryside. It would be desirable to re-word the policy in my opinion, to ensure that all housing development above a certain size, in areas where a local need can be demonstrated, is considered for the provision of affordable development.

5.17.8 Objectors point to the advice in TAN Wales 2 (CD72), on targets and numbers, that it is important to take into account site suitability, the economics of provision and other material considerations, as well as a site's size. Clearly, each site will be different and market conditions as well as site characteristics would influence the negotiations and outcome in terms of housing numbers. However, I see no need to explain this in full in the policy, as long as it allows for a process of negotiation. I conclude that there should be a site size threshold below

which affordable development would not be sought. I consider that the level should be set when the findings of the Housing Need Assessment are known, and in the light of good, local information from house builders and registered social landlords about the economics of site development.

### **Arrangements to secure affordable housing for those in need**

5.17.9 The NAW argues that the policy and reasoned justification do not explain the arrangements which would be in place to ensure that affordable housing remains reserved for those in need. The Council proposes in the PIMS that para 4.10.6 should be modified to give additional information about the mechanisms for securing and retaining affordable housing. The NAW has conditionally withdrawn its objection on the basis that these modifications are made, and I am satisfied that they comply with TAN (Wales) 2 (CD72) and would overcome a potential weakness in the policy.

### **Affordable housing in rural areas**

5.17.10 On the fifth issue, objection is made to para 4.10.7 and the notion that 'rural exception sites' for affordable housing may be permitted within the designated boundaries of smaller settlements. Objectors point out that 'rural exception sites' cater for development on land where planning permission would not usually be granted, including sites adjacent to villages and beyond settlement boundaries. The Council considers that there will be sufficient scope for affordable housing in the main and smaller settlements throughout the Plan period. Furthermore, it argues that the prevailing settlement pattern means that all parts of the County Borough lie within 4 or 5 miles of an urban area. I find it difficult to reach a decision on this point without knowing the results of the Housing Need Assessment. There may be no need for the Plan to make allowance for 'rural exception sites', but if there are parts of the County Borough with substantial need and a shortage of allocated and easy to develop sites, then an allowance for rural exceptions may be appropriate.

5.17.11 The Council has submitted a revised paragraph 4.10.7 which removes the reference to 'rural exceptions'. I consider that it should review its approach in the light of the emerging information on need, and then look at this paragraph again.

### **Named areas**

5.17.12 Porthcawl Town Council argues that more detail is required and that areas reserved for affordable housing should be named in the Plan. The Council argues that needs may change over the Plan period and it is desirable to retain some flexibility over provision. Nevertheless, I consider that the UDP should name the parts of the County Borough where there are existing high levels of need, when this is known, and provide an indication to developers as to the level of affordable housing provision which the Council will be seeking.

### **Criteria 2 and 3**

5.17.13 Objectors claim that these criteria in the policy are unnecessary as they repeat other policies in the Plan. The Council replies that it seeks to ensure that there is no lowering of standards for affordable housing developments. I consider that these criteria are unnecessary, especially in the light of the PIMS proposal for a new para 1.1.8. This informs that, in taking development control decisions, a proposal will be assessed against all relevant policies. I conclude that criteria 2 & 3 should be deleted.

## Recommendation

5.17.14 In the event that the Housing Need Assessment fails to identify local housing need, I recommend that Policy H7 should be deleted.

5.17.15 Otherwise, I recommend that Policy H7 should be modified as shown in the PIMS.

5.17.16 I recommend that criteria 2 & 3 in the policy should be deleted.

5.17.17 I recommend that the policy be further modified to read: '..... to be provided on suitable sites capable of accommodating \*\* or more units or exceeding \*\* hectares in size. Such affordable housing will ....'

5.17.18 I recommend that para 4.10.6 should be modified as shown in the PIMS.

5.17.19 In addition, I recommend that para 4.10.6 should be further modified to reflect the results of the Council's Housing Need Assessment.

5.17.20 I recommend that para 4.10.7 should be modified along the lines of the text given in the Council's response to the Harmer Partnership (objection ref. No. DO/51227/1789) and the National Assembly for Wales (DO/51229/1854).

5.17.21 I recommend that para 4.10.7 should be further modified, if the results of the Council's Housing Need Assessment indicate that rural exceptions sites may be justified to meet identified needs.

