

8. Transportation

8.1 POLICY T1 The Promotion of Sustainable Modes of Transport

Objections

DO/51209/1659	Countryside Council for Wales
DO/51227/1795	Harmer Partnership
DO/51203/1556	House Builders Federation
DO/51161/1364	Wm Morrison Supermarkets Plc

Conditionally Withdrawn

DO/51229/1861	National Assembly for Wales
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Issues

8.1.1 These are:

- Whether or not the policy is helpful and realistic, in its current form;
- Whether or not the policy should be expanded to deal with development likely to be a major traffic generator, or with Green Transport Plans;
- Whether or not the reasoned justification should recognise that longer journeys may combine travel modes and include walking and cycling.

Conclusions

8.1.2 On the first issue, the Harmer Partnership describes the policy as unhelpful and unrealistic, and covering matters which are dealt with by other policies in the UDP. The HBF claims that the policy is too imprecise and would be more appropriate as an objective to the Plan. The Council replies that it is concerned about the impact of all development on the transportation system and the environment. It also seeks to integrate land use and transport policy to achieve sustainable development. Policy T1 is intended as an umbrella policy. Though I consider its aims to be sound, I am concerned that it duplicates Part I policies and the introductory statements about sustainable development in the UDP. Moreover, I agree with the objectors that it lacks precision and clarity, as the concepts of 'most sustainable' and 'environmentally acceptable' locations would often be debatable.

8.1.3 The policy is worded in accordance with the principles highlighted in the Council's General Proof 1 (CD147), but it is a negative policy. The HBF proposes a revised policy which would be positively worded and deal adequately, in my view, with the requirement for new development to be accessible by modes of transport other than the private car. Policy T1 also refers to environmental acceptability, and I shall recommend a new policy wording which covers this aspect too.

8.1.4 On the second issue, the CCW wishes the policy to offer more guidance to developments which would be major traffic generators. However, I consider that this opening policy in the transportation chapter should set down principles which would be applicable to all development proposals. Wm Morrison Supermarkets Plc argues that reference should be made

to Green Transport Plans, but I agree with the Council that their role is covered adequately in the earlier part of the chapter including the justification of the Part 1 policies.

8.1.5 Turning to the third issue, the NAW objects to the wording of para 6.3.7, which overlooks the possibility that longer journeys could include an element of walking or cycling. The Council has proposed an amendment in the PIMS, to expand the text giving recognition to the fact that journeys could be multi-modal and that measures to cater for cycling combined with public transport use will be encouraged. The NAW has conditionally withdrawn its objection subject to the PIMS amendment. I consider that the proposed modification meets the objection and adds helpful information to the UDP.

Recommendation

8.1.6 I recommend that Policy T1 be modified to read: ‘Development should locate in areas served by, or capable of being served by, modes of transport other than the private car. Development should select locations which result in the minimal harmful impact from traffic, by way of noise, pollution etc, on the environment.’

8.1.7 I recommend that para 6.3.7 be modified as shown in the PIMS.

**8.2 POLICY T2
Sustainable Improvements to Existing Highways**

Objections

DO/51227/1796	Harmer Partnership
DO/51203/1557	House Builders Federation
DO/50017/15	Rhys-Davies Services Ltd

Issues

8.2.1 These are:

- Whether or not the policy should take account of the size and nature of the proposal in connection with which highway improvements are sought;
- Whether or not the supporting text reflects the Government's advice on planning conditions and obligations, and on S278 agreements of the Highways Act 1980.

Conclusions

8.2.2 On the first issue, objectors argue that Policy T2 would not be applicable in all cases, and that the link between the scale and nature of a proposal and the need for highway improvements should be clear. The Council relies on the last sentence in para 6.3.11, to explain that the policy would not always be applicable. The Council advises that the need for measures to improve the highway will be identified from Transport Assessments, which PPWales promotes in connection with ‘major’ or ‘large scale’ developments.

8.2.3 In my view, even the most minor development should be compatible with road safety and should provide access for pedestrians and cyclists. However, Policy EV49 and para 3.17.15, as proposed for amendment in the PIMS, adequately deal with the transport implication of such development proposals. Most of the facilities and features listed in Policy T2

would rarely be justified to support a small scale development. I consider that the policy should make this clear.

8.2.4 An underlying difficulty with Policy T2 is that it relates to new transportation infrastructure which may or may not be needed when new development takes place. I consider that the planning process should be as follows. Transport Assessments (TAs) would identify whether a proposed development would generate any new problems in respect of (a) highway safety, (b) accessibility for travellers using different modes or (c) adverse environmental effects such as noise or pollution. Then, the TA should assess possible solutions to those problems, and specify the most effective and affordable measures. However, I consider that only major developments, or those likely to have a material effect on the volume or character of traffic in the area, could reasonably be expected to deliver most of the new infrastructure and facilities listed in Policy T2. The current policy is, in my opinion, unreasonably onerous. I conclude that it should be re-written to clarify that the size and nature of the proposal, as well as its impact on the transport system, will determine whether or not the listed features should be provided or enhanced.

8.2.5 On the second issue, Rhys-Davies Services Ltd points out that planning conditions and obligations should only be used if they are relevant to the development proposed. The HBF argues that developers should not be expected to contribute to improved provisions for alternative transport modes, as well as improvements to highway infrastructure. TAN (Wales) 18 (CD88) states that applicants should not be asked for improvements to address existing deficiencies in the road system.

8.2.6 Government policy is that the UDP should set out the nature and scope of any contributions which would be expected as part of the development of key sites, in order to provide developers with greater certainty. I consider that Policy T2 is helpful in that regard, and will fulfil the function better if it is amended as I recommend below. I am also of the opinion that the reasoned justification could be improved in two respects. Firstly, it should acknowledge the role which planning conditions might play, bearing in mind the scope for Grampian conditions and the advice in TAN 18, Annex D. Secondly, it should emphasise that planning obligations must be necessary and fairly and reasonably related in scale and kind to the proposed development. Also, contrary to paras 6.3.13 to 6.3.19, it should be made clear that planning obligations should be sought by negotiations and not 'required'. If the due process is followed, developers should not be expected to make excessive contributions as the objectors fear.

8.2.7 In summary, I conclude that a Transport Assessment would be the vehicle for specifying likely transport problems and assessing what type and level of provision for improvement would be warranted when a particular development proposal is submitted. Section 6.1 of the UDP explains the limited role for new road building in the future, and no doubt developers will refer to this when negotiating on planning applications with the Council. The reasoned justification to this policy should be re-written to reflect more accurately the Government's advice on planning conditions and obligations/ S278 agreements.

Recommendation

8.2.8 I recommend that the policy should be modified as follows:

'Proposals for major development or development likely to give a material increase in or material change in the character of traffic on the network should be accompanied by a transport assessment. Where this demonstrates that a proposal would have an adverse effect on highway safety or the quality of the environment, and would fail to provide convenient

access by a choice of travel mode, the scope for overcoming the problem(s) by providing the following should be investigated and secured: (1) road safety features (6) environmental improvements.'

8.2.9 I recommend that the reasoned justification for Policy T2 should be re-written to explain that planning conditions will be used where appropriate to achieve improvements, and that planning obligations will be sought by negotiation with developers in accordance with the tests established in WO C13/97.

8.3 POLICY T3
Use of Rail Transport for the Movement of Freight

Objection
Conditionally Withdrawn
DOI/51229/2112 National Assembly for Wales

Issue

8.3.1 This is whether or not the term 'will be favoured' should be replaced with 'will be permitted'.

Conclusions

8.3.2 The Council explains that it seeks to enhance and develop rail transport, but would wish to assess any development proposals against other policies in the UDP in addition to Policy T3. I consider this to be a reasonable approach, and that use of the word 'favoured' is consistent with the use of terminology outlined in General Proof 1 (CD147). The NAW has withdrawn its objection subject to 'favoured' only being used where 'permitted' would not be preferable. I consider that 'permitted' should not be used in this policy.

Recommendation

8.3.3 I recommend that no modification be made.

8.4 POLICY T4
The Re-Opening or Re-Use of Redundant or Disused Railway Lines

Objection
DO/51192/1451 Llynfi Valley Forum

Issue

8.4.1 This is whether or not the policy should refer to an extension of the rail line to Caerau, with new stations including one at Llangynwyd.

Conclusions

8.4.2 The Council advises that this policy seeks to resist development which would adversely affect the re-opening of disused railway lines. However, the UDP does not identify all possible future transportation schemes. Identified schemes must be capable of implementation within the timescale of the UDP. The Council intends to use the Local Transport Plan process to promote new schemes when the need for them is justified and funding is available. Although the Council describes the Maesteg Passing Loop scheme, which is expected to improve rail services in the Llynfi corridor, a new line to Caerau and a station at Llangynwyd have not yet been justified. I therefore see no reason to modify Policy T4 to refer to these matters.

Recommendation

8.4.3 I recommend that no modification be made.

8.5 POLICY T5 Development within Rail Corridors

Objection

DO/51186/1425 Vale of Glamorgan Council

Issue

8.5.1 This is whether or not the reasoned justification to the policy should define a railway corridor and identify the Vale of Glamorgan line.

Conclusions

8.5.2 In response to the first part of the objection, the Council proposes an amendment in the PIMS to the text in para 6.4.8. I consider that it would be useful to provide a definition of rail corridors, although I am unable to make sense of the second half of the second new sentence in the PIMS. It would be helpful to re-write this, in my opinion. Para 6.10.8 of the UDP refers to a scheme to expand the capacity of the Vale of Glamorgan railway line, and I see no reason to repeat the information.

Recommendation

8.5.3 I recommend no modification to the policy.

8.5.4 I recommend that the amendment to para 6.4.8 proposed in the PIMS be made.

8.5.5 I recommend that the second sentence in the PIMS amendment should be re-written to achieve greater clarity.

8.6 POLICY T6 Development Affecting the M4 Motorway and its Junctions

Objections

DO/51160/1360 Cofton (Wales) Ltd

Issues

8.6.1 These are:

- Whether or not the policy is too restrictive, given the importance of the M4 to the prosperity of the County Borough;
- Whether or not para 6.4.12 imposes too onerous a test for development proposals by requiring them to prove 'beyond doubt' that there would be no harm to efficiency.

Conclusions

8.6.2 On the first issue, Cofton (Wales) Ltd refers to para 1.3.4 of the UDP, which describes the importance of the M4 in attracting developers to Bridgend and its environs over the last 15 years. The objectors contend that Policy T6 has the potential to prejudice any proposals for new development in the M4 corridor. Although the Council replies that para 1.3.4 describes the current situation and the past, whereas Policy T6 looks to address future development proposals, Chapter 5 of the UDP identifies key and special employment sites on highly accessible locations within the M4 corridor. I consider that there is a conflict between the economic policies of the UDP and the constraining influence of Policy T6.

8.6.3 The objectors refer to the approach taken in Policy T7 which acknowledges the scope for mitigation measures. They also draw attention to the role of the NAW (Highways Division) in determining proposals which would affect the trunk road network. Evidence submitted by Grantchester Plc to the Inquiry in respect of the proposed development at Sarn Park refers to the effects of general traffic growth and committed developments on Junction 36 of the M4, and existing congestion. Improvements already identified by the Highway Authority are described in my section 8.22. These indicate to me that the Highway Authority would be willing to contemplate mitigation measures to improve the capacity of motorway junctions.

8.6.4 I have taken account of the advice in PPWales that available powers should be used to reduce the need to use trunk roads for short, local journeys. However, in my view, Policy T6 should be re-worded in a permissive fashion to allow development so long as effective mitigation measures can be identified and implemented. I have taken account of the revised policy wording put forward by the objector but agree with the Council that it would not be consistent with the approach outlined in General Proof 1 (CD147). I recommend a different form of words below.

8.6.5 On the second issue, Grantchester argues that, given the uncertainty of the future, the test implied in para 6.4.12 is too onerous. It is normal practice to seek a robust analysis using the best possible estimates, which is then checked by the Authority. The Council has agreed a revised form of words with the objector, which in my opinion would be more reasonable. I shall recommend that it is carried forward into the modified UDP.

Recommendation

8.6.6 I recommend that Policy T6 be modified to read: 'Development which would adversely affect the efficiency of the M4 motorway and/or its junctions will only be permitted if suitable mitigation measures can be secured.'

8.6.7 I recommend that para 6.4.12 should be re-worded as agreed between the Highway Authority and Grantchester Plc: 'will not therefore be permitted unless it can be

demonstrated that the traffic impact of the proposals can be accommodated by the transportation network.'

**8.7 POLICY T7
Development Affecting the Transportation Network**

Objections

DO/51209/1660	Countryside Council for Wales
DO/51227/1797	Harmer Partnership
DO/51152/1345	Railway Development Society
DO/50017/16	Rhys-Davies Services Ltd

Issues

8.7.1 These are:

- Whether or not the purpose of the policy is clear and distinct from other policies;
- Whether or not the policy should indicate that the scale and nature of proposals would determine the need for network improvements;
- Whether or not the policy should repeat the tests required in WO C13/97 for planning obligations.

Conclusions

8.7.2 On the first issue, the Railway Development Society argues that a problem for this and other policies in this chapter is that the transportation network is not defined. In the Society's view, it should be defined very broadly to include roads, railways, shipping, air travel, footpaths, cycleways and bridleways. The UDP should give a definition of and include more measures to promote integrated development. The Society makes some specific proposals for transport improvements in the County Borough. However, I consider that the Council has sought, in its transportation chapter, to comply with national guidance on the preparation of UDPs. It has put forward policies to favour more sustainable development by reducing reliance on the private car and encouraging other travel modes.

8.7.3 The Council brought a summary of its 'Integrated Transport Initiatives', Transport Grant Bid for 2001-2, to the Inquiry and described work on the Local Transport Plan process. The Council also outlined collaborative work with the public transport operators and neighbouring local authorities, and commented on all the detailed observations on the UDP made by the objector. I am satisfied that matters of scope and integration are legitimate concerns for the Highway Authority, but consider that no necessary amendments to the UDP arise from the objection.

8.7.4 Rhys-Davies Services Ltd argues that a significant number of other policies in the UDP would prohibit specific forms of development which would adversely affect the transport network. Policy T7 merely repeats these statements in a general way and should be deleted as unnecessary. The Council replies that Policy T7 promotes sustainable development, offers general transportation guidance and is consistent with PPWales paras 8.7.2 and 8.7.3.

8.7.5 I agree with the objector that, at first glance, this policy adds little to the UDP. However, it is different from the other policies in that it addresses the *efficiency* of the transportation network. *Efficient* transport systems are usually understood as road networks which are free from congestion, and public transport systems which are reliable, and by their routes and timings, are well attuned to travellers' needs.

8.7.6 Notwithstanding the Highway Authority's best endeavours to promote alternative modes of travel, I consider that development as envisaged in the UDP to provide additional homes, jobs and community facilities is likely to lead to some increases in road traffic. Section 6.1 of the UDP acknowledges that expanding highway capacity to relieve road congestion is a thing of the past. It advises that the predict and provide approach to highway development is unsustainable. Physical reductions in capacity may even provide the answer to some transportation problems. Given this scenario, I consider that a general policy opposing any development which would reduce the *efficiency* of the transportation system is unrealistic. Alternatively, if it were applied in such a way that highway improvements were widely sought to provide for additional traffic on the network, then it would be unsustainable.

8.7.7 PPWales paras 8.7.2 and 8.7.3 are, in my opinion, concerned primarily with ensuring that new development is accessible by walking, cycling and public transport as well as the car. There is no reference in these paragraphs to *efficiency*, although para 8.7.4 advises that the motorway system and primary route network should not be accessed directly by new development, presumably in order to allow free traffic flow as well as secure highway safety. Returning to Policy T7, in order to be sustainable and realistic, I consider that it should not place efficiency of the entire network ahead of accessibility and mode choice, and controlling harm to the environment. I agree with the objector that another general policy prohibiting development which would have an adverse effect on the transportation network is not required, especially in view of my recommendation to modify Policy T2.

8.7.8 A selective policy focusing on the efficiency of the core network could, however, be useful. Paras 6-8 of TAN (Wales) 18 refer to road hierarchy and the need for Highway Authorities to identify through routes or corridors for movement. Policy T15 of the UDP identifies transport corridors in the County Borough, which include railway lines as well as roads. I consider that, in the interests of economic development and prosperity, these corridors should be the focus of planning policy to safeguard *efficiency*. In my view, Policy T15 covers this aspect and Policy T7, even if re-worded, would merely duplicate it. I therefore conclude that the purpose of the policy is unclear and the important ground is covered by other policies.

8.7.9 Turning to the second issue, para 6.4.15 implies that the policy is directed at all types and size of development. The Harmer Partnership argues that the policy is unreasonably inflexible, and should be relaxed by adding 'unacceptable' before 'adverse effects'. The CCW considers that the policy should offer guidance for major traffic generators. However, I consider that it would be preferable to delete this policy and rely on Policy T2 as recommended for revision, to deal with major traffic generators.

8.7.10 On the third issue, the Council argues that it does not seek to use this policy to secure developer contributions or funding for all investment in transportation. Nevertheless, I consider that the reasoned justification could relate more closely to WO C13/97, to the principle that planning obligations should be sought through negotiations and that they should satisfy the key tests. I shall recommend that the policy is deleted, though much of the text in paras 6.4.14 to 6.4.18 might usefully be adapted and moved to support Policies T2 and T15 in the Plan.

Recommendation

8.7.11 I recommend that Policy T7 should be deleted.

8.7.12 I recommend that the reasoned justification be amended to achieve two aims – (a) to explain and be consistent with the modified Policies T2 and T15; and (b) to explain the role of planning obligations in accordance with WO C13/97.

8.8 POLICY T8 Development of Private Non-Residential Car Parking Spaces

Objections

DO/51223/1743	Coney Beach Leisure
DO/51227/1798	Harmer Partnership
DO/51186/1426	Vale of Glamorgan Council

Conditionally Withdrawn

<i>DO/51229/2113</i>	<i>National Assembly for Wales</i>
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Issues

8.8.1 These are:

- Whether or not the policy would be harmful to the economic viability of some shopping, leisure and tourism facilities, and would be consistent with meeting the needs of disabled people;
- Whether or not the policy would result in villages in the rural, western Vale of Glamorgan being used for overspill car parking.

Conclusions

8.8.2 On the first issue, Coney Beach Leisure argues that Porthcawl depends heavily upon car borne trade for its seaside, leisure and town centre functions. Proposed developments in the town could reduce available parking space and Porthcawl has no rail services. In the absence of quality public transport alternatives, there would be a threat to the future viability of the town's tourism, leisure and town centre activities, if parking spaces were removed. The Harmer Partnership makes a similar objection to the policy, without the direct reference to Porthcawl.

8.8.3 The Council responds that the policy is integral to its land use and transportation strategy to promote sustainable development and discourage car use. In addition to enhancing public transport facilities, it is essential for the Highway Authority to have some control over off-street car parking if reliance on the car is to be reduced. I agree with this approach, which is consistent with paras 8.4.2 and 8.4.5 of PPWales. The reasoned justification advises that the aim will be to manage the parking stock very carefully and bring the provision within current standards of car parking. As this approach is to be applied nationally, I consider that the negative economic effects predicted by the objectors should not arise.

8.8.4 The Council indicates that all disabled motorists park free of charge in Council owned car parks, and there is a percentage allocation for them in private, non-residential

developments. I consider that, with careful management as described in para 6.5.2 of the UDP, the needs of disabled people should not be harmed by the operation of this policy.

8.8.5 On the second issue, the Vale of Glamorgan Council argues that the policy is imprecise and that developers should be asked to provide sufficient private non-residential parking to meet the needs of their proposals. However, paras 8.4.2 and 8.4.3 of PPWales indicate that new developments should provide lower levels of parking than have generally been achieved in the past. These paragraphs call for collaboration with neighbouring authorities, to establish jointly maximum levels of parking for broad classes of development. The Council advises that appropriate car parking standards will shortly be published as SPG. I conclude that the Council's approach, to seek to manage and reduce non-residential private car parking, is sound and that any lack of precision or harm from overspill demand for parking space should be overcome by joint working with the neighbouring Councils and the publication of maximum parking standards.

8.8.6 The NAW objects to use of the word 'favoured'. However, the objection is withdrawn in those cases where the word 'permitted' would not be a suitable substitute. For this policy, I am satisfied that the word 'permitted' should not be used, as development control decisions would be likely to hinge on a number of policies and/or material considerations in addition to this one.

Recommendation

8.8.7 I recommend that no modification be made.

**8.9 POLICY T9
Non-Operational Car Parking Within Established Commercial Areas**

Objections

DO/51161/1363 Wm Morrison Supermarkets Plc
DO/51227/1799 Harmer Partnership

Issues

8.9.1 This is whether or not the policy would be harmful to the economic viability of some shopping, leisure and tourism facilities, and would be consistent with meeting the needs of disabled people.

Conclusions

8.9.2 The Harmer Partnership refers to the loss of economic viability which might affect shopping, tourism and leisure uses if this policy is applied and quality public transport alternatives are absent. Wm Morrison Supermarkets Plc argues that most foodstores are built with large car parks in order to attract car-borne shoppers, and the shopping habits of the population are unlikely to result in a significant modal shift. Sufficient car parking must be provided to enable new foodstores to compete with established ones, and Policy T9 should be amended to be more realistic.

8.9.3 As I have concluded in section 8.8 above, I support the Council's approach to promoting more sustainable environments through policies to encourage better public transport provision and to reduce levels of parking provision. The Council has not commented in its reply to the car parking standards proposed by Wm Morrison Supermarkets Plc. However, there is nothing in PPWales to suggest that foodstores should be exempt from the introduction of maximum car parking standards. Policy T9 relates to established commercial areas, where I would expect public transport services to be concentrated. Para 6.5.9 of the UDP indicates that parking policies will not favour out of centre developments, but should reinforce the attractiveness and competitiveness of existing centres. If car parking standards are considered on a joint basis with neighbouring authorities and transport bodies, and are subsequently applied consistently, I consider that all new developments would be competing on equal terms.

8.9.4 The Council explains that Transport Assessments and Public Transport Accessibility Audits would be sought with proposals for large scale or complex developments, and that the level of available parking opportunities within the commercial centre as a whole would be taken into account when parking provision is assessed. This holistic view of parking requirements should in my opinion overcome the harm to economic development which the objectors fear.

8.9.5 The needs of disabled people would not be neglected by this policy, as free parking provision would be available in Council owned car parks, with an allocation in private car parks. The Harmer Partnership has indicated that the provisions of forthcoming SPG could overcome their concerns. Much will therefore hinge on the exact standards which the Council includes in its future SPG. Those will be subject to public consultation and should reflect local transport provision. Overall, I am satisfied that Policy T9 provides a reasonable basis for assessing car parking provision at new developments in established commercial centres.

Recommendation

8.9.6 I recommend that no modification be made.

**8.10 POLICY T10
Non-Operational Car Parking Outside Established Commercial Centres**

Objections

DO/51188/1431	B & Q
DO/51195/1486	Tesco Stores Ltd
DO/51161/1887	Wm Morrison Supermarkets Ltd
DO/51227/1800	Harmer Partnership

Issue

8.10.1 This is whether or not the policy should be made more flexible so as to reflect the individual, operational requirements of particular types of development and sites, and to avoid a proliferation of on-street car parking which could be detrimental to road safety or residential amenity and contrary to other UDP policies.

Conclusions

8.10.2 The objectors are particularly concerned about the provision of parking for retail developments. Tesco Stores Ltd asks how 'non-operational car parking' will be defined, and the Council puts forward the definition of 'Visitors' Parking' from Transport in the Urban Environment.' I consider that it would assist users and readers of the UDP if this definition were explained in the reasoned justification for Policies T9 and T10.

8.10.3 B&Q Plc argues that retailers selling predominantly bulky goods will inevitably require a 'reasonable number of car parking spaces for their customers'. In general, the objectors seek greater flexibility in this policy, whereby the individual needs of the developer and prevailing local circumstances determine the parking requirements rather than a predetermined standard. The Council replies that forthcoming SPG will give parking standards for different types of development, and this SPG will be the subject of public consultation. I am advised that the Harmer Partnership has held discussions concerning this SPG with the Highway Authority. I consider that the SPG process should provide an opportunity for standards to be thoroughly debated, and I agree with the Highway Authority that they would be too detailed for inclusion in the UDP.

8.10.4 As I have concluded in sections 8.8 and 8.9, I support the Council's approach to promoting more sustainable environments through policies to encourage better public transport provision and to reduce levels of parking provision/provide for maximum standards. The Council has indicated in para 6.5.9 of the UDP that it will not seek to undermine the attractiveness of town centre sites by permitting generous parking provision out of town. This leads me to reject the revised wording of Policy T10 proposed by B&Q Plc.

8.10.5 The Highway Authority reports that it is mindful of the effect that inadequate parking arrangements could have on adjoining roads, but considers that this should not justify a higher level of parking on out of centre sites. I accept that there may be other solutions to such problems, and the Authority indicates that these would be addressed through SPG.

Recommendation

8.10.6 I recommend that no modification be made to Policy T10.

8.10.7 I recommend that the reasoned justification for Policies T9 and T10 be extended by the addition of a brief definition of 'non-operational car parking.'

8.11 POLICY T11 Proposed Lorry Parking

Objection

DO/51205/1566

Welcome Break Plc

Issue

8.11.1 This is whether or not this policy is reasonable, given the review of the motorway services area which the objectors are undertaking.

Conclusions

8.11.2 The objectors advise that Welcome Break Plc is reviewing the uses at Sarn Park services, and the current facilities may not be available in the future. At the Inquiry, the objectors sought confirmation from the Council that it had no objection to the lorry park being moved within the wider motorway service area site, and would not expect the lorry park to be enlarged. The objectors indicated that, if this were agreed, the objection would be withdrawn.

8.11.3 I consider that Policy T11 and its supporting text are consistent with the revisions to facilities which the objectors described at the Inquiry, involving the re-location of the lorry park and no change in its current size. Although removal of the existing lorry park would pose a conflict with the aims of the policy, I consider that it is directed at *additional* strategic lorry parks and does not address the relocation within a large site of existing ones. In my view, the text in para 6.6.2 simply describes the current situation and need not be amended until there is greater certainty that the motorway services uses will be changed. In these circumstances, I conclude that Policy T11 and its supporting text are reasonable.

Recommendation

8.11.4 I recommend that no modification be made.

8.12 POLICY T12 Control of Road Freight Movements

Objection

DO/51227/1801 Harmer Partnership

Issue

8.12.1 This is whether or not the policy is realistic, reasonable and consistent with growth of the local economy.

Conclusions

8.12.2 The objector contends that the aims of this policy are reflected elsewhere in the UDP, and will be achieved largely by way of land use allocations and traffic management measures. The Council recognises that lorry movements are vital for the economic development of the County Borough, but argues that they can cause an environmental nuisance. The environmental disbenefit could deter other inward investment and be harmful to the local economy.

8.12.3 I consider that the policy could be seen as discouraging by industrial and commercial operators, and contrary to the thrust of the Council's employment policies. It could be applied so as to exclude lorries from many parts of the County Borough's urban and rural areas, especially as 'residential areas' and 'environmentally sensitive areas' are undefined. (I presume the latter are not the ESAs of national significance illustrated on Map 5.1 in PPWales). As written, I consider that the policy is neither realistic nor reasonable.

8.12.4 In my opinion, the UDP has allocated a substantial amount of land to cater for the needs of industry and commerce to the end of the Plan period. It has also identified key redevelopment sites and regeneration sites to which commercial enterprises might be attracted.

I would expect these allocations to have been put forward following discussions with the Highway Authority, and to be compatible with safe and unintrusive freight movements. In addition, there are a number of policies in the UDP which would protect the quality of the environment from the harmful effects of freight movement, such as Policies EV1, 9, 10 and EV49 as proposed for amendment in the PIMS, and Policy E9. These factors incline me to the conclusion that the policy may be unduly restrictive to the growth of industry and commerce, and unnecessary.

8.12.5 The Council, in its reply to the objector, concedes that there are some similarities with Policy T13 and that a case could be made for combining them. In my view, loss of any distinction between location and access, to which the Council refers, would be inconsequential. I conclude that Policy T13 provides the necessary safeguards, and Policy T12 should be deleted.

Recommendation

8.12.6 I recommend that Policy T12 should be deleted.

8.12.7 I recommend that the reasoned justification for Policy T12 be merged with the text following Policy T13, and modified accordingly.

**8.13 POLICY T13
Mitigation of Freight Movement on the Environment**

Objection
Conditionally Withdrawn
DO/51229/2114 National Assembly for Wales

Issue

8.13.1 This is whether or not the word 'favoured' should be used.

Conclusions

8.13.2 The NAW has withdrawn its objection to this word, as long as it is used appropriately. In this case, bearing in mind that any development proposal would be assessed in terms of all relevant policies in the Plan, I see no reason why the policy should not use the word 'permitted', instead of 'favoured'.

Recommendation

8.13.3 I recommend that Policy T13 be modified by use of the word 'permitted' in place of 'favoured'.

**8.14 POLICY T14
Development Affecting Public Rights of Way**

Objections
DO/51209/1661 Countryside Council for Wales

Issues

8.14.1 These are:

- Whether or not the policy is necessary, given the protection to Rights of Way under other legislation;
- Whether or not policy should be re-worded to refer to the promotion of walking and cycling, with a cross-reference to countryside recreation and public transport provision.

Conclusions

8.14.2 On the first issue, rights of way are protected under various sections of the Highway Act 1980, and it is a sound principle in development plans not to duplicate the provisions of other legislation. However, the Council has drawn attention to the Planning Officers Society – Better Local Plans, A Guide to Writing Effective Policies, 1997, which advises that a plan could set out the attitude which will be adopted towards the enhancement and protection of rights of way affected by development proposals. Given the UDP's commitment to promoting sustainable transport modes, and the importance of securing accessibility on foot to new developments, I consider that a policy on rights of way is appropriate.

8.14.3 On the second issue, the CCW proposes a broader policy which would aim to enhance the existing route network and integrate it with the public transport network and countryside strategy. However, I agree with the Council that other policies in this chapter and in Chapter 9 of the UDP address the wider aspects of walking and cycling, and there is no need for duplication. The UDP should be read as a whole, and I see no need for cross-referencing as proposed. I shall not therefore recommend the proposed alternative form of wording.

Recommendation

8.14.4 I recommend that no modification be made.

8.15 POLICY T15 Development in Transport Corridors

Objections

DO/51227/1803	Harmer Partnership
DO/50017/17	Rhys-Davies Services Ltd
DO/51205/1568	Welcome Break Plc

Issues

8.15.1 These are:

- Whether or not the policy is necessary given the locational principles set out in other policies; if it is, whether or not it should adopt a more positive approach;
- Whether or not para 6.8.10, requiring a proof 'beyond doubt' of no adverse effects, is reasonable;

- Whether or not highway improvements to access land to the west of Maesteg Road, Tondu, should be confined to those necessary to serve the proposed regeneration site.

Conclusions

8.15.2 On the first issue, the Highway Authority intends Policy T15 to guide integrated transport investment according to a strategy to promote multi-modal transport corridors. PPWales para 8.6.2 advises that the UDP should address accessibility and the provision of strategic and integrated transport facilities. Given the amendments to other policies in this Chapter which I have recommended, I consider that Policy T15, which aims to maintain the capacity of the main transport corridors and keep them free from environmental damage, is essential.

8.15.3 The objectors have not explained what precisely they envisage by a more positive approach for this policy. In my opinion, this policy could be strengthened by the addition of a brief statement of purpose, with a more specific description of the 'transportation problems' which should not be created or exacerbated. On the purpose of the policy, I consider it necessary to look beyond the achievement of more transport investment. I would expect the policy aims to include a free flow of traffic (by all modes) in the main transport corridors in the County Borough, and safe and convenient routes for travel between the main settlements and employment sites, and to and from major destinations outside the County Borough.

8.15.4 At the same time, the policy should protect the environment for those who live and work along these corridors. In addition, it should acknowledge that mitigation measures may make seemingly unacceptable developments acceptable. I shall recommend some re-wording to achieve a more positive policy. I shall take account of the conclusions reached in my section 8.7 above on Policy T7.

8.15.5 On the second issue, Welcome Break Plc criticises the test set in para 6.8.10 of the UDP as being unreasonably high. I agree that the effects of future developments are usually based on a set of assumptions about an uncertain future, and are difficult to prove beyond doubt. The Council has put forward an alternative form of words which, in my view, would satisfactorily overcome the objection. I recommend the adoption of the proposed change to the last sentence.

8.15.6 Turning to the third issue, Rhys-Davies Services Ltd argues that highway improvements to access land to the west of Maesteg Road, Tondu, should be limited to those necessary to serve the various parts of the overall site and should not aim to address perceived existing problems. The Highway Authority in response states that it will not use this or other policies in the UDP 'as a carte blanche tool to fund transportation projects.' Quite properly, it indicates that all transport improvements necessary for development to take place will be assessed under the tests for planning obligations set out in WO C13/97.

8.15.7 Land West of Maesteg Road is referred to in para 6.8.14, and the paragraph suggests that its development will require highway works even though it is not affected by 'these constraints.' However, any highway improvement works sought from the site's developers in the corridor should be directly related to the planned development. I conclude that the meaning of this paragraph is unclear, and that it could usefully be re-written in plain English and in line with WO C13/97.

Recommendation

8.15.8 I recommend that the policy be re-worded as follows:

'The following transport corridors are identified as the main routes in the County Borough for the movement of people and goods. Development which would (a) adversely affect safe and efficient movement in these corridors, and/or (b) would create or exacerbate harm to the environment along them, and (c) would not be capable of mitigation, will not be permitted. The corridors are: T15(1)

8.15.9 I recommend that para 6.8.10 be re-written so that the last sentence reads: 'Therefore such development will be resisted by the Council unless it can be demonstrated that the traffic impact of the proposals can be accommodated by the motorway and its junctions either in the short or the long term.'

8.15.10 I recommend that para 6.8.14 be re-written to clarify that highway works sought in connection with the development of land west of Maesteg Road, Tondu would be directly, fairly and reasonably related to it.

8.15.11 I recommend that para 6.8.28 be modified as explained in section 8.39 below.

8.16 PARAGRAPHS 6.9.1 - 6.9.5 The Highway Network A4061 Bryncethin By-Pass & A4063 Maesteg Relief Road

Objections

DO/51082/1224	Cllr G Walters
DO/51192/1453	Llynfi Valley Forum
DO/50871/922	Cllr H C Davies

Issues

8.16.1 These are:

- Whether or not the A4061 Bryncethin Bypass scheme identified in the Mid-Glamorgan Replacement Structure Plan but not included in the deposit UDP should be reinstated;
- Whether or not transport plans for the eastside washery development, Maesteg, are clearly defined.

Conclusions

8.16.2 On the first issue, Cllr Davies contends that removing this scheme would be unacceptable to the business community, commuters and residents of the Ogmere and Garw Valleys. He considers that there would be adverse effects for residents of Bryncethin from traffic noise and pollution on their quality of life. At the Inquiry, I was referred to the existence of an alternative alignment for a bypass which might be less costly than the UDP scheme. The Ogwr Borough Local Plan refers in para 6.8.2 to possible routes for a Bryncethin Bypass east and west of the settlement, and asserts that 'greater traffic and land use benefits may be derived from a western route'. Cllr Walters describes existing high levels of traffic through the village which are likely to increase with intended developments in the area, notably at Parc Derwen and Cae Derwen. He argues that the highway network of the eastern valleys near Newport, and from the M4 into the Rhondda, is superior to that into the Ogmere Valley, so that

the NAW should look favourably at funding for this bypass. Neither objector submits any traffic or environmental evidence to substantiate their representations.

8.16.3 Paras 6.9.1 to 6.9.3 of the deposit UDP indicated that the Bryncethin Bypass scheme was to be dropped because it represented an outmoded approach to solving local environmental problems. As section 6.1 of the UDP advises, current transport policy favours solutions other than new road building, such as traffic management, traffic calming and the provision of better pedestrian facilities, in order to provide environmental enhancement where local problems arise. Having visited Bryncethin, and taking account of the likely effects of developments at Parc Derwen and Cae Derwen on traffic on the A4061, I see no reason why such an approach, in line with contemporary transport planning principles and avoiding the loss of countryside to new road building, should not be pursued.

8.16.4 The Council proposes an amendment in the PIMS whereby the north-eastern section of the Bryncethin bypass would be reinstated. It provides no reasoning to explain why the sentiments in sections 6.1 and 6.9 of the UDP should be set aside. The PIMS amendment has produced a number of counter-objections to which I respond in section 8.29. I also give my reasons later in this chapter, section 8.23, for recommending deletion of the proposed Bryncethin link to the south of this scheme. I conclude that neither an alternative alignment for the bypass nor the amendments proposed in the PIMS should be made.

8.16.5 On the second issue, the Llynfi Valley Forum argues that the transport plans for the east side washery development are not clearly defined. The Council responds that transportation requirements would be assessed in line with the approach described in its General Proof 5 – Transportation Corridors (CD154). The objectors seek an opportunity to comment on any plans before they become a reality, and the Council advises that a development brief would be required prior to development of the Maesteg Washery site. Paras 15.2.5 to 15.2.9 of the UDP confirm that community involvement is a key objective of regeneration schemes, and this should enable the objectors to give their views when firmer proposals are in place. I conclude that no amendment to paras 6.9.1 to 6.9.5 of the UDP would be necessary.

Recommendation

8.16.6 I recommend that no modification to the deposit UDP be made.

8.16.7 I recommend that the amendments proposed in the PIMS to paras 6.9.1 to 6.9.3 and to Policy T16 for a new T16(17) scheme, with changes to the Proposals Map (Ref: A17), should not be made.

**8.17 POLICY T16
Major Improvements to the Highway Network**

Objections

DO/50003/338 Mr W C Rickard
DO/51194/1480 Welsh Development Agency

Issues

8.17.1 These are:

- Whether or not the UDP should give more information about access arrangements for the proposed Parc Derwen housing development, and should show an access point at the Derwen roundabout to the north-west;
- Whether or not Policy T16 goes beyond the guidance on Planning Obligations in WO C13/97.

Conclusions

8.17.2 On the first issue, Mr Rickard highlights para 6.9.11 of the UDP, and the statement that 'Other highway works will include sufficient, effective and appropriate access points to the development site (Parc Derwen) to ensure adequate and suitable movement both within the site and on the existing highway network.' He considers that the provision of an access point at the Derwen/Pen y Cae roundabout to the north-west shown on earlier plans should be revived, to avoid congestion on the south and south-west sides of the development site. The Council's response to the Coity Village Association (objections 50864/895-100) indicates that analysis of traffic from Parc Derwen was undertaken on a 'worst case car basis'. This showed that the network would be able to cope with accesses to Parc Derwen from Heol West Plas. Encouragement to public transport, cycling and walking would reduce the number of car trips and congestion, in the Council's opinion.

8.17.3 The presence of common land imposes a constraint on the provision of a new access at the north-western corner of the development, though the Council accepts that an access to the Pen y Cae roundabout would be desirable. It argues that the internal road layout at Parc Derwen would allow for future implementation of such a link if it were needed. In my view, the UDP is not the appropriate place to describe the details of access arrangements and timing for the Parc Derwen development. I am satisfied that they have been analysed appropriately, and I see no need for the UDP to show an access point at the Derwen roundabout to the north-west.

8.17.4 On the second issue, the WDA argues that this policy, and in particular the highway schemes identified as Brackla Industrial Access Road, Heol Simonstone, M4 Junction 36 and Bryncethin link, should not seek funding wholly from developers. The WDA refers to WO C13/97, which makes clear that contributions towards new infrastructure should be directly and reasonably related to the developments proposed. The Council states that all transportation improvements that are necessitated by land use development will be assessed against the tests for planning obligations. However, I consider that neither the policy nor the reasoned justification makes this clear.

8.17.5 Policy T16 lists major highway improvements which the Council seeks, but which are dependent upon funding by developers. In my opinion, the Council should not insist that these schemes be provided, until the details of development on allocated sites are available and full transport assessments of the impact of development have been made. It is conceivable that alternative solutions to the highway improvements put forward in this policy may be identified, and this counts against rigidly defining the solutions in advance. I shall recommend amendments to Policy T16 and paras 6.9.7 and 6.9.8 to address the conflict with WO C13/97. I agree with the WDA that amendments to the wording of other paragraphs in this section are needed to avoid the mistaken notion that developers will be 'required' to enter into planning agreements.

Recommendation

8.17.6 I recommend that Policy T16 be modified as follows:

'Major improvements to the highway network will be *permitted* at the following locations: T16(1) T16(16) Brackla Industrial Estate Access Road, Bridgend.'

The final three lines of the policy should be modified to read: 'Where one of these schemes is necessary to facilitate related development, a development brief and/or planning obligations may be sought to secure the highway improvement.'

8.17.7 I recommend that paras 6.9.7 & 6.9.8 be modified along these lines:

' A number of allocations for development have been made in the UDP which are likely to have a significant impact on the existing transportation network. The Highway Authority has identified the above highway improvement schemes which would overcome the problems for the network that the new developments are predicted to cause. In most cases, when new developments in accordance with the UDP allocations are proposed, the Council will seek a development brief and transport assessment indicating the impact of the new development on the transportation network and any suitable mitigation measures. Where the development would have a significant adverse impact on the network, developers may be asked to enter into planning obligations, to ensure that the identified problems are overcome by the implementation of appropriate highway improvements.'

8.17.8 I recommend that the wording of the following paragraphs be amended to comply with advice that planning obligations should be sought through negotiations and not 'required' – paras 6.9.12-6.9.13 and 6.9.18-6.9.21.

8.18 POLICY T16.1 Major Improvements to the Highway Network Coity Bypass, Bridgend

Objection

DO/51194/1481 Welsh Development Agency

Issue

8.18.1 These are:

- Whether or not the Parc Derwen development should contribute to provision of the Coity Bypass;
- Whether or not this policy is consistent with national guidance on developer contributions to highway improvements.

Conclusions

8.18.2 On the first issue, the Council proposes a change to the Plan whereby the Coity Bypass and Brackla Industrial Estate Access Road will change names. The Coity Bypass will then be the same as that shown in the Ogwr Borough Local Plan. I support the proposed name change. In my view, the scheme currently shown as Policy T16(16) on the Proposals Map should remove unwanted traffic from Coity village and would be reasonably related to the Parc Derwen housing development.

8.18.3 The Council also proposes to re-name scheme T16(1) as the Brackla Industrial Estate Access Road and advises that analysis of the traffic impact of the Parc Derwen development leads it to the view that the housing development would not require this improvement. I consider that it would be reasonable to change the name of this scheme as proposed.

8.18.4 The WDA argues that the improvement scheme currently shown as T16(1) would be more appropriately associated with other developments in the area, particularly the proposed superstore at Brackla (R9(1)). However, the Council has put forward an amended reasoned justification for this road indicating that improvements to this link would be required if both the retail development and the redevelopment of the Brackla Industrial Estate (E2) went ahead. It seems reasonable to me that new development on the adjoining industrial land should be asked to contribute to the proposed highway improvements.

8.18.5 Turning to my second issue, the proposed changes do not overcome the WDA's concern on planning obligations as set out in national guidance, in WO C13/97 and TAN (Wales) 18: Transport. Para 6.9.11 'requires' developers to enter into an agreement with the Council to provide the highway works, as does the new proposed text for the Brackla Industrial Estate Access Road. In my opinion, this wording does not fairly reflect national guidance that planning obligations should be negotiated with developers. The WDA suggests that the sentence 'A contribution to highway improvements related to the level of traffic generation attributable to the particular development may be sought' should be woven into paras 6.9.10 and 11. I consider that this would significantly improve the tone of these paragraphs and should be adopted in order to comply with national policy guidance. The WDA is prepared to withdraw its objection to para 6.9.43 if this change is made, and I shall not recommend a change there.

Recommendation

8.18.6 I recommend that the names of highway improvement schemes under Policies T16(1) and T16(16) should be modified as proposed by the Council.

8.18.7 I recommend that the reasoned justification be amended to describe the Coity Bypass and Brackla Industrial Estate Access Road schemes and the developments which they are expected to serve using the text in the Council's response to the WDA (DO 51194/1481).

8.18.8 I recommend that the revised paras 6.9.10 and 6.9.11 should include the wording: 'A contribution to highway improvements related to the level of traffic generation attributable to the particular development may be sought.'

8.18.9 I recommend that the amended text described in para 8.18.7 above be further modified to delete the phrase 'there is a requirement on E2(1) and R9(1)'. Wording along the lines 'developers of sites E2(1) and R9(1) will be asked to contribute to highway improvements' should be substituted.

**8.19 POLICY T16.2
Major Improvements to the Highway Network
B4281/Heol Simonstone Improvement, Bridgend**

Objection
DO/50864/900 Coity Village Association

Issue

8.19.1 This is whether or not the improvements to Heol Simonstone could be secured in the near future.

Conclusions

8.19.2 *I have spelt 'Heol Simonstone' thus in my report, in accordance with the UDP, although I see that it was called 'Simonston' in the Ogwr Borough Local Plan and elsewhere.*

8.19.3 The objectors are concerned about the impact of major housing development at Parc Derwen on the surrounding road network, including the road to Coychurch. They contend that a wider railway bridge should be constructed and welcome the proposal for development on the Brackla Industrial Estate to provide for improvements. However, they argue that the improvements will be needed before the housing development is in place, and there is insufficient security that the improvements will take place by then.

8.19.4 The Council points out that the Heol Simonstone improvement is justified by forthcoming developments at the Industrial Estate which may not occur at the same time as development at Parc Derwen. I accept that the road improvements cannot be tied to development thresholds and timings at Parc Derwen and shall not recommend a change to the UDP policy.

8.19.5 The Council has put forward a proposed amendment to the reasoned justification for T16 (2) to the first sentence in para 6.9.12. I consider that this more accurately describes the stretch of road which needs to be improved and shall recommend this change be made.

Recommendation

8.19.6 I recommend that no change be made to Policy T16(2).

8.19.7 I recommend that the end of the first sentence in para 6.9.12 be amended to read: 'will increase traffic volumes along Heol Simonstone from its junction with Coychurch roundabout.'

8.20 POLICY T16.3 Major Improvements to the Highway Network Pencoed Inner Relief Road

Objection

DO/51201/1528 Bellway Homes (Estates) Ltd

Issues

8.20.1 This is whether or not there should be more development permitted west of the railway line in Pencoed in order to achieve a new relief road and bridge across the railway line.

Conclusions

8.20.2 The objectors support the Pencoed Inner Relief Road in order to relieve pressures within the town. They argue that existing commitments for development west of the

railway line are insufficient to finance the construction of a new bridge. Bellway Homes (Estates) Ltd proposes a new housing allocation at Hendre Road, Pencoed which, they argue, would ensure that the transportation objectives could be achieved.

8.20.3 I have seen conditions at the level crossing at the eastern end of Hendre Road, and the resulting traffic congestion in The Square which extends back towards Penybont Road. I accept that the current highway arrangements increase journey times and cause localised environmental problems, which would be alleviated if a new bridge were constructed. The interim road link has a limited capacity and the Inner Relief Road has been an aim of the Highway Authority for many years. However, I have concluded in Chapter 6, section 6.22, that land at Hendre Road, Pencoed, is not needed for housing development.

8.20.4 Section 6.1 of the UDP indicates that, in order to achieve sustainable development, investment in highway infrastructure to remove road congestion and meet growth in traffic is likely to be less than in the past. The potential benefits from a new bridge over the railway here would, in my view, be primarily related to relief from congestion. The objectors made no case for the scheme on economic development or highway/rail safety grounds. Without the objectors' proposed housing scheme, the future increase in traffic on Hendre Road would be less. I see no reason to amend Policy T16(3) or its reasoned justification in the light of this objection.

Recommendation

8.20.5 I recommend that no modification be made.

**8.21 POLICY T16.4
Major Improvements to the Highway Network
Coychurch Road – Cowbridge Road Link, Bridgend**

Objections

- | | |
|---------------|--------------------------|
| DO/50001/917 | Bridgend Civic Trust |
| DO/51173/1382 | E Brown |
| DO/51054/1183 | Clerical & Medical Group |
| DO/51171/1379 | Mr A Tingle |

Issues

8.21.1 These are:

- Whether or not an alternative alignment for the road link should be pursued;
- Whether or not, as the scheme would lead to the loss of a sporting facility, the Plan should identify an alternative location for the sports field.

Conclusions

8.21.2 On the first issue, the Council advises that the proposed road link was put forward in earlier development plans, but is included in the Bridgend UDP for different reasons, to complement the town centre regeneration scheme. The scheme would complete the highway 'box' around the town centre assisting traffic circulation and distribution. It would enable traffic to be taken away from Nolton Street, Derwen Road and Brackla Street. In

addition, it would enable traffic to bypass the existing junction of Coychurch Road and Cowbridge Road, giving highway safety benefits without the need for demolition of residential property. The Civic Trust expresses its support for the scheme's concept but not for the chosen alignment. Other objectors also consider that a new line, which would safeguard the football ground and the associated community facilities, would be desirable.

8.21.3 The Civic Trust identifies a route from between the two railway bridges on Coychurch Road, extending through Coychurch Yard into the industrial estate, and joining Cowbridge Road either at York Road/South Road or the police headquarters. This would have the advantage of directing traffic away from one of the bottlenecks caused by the rail bridges on Coychurch Road, reducing traffic movements near Bridgend College and creating an additional entrance to the industrial estate as well as safeguarding the sports/recreational facilities. However, the Council argues that the route would be costlier and lengthier. In my opinion, the alternative alignment would not fulfil the main objective of completing the 'box' around the town centre, and would not assist the transport strategy for revitalising the town centre. I agree with the Council that an additional vehicular entrance to the industrial estate as identified would not be significantly beneficial.

8.21.4 The Council indicates that the junction opposite Bridgend College would be designed and constructed in accordance with approved standards and would incorporate pedestrian crossing facilities. In view of the high accident rate at the existing road junction of Coychurch Road and Cowbridge Road, I consider that a well designed new junction would offer substantial benefit. I conclude that the alignment for the Coychurch Road/Cowbridge Road link is fitted for its purpose and should not be substituted with the alignment put forward by the objectors. In reaching this conclusion, I have taken account of the petition which was handed to the Inquiry by the Civic Trust, expressing opposition to the proposed link road.

8.21.5 On the second issue, I have had regard for the importance to the local community of the existing sporting and recreation facility, as indicated in my Chapter 5. The Proposals Map in the deposit UDP shows that the sports' field would be dissected by the road improvement scheme. However, Policy RC3 requires alternative and equivalent facilities to be provided if the land is to be taken, and the Council accepts the need for replacement community facilities to be provided. If a suitable alternative site for a sporting and recreational facility is identifiable, I consider that it should be indicated in the UDP, but its absence at this stage should not preclude the scheme in Policy T16(4).

8.21.6 Clerical and Medical Group objects that the scheme could adversely affect the proposed housing site in Policy H1(54). However, I consider that the proposed Coychurch Road/Cowbridge Road link as described in paras 6.9.16 and 6.9.17 of the UDP and illustrated on the Proposals Map would have no impact on the objector's housing site.

Recommendation

8.21.7 I conclude that no modification be made.

**8.22 POLICY T16.5
Major Improvements to the Highway Network
M4 Junction 36**

Objection
DO/51144/1329 Grantchester Plc

Issues

8.22.1 This is whether or not Policy T16(5) and the reasoned justification should be amended in the light of proposals for development put forward by these objectors, and changes in circumstances since the deposit version of the Plan was prepared.

Conclusions

8.22.2 Consultants for Welcome Break Plc (Savell Bird & Axon) argue that the policy is unclear as to what is expected from developers within the vicinity of J36 on the M4. The objectors summarised the situation for improvements to the M4's Junction 36 in a letter to the Council dated 29 May 2002. They identified three types of scheme as follows:

- Relatively minor improvements to the junction which, it has been agreed, would be sufficient for 1500 new dwellings on the Parc Derwen site.
- An interim improvement scheme which would increase the capacity of the roundabout by 25% and would cost about £1.2 million. An Objective 1 funding bid has been made for this proposal which would supersede the minor improvements.
- A second bridge over the M4, which has been considered in connection with the development of Sarn Park, and would accommodate all development and background traffic growth to year 2017.

The Council agrees that this is the current situation. I consider that the supporting text in paras 6.9.18 and 6.9.19 of the UDP could provide more up to date and precise information as to what may be acceptable at Junction 36 in the Plan period.

8.22.3 Welcome Break Plc contends that removal of the motorway services area would lead to a reduction in traffic movements to and from the motorway, and its reuse for retailing would produce no increase in vehicular travel distances. The Council has not disputed the evidence. Nevertheless, any major development proposal would require a specific and full transport assessment. Only if this demonstrated a harmful impact on Junction 36, would the Council be entitled to ask for mitigation measures, in accordance with national guidance in Tan (Wales) 18: Transport, and WO C 13/97: Planning Obligations.

8.22.4 Grantchester Plc recognises the potential need for improvements to Junction 36 of the M4 and is broadly supportive of this section of the UDP. However, objection is made to the last sentence of para 6.9.19 requiring works to be entirely funded by development proposals. Consultants to the objectors argue that there could be a doubling of traffic through the motorway junction by 2017 even if Sarn Park does not go ahead. I have recommended that the mixed use development at Sarn Park should not be allocated in the UDP. Nevertheless, I recommend in section 8.17 that para 6.9.19 could usefully be re-written to be more consistent with WO C13/97: Planning Obligations, which requires a process of negotiation and compliance with a number of tests including necessity, and being directly related to the proposed development.

Recommendation

8.22.5 I recommend that the reasoned justification for Policy T16(5) in paras 6.9.18 and 6.9.19 should be modified (1) to describe the schemes which have been put forward to improve

M4 Junction 36, and (2) to clarify that the use of planning obligations to secure highway improvements will involve negotiations on a scheme by scheme basis, and adherence to the principles in B3 and B4 of WO C13/97.

**8.23 POLICY T16.6
Major Improvements to the Highway Network
Bryncethin Link**

Objections

DO/50880/946	Bridgend Biodiversity Partnership
DO/51184/1416	Coed Cadw Woodland Trust
DO/51185/1418	Coity Walia Commoners Association
DO/50911/985	Ms S Davies
DO/50899/969	Mr & Mrs Farmer
DO/51144/1328	Grantchester Plc
DO/51199/1509	Mr H Griffiths
DO/51199/1510	Mr H Griffiths
DO/51199/1511	Mr H Griffiths
DO/51199/1512	Mr H Griffiths
DO/51058/1188	Mr C Hopkins
DO/50878/932	M R Keating
DO/51059/1191	Ms A Lalic
DO/51060/1193	Ms M Lalic

Issues

8.23.1 These are:

- Whether or not it is reasonable to expect these highway works to be entirely funded by development at Sarn Park;
- Whether or not the proposed link should be included in the UDP.

Conclusions

8.23.2 On the first issue, the Council proposes a late further amendment to paras 6.9.20 and 21 of the UDP to indicate that scheme T16(6) would be promoted with developer contributions fairly and reasonably related in scale and kind to the traffic generated by their proposals. I have already recommended in my section 8.17 that the text of paras 6.9.20 & 21 should be amended. I consider that, if the proposed road link and Sarn Park development were to be included in the UDP, the revised text in the Council's response to Grantchester's objection 51144/1328 would require further amendment to comply with WO C13/97, and the advice that planning obligations should be negotiated.

8.23.3 On the second issue, the Council provides scant information as to why this highway improvement scheme is singled out for promotion by the Local Authority. The fact that the highway scheme has been included in earlier development plans is not, in my view, a good enough reason for its inclusion in the UDP. The scheme is reported by the Council to give a 'healthy economic return' based on COBA although, bearing in mind the objections from Coed Cadw and M Lalic, justifying a new road on this criterion alone conflicts with Part 1 Policy 7 of the UDP. The strategic policy aims for efficient use of the *existing* network, increased public

transport usage and *reductions* in car-borne journeys. Coity Walia Commoners' Association advises that recent road improvements have greatly improved highway safety and efficiency through Bryncethin, and that the bypass as proposed would only be required to facilitate development of Sarn Park.

8.23.4 After assessing likely future traffic flows, Grantchester Plc concludes that a bypass of Bryncethin is not required. It argues that by 2017 only 10% of all traffic would be generated by development at Sarn Park. The Council concedes that development at Sarn Park could not be refused planning permission on the grounds of harm associated with increased traffic movements through Bryncethin. Ms M Lalic argues that further improvements to the A4061 through Bryncethin, including traffic calming past the school, plus upgrading Heol Spencer, would be a less disruptive alternative to the Bryncethin link.

8.23.5 The Council advises that the link road would reduce traffic along the A4061 thus improving the local environment in terms of air quality, noise pollution and pedestrian safety. It considers that Heol Spencer is less suitable to serve the Sarn Park development and its improvement would also have harmful environmental consequences. However, a full environmental assessment has not been undertaken, and the COBA program showed that the existing accident record is well below the national average for this type of road. Having seen the road through Bryncethin and other transport corridors in the County Borough, I remain unclear as to why this stretch of the A4061 has been singled out for bypassing and what, if not Sarn Park, is the justification for the Local Authority's support. I agree with Grantchester's transport consultants and local people that there is potential for alternative measures to deal with highway safety, capacity and amenity.

8.23.6 Mr Griffiths and Mr Hopkins express concern over the loss to the proposed new road of common land over which there are rights of public access, and which has recreational and nature conservation value. Bridgend Biodiversity Partnership confirms that the highway scheme would cut through the Cefn Hirgoed candidate SINC which is regionally important for nature conservation. Coed Cadw is 'alarmed' that the Plan shows a new highway through an irreplaceable ancient woodland at Coed Cae Helyg. Coed Cadw also foresees significant harmful impacts for air quality and landscape, if the new road is built. The Proposals Map shows the line of the proposed Bryncethin link running through a special landscape area.

8.23.7 In conclusion, though the Council argues that the road improvement is necessary for the economic and social development of the County Borough, I consider that there is scant supporting evidence. Neither major development at Sarn Park nor other sources of traffic growth are forecast to give rise to serious transport problems in Bryncethin in the Plan period. To be compatible with Part 1 Policy 7, improvements to the existing highway network should be utilised first to resolve local environmental and safety problems. There is overwhelming evidence, even before an environmental assessment is undertaken, that the Bryncethin link would cause harm to substantial nature conservation, landscape and amenity interests. I consider that the effects of a new road here in the countryside have not been given sufficient weight by the Council. I conclude that the Bryncethin link should be deleted from the Plan.

Recommendation

8.23.8 I recommend that Policy T16 (6) be deleted from the Plan.

8.23.9 I recommend that the reasoned justification be deleted.

8.24

POLICY T16.8

Major Improvements to the Highway Network Wern Fawr/Wern Tarw/Rockwool Access

Objections

DO/50880/935	Bridgend Biodiversity Partnership
DO/50005/341	Mrs V Bunn
DO/51209/1662	Countryside Council for Wales
DO/50951/1039	Mr D Djukic

Issue

8.24.1 This is whether or not the proposed highway improvement should be included in the UDP, given its relationship to countryside which has interest for nature conservation.

Conclusions

8.24.2 Objectors to this policy have also made representations on Policies E3(21) and E3(22) for industrial and commercial allocations at Wern Tarw and Wern Fawr. My conclusions on the employment land allocations are given in Chapter 7. Though I agree with the Council's proposal in the PIMS to delete the Wern Fawr allocation from the UDP, I recommend that the substantial site at Wern Tarw should be included in the UDP.

8.24.3 Paras 6.9.24 and 6.9.25 of the UDP explain that improvements would be sought to the existing route to Junction 35 on the motorway. In my opinion, if new industrial and commercial development takes place at Wern Tarw, it would be reasonable to upgrade the local road network to provide the safe and efficient movement of the associated additional traffic. As the Council points out, any highway works would only be triggered by new development. Although the area has importance for nature conservation, PPWales indicates that non-statutory designations should not unduly restrict acceptable development. As there is an existing road and there would be scope for mitigation measures, I would expect any harm to the countryside or wildlife and habitats to be capable of management. I conclude that the proposed highway improvement should be included in the UDP.

8.24.4 The Council has proposed in the PIMS that paras 6.9.24 & 6.9.25 be amended to delete references to Wern Fawr. For the sake of consistency with the employment land allocations, I consider that these amendments should be made.

Recommendation

8.24.5 I recommend that no modification be made to Policy T16(8).

8.24.6 I recommend that paras 6.9.24 and 6.9.25 be modified as shown in the PIMS.

8.25

POLICY T16.9

Major Improvements to the Highway Network Access to Land West of Maesteg Road, Tondu

Objection

DO/50880/940	Bridgend Biodiversity Partnership
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Issues

8.25.1 These are :

- Whether or not the policy should be removed because of the nature conservation interests in the locality;
- Whether or not the level of highway works outlined in the supporting text of the UDP are justified by the likely development in the locality.

Conclusions

8.25.2 On the first issue, the Bridgend Biodiversity Partnership argues that, unless any biodiversity interest can be protected by planning conditions or obligations, the REG3(3) allocation should be moved. The Council proposes an alteration to the site on the Proposals Map of the UDP, in the interests of nature conservation. I recommend in Chapter 17 that the comprehensive redevelopment of this land would be beneficial and should remain in the UDP. Similarly, I consider that the related road improvement scheme should also be retained.

8.25.3 On the second issue, the objectors argue that it is neither feasible nor necessary to develop land west of Maesteg comprehensively. I address this objection in Chapters 7 (Employment) and 17 (Regeneration). They also contend that planning permission already granted for a northern portion of the site was not conditional on highway improvements, and realignment of the A4063 would not be necessitated by development in the south-eastern sector. Should realignment be needed to access land in the western sector, this should be assessed separately and the UDP amended to explain this. The Council, however, asserts that development of the south-eastern part of the site would have a negative impact on the junction of the A4063 and A4065, and the developer should therefore be asked to contribute to or provide improvements.

8.25.4 I consider that the principle of mixed use development is appropriate for this site (Chapter 17). A supplementary statement on behalf of Rhys-Davies Services Ltd indicates that a full Transport Assessment has not been carried out. In the absence of firm proposals for the site and parts of it, it is premature to judge what the scope of highway works should be to give a successful development. However, I consider that Policy T16(9) appropriately identifies a possible need for road improvements. Clearly, details of contributions/provisions to be sought from individual landowners is not a matter for the UDP. I see no need to change the thrust of this policy.

8.25.5 I agree with the objector that national policy and advice on the use of planning conditions and obligations must be adhered to when planning applications are assessed, and I have already recommended changes to the reasoned justification of this policy elsewhere to make that clear. I accept that the first sentence of para 6.9.27 should be modified to emphasise that planning obligations are reached by negotiated agreement.

Recommendation

8.25.6 I recommend that Policy T16(9) should not be modified.

8.25.7 I recommend that the first sentence of para 6.9.27 be modified along these lines: 'The developers of the site will therefore be asked to enter into negotiations with'.

**Major Improvements to the Highway Network
A48/A473 Brocastle Link, Bridgend****Objections**

DO/51074/1217

Mr N McLean

DO/51194/1482

Welsh Development Agency

Issue

8.26.1 This is whether or not the A48/A473 Brocastle Link is justified to serve planned development in the area and would be sustainable.

Conclusions

8.26.2 On the first issue, the WDA argues that existing developments in Brocastle and Waterton cannot be asked to provide contributions to this new highway scheme. Outline planning permission already exists for the site at Brocastle, and agreements are nearing completion on the provision of a new roundabout access from the A48. The proposed link road would extend through the Vale of Glamorgan administrative area, and its UDP does not cater for such a road. Mr McLean contends that the Vale of Glamorgan objected to the draft deposit version of the UDP which showed the road proposal crossing its land. The Council does not dispute this analysis, and there is no evidence that the neighbouring authority would be prepared to collaborate. I consider that there are serious doubts as to how this link would be funded and completed.

8.26.3 Both WO C13/97 and TAN (Wales) 18: Transport advise that developers should only be asked to pay the cost of any highway improvements which are directly related to their development. In this case, employment allocations at Waterton and Brocastle are located beside the A473 and A48, and the evidence is that development can take place there without the need for this link road. I agree with the WDA that para 6.9.29 of the UDP could impede the development of land at Brocastle and Waterton, and, as worded, is in conflict with paras B16 and B17 of WO C13/97.

8.26.4 No information on traffic movements, capacities or likely impact from new development on the A48 and A473 highway network has been made available, to demonstrate the need for this new link road. Neither is there any evidence that solutions other than new road building, such as the construction of a new rail link as suggested by Mr McLean, might give effective access. Overall, I conclude that this scheme is not adequately justified and may be unrealistic without the support of the neighbouring Authority.

8.26.5 Mr McLean points out that the proposed link road would extend built development into the countryside, contrary to the principles of sustainable development. In reply, the Council merely refers to the independent Sustainability Appraisal, CD21. In that document, Policy T16 scores a series of question marks, indicating that the outcome for sustainability is 'unpredictable'. The authors also write *'the justification for any expenditure on road building should be identified as the impact of highway improvements can generally be expected to be greater car and lorry traffic, whatever the claimed benefits for local environments, economic activity or safety.'* In my opinion, CD21 is not wholly supportive of Policy T16(10) and I agree with the objector that a new road in this position would be harmful to the countryside.

8.26.6 I consider that insufficient justification for this scheme has been provided. However, the surrounding land is identified as a key employment site and I would not wish its development to be constrained if a new road scheme is essential for its success. I conclude that, if this scheme is to be retained in the UDP, the reasoned justification should be substantially enhanced to explain why it is needed and how constraints would be overcome.

Recommendation

8.26.7 I recommend that, if Policy T16(10) is to be retained, the reasoned justification should be substantially enhanced.

**8.27 POLICY T16.12
Major Improvements to the Highway Network
Access to Merthyr Mawr Road/Bridgend Science Park, A48,
Bridgend**

Objection
DO/50075/1392 Mr & Mrs D Morgan

Issue

8.27.1 This is whether or not a new access to the Bridgend Science Park at the Merthyr Mawr Road junction on the A48 is justified.

Conclusions

8.27.2 The objectors question whether or not a second entrance to the Bridgend Science Park site (E6(1)) is required. They argue that the existing access affords good accessibility to the M4, and that another roundabout on the A48 would cause delay to traffic, increase pollution and reduce safety on Merthyr Mawr Road South, which is a narrow country lane. I consider that the Council has failed in its response to objectors to answer the basic question as to why the existing access to the B4265 should not accommodate increased traffic from an extended employment site.

8.27.3 The Highway Authority contends that a new roundabout on the A48 would have a traffic calming effect but, in my view, traffic calming should be achievable without new road building. I consider that, as a matter of good practice, environmental impact should be addressed before the design and construction stages of a proposed road scheme. I share the objectors' concern that a new roundabout at Merthyr Mawr Road could encourage additional and unwanted traffic movements along this country lane.

8.27.4 However, the allocation for special employment land at Island Farm extends to nearly 26has. I consider that intensive development of this site could cause problems at the existing access to the B4265. I am also mindful of the planning application for a national academy for rugby and associated developments at Island Farm. If planning permission were granted for such development, there would be a need for new access arrangements to this site. I conclude that Policy T16(12) should be retained in the UDP, in the event that proposed development necessitates new site access arrangements.

Recommendation

8.27.5 I recommend that no modification be made to policy T16(12).

8.28 POLICY T16.16 Major Improvements to the Highway Network Brackla Industrial Estate Access Road, Bridgend

Objections

DO/50864/895	Coity Village Association
DO/50864/898	Coity Village Association
DO/50864/899	Coity Village Association

Issue

8.28.1 This is whether or not this proposal would adequately serve the Brackla Industrial Estate whilst offering an acceptable solution to current and potential traffic in and around the village of Coity.

Conclusions

8.28.2 As explained in section 8.18 above, the Council proposes changes to the designations in Policies T16(1) and T16(16) together with an amended reasoned justification for Brackla Industrial Estate Access Road. The objector argues that improvements in the road network south of Coity are needed so that planned new residential and industrial developments do not exacerbate existing problems in the village. The Highway Authority acknowledges that the Coity Bypass is essential if the Parc Derwen housing development is to be accomplished, and its traffic assessment suggests that the bypass should be provided as soon as 300 new dwellings have been built there. However, the Brackla Industrial Estate Road to the south is not perceived as necessary for Parc Derwen to proceed. Support for this improvement scheme should come from development on the industrial estate itself and the R9(1) retail site.

8.28.3 I am satisfied with the proposed changes to T16(1) and T16(16), and consider that the intended timing of the new Coity bypass is based on a reasonable assessment of the likely traffic impact from the Parc Derwen housing development on the village of Coity. I conclude that the Brackla Industrial Estate Road as amended should meet the objector's wishes and should serve east-west traffic and access to the Industrial Estate.

Recommendation

8.28.4 I recommend that the changes to the designations in Policies T16(1) and T16(16) together with an amended reasoned justification for Brackla Industrial Estate Access Road, as put forward in the Council's Proof of Evidence (Parc Derwen Doc 4) responding to the objections, should be made.

8.28.5 I recommend that the amended paragraphs be further modified to delete the phrase 'there is a requirement on E2(1) and R9(1)'. Wording along the lines 'developers of sites E2(1) and R9(1) will be asked to contribute to highway improvements' should be substituted. (see my section 8.18 for reasoning).

8.29

POLICY T16.17

Major Improvements to the Highway Network Bryncethin By-Pass

Objections

PCO/50934/2155	Dr J R Anthony
PCO/50880/2165	Bridgend Biodiversity Partnership
PCO/51185/2154	Coity Walia Commoners Association
PCO/51209/2229	Countryside Council for Wales
PCO/51199/2153	Mr H Griffiths
PCO/51234/2158	Mr & Mrs C & J M Jarvis
PCO/51235/2160	Mr J G Jones
PCO/51235/2159	Mr J G Jones
PCO/51223/2157	Mr & Mrs F J & M V Thorne

Issue

8.29.1 This is whether or not the proposed Bryncethin Bypass should be included in Policy T16.

Conclusions

8.29.2 The PIMS recommends the addition of this highway scheme east of the village, as per the Ogwr Borough Local Plan, with alterations to paras 6.9.1-6.9.3 of the UDP. However, the Council provides no substantial highway or traffic flow evidence or environmental appraisal to justify the reinstatement of the scheme. Para 6.9.3 of the UDP indicates that improvements have already achieved some benefits along this part of the road network. In section 8.23 above, I conclude that there is no substantial case for the proposed Bryncethin Link. I consider that most of the arguments against major new road building there apply equally to the proposed Bryncethin Bypass. In particular, the Council concedes that the bypass is not essential for development envisaged at Sarn Park and admits that the benefit calculated using COBA 'is not great'.

8.29.3 The environmental effects of the proposed Bypass have not yet been fully assessed, but the counter-objectors identify a number of potential problems associated with the proposed new road building. These include loss of property, loss of common land and wildlife habitats, severance of a viable farm holding, reduced local access, localised drainage problems and the transference of traffic noise, pollution and visual intrusion. In the absence of clear justification for a bypass and these potential problems, I shall not recommend inclusion of Bryncethin Bypass within Policy T16.

Recommendation

8.29.4 I recommend that the Bryncethin Bypass as proposed in the PIMS should not be included in Policy T16(17).

8.30 POLICY T17 Extension to Bridgend Bus Station

Objections

DO/50001/914 Bridgend Civic Trust
DO/51192/1452 Llynfi Valley Forum

Issues

8.30.1 These are:

- Whether Bridgend bus station should be extended or whether it should be relocated to Brackla Street;
- Whether or not a coach park in Maesteg town centre should be identified in the UDP.

Conclusions

8.30.2 On the first issue, the Civic Trust favours the concept of a transport interchange, but argues that the bus station should be relocated to make the interchange work properly. If located on the existing Brackla Street car park, it would be easily accessible for buses, and convenient for pedestrians using the rail station or town centre. Traffic movements could be simplified and the current bus station used for retail purposes, in the view of the objector.

8.30.3 The Council indicates that relocation of the bus station to Brackla Street has been assessed, and has been the subject of consumer and bus operator surveys. The Council concluded that extension of the existing bus station was a better option, and has included the proposal in an integrated investment programme under the Transport Grant initiative. It seems to me that the Council's proposed extension of the bus station is soundly based. It has considered alternative sites, and proposes, in Policy T18, a road link between the bus and rail stations. Moreover, the Brackla Street site is appropriately allocated for retail and other town centre uses. I conclude that extension of the existing bus station in Bridgend is reasonable.

8.30.4 On the second issue, Llynfi Valley Forum argues that a coach park is needed in Maesteg to encourage tourism and recreation at the town hall. The Council replies that this should form part of the Local Transport Plan (LTP) and Transport Grant process, and the need for it should be assessed as part of a comprehensive town centre or regional regeneration strategy. I consider that this matter should be pursued through the LTP process and that there is no need for a specific policy reference in the UDP.

Recommendation

8.30.5 I recommend that no modification be made.

8.31 POLICY T18 Proposed Bridgend Transport Interchange

Objection

DO/50001/915 Bridgend Civic Trust

Issue

8.31.1 This is whether or not the UDP should favour relocating the existing bus station at Brackla Street car park.

Conclusions

8.31.2 The Civic Trust argues that this would give ready interchange with the rail station, offer sufficient land for a taxi rank and eliminate the need for some difficult crossover traffic movements. However, for the reasons given in section 8.30 above, I am content for the bus station to be retained at its current site with a road link to the rail station, which will be enhanced as envisaged by Policy T18.

Recommendation

8.31.3 I recommend that no modification be made.

8.32 POLICY T19.1 Improvements to the Passenger Rail Network

Objections

DO/50001/918

Bridgend Civic Trust

DO/51054/1182

Clerical & Medical Group

Issues

8.32.1 This is whether or not the UDP fairly shows the land take for the proposed Brackla railway station and park and ride facility.

Conclusions

8.32.2 The Clerical and Medical Group argues that the new rail facilities should be shown diagrammatically only on the Proposals Map, to allow maximum residential development on the adjoining land and flexibility if extensions to the parking facility are required in the future. The Civic Trust seeks the provision of substantial parking space on the industrial estate side of the railway track to encourage use of this proposed station rather than Bridgend station.

8.32.3 The Council has put forward a proposed change in the PIMS whereby the proposed new rail and park and ride facility would be shown by a star notation. The Council advises that a planning application has been submitted for development in this locality by the Clerical and Medical Group and the detailed design has been progressed. I consider that the change proposed in the PIMS satisfactorily identifies the location of the proposed facility, the precise boundaries of which may be determined through the development control process. Equally, any need for A1/A3 uses in connection with the rail station would be for detailed consideration and not for the UDP.

8.32.4 The scheme is part of a regional SWIFT transport strategy which has been approved by the National Assembly for Wales. The Council informs that a significant park and ride facility to the north of the proposed station will be served by a pedestrian/cycle bridge giving access to the industrial estate, and by enhanced bus services. I have taken account of the Civic Trust's suggestions as to how a new station and park and ride facility might operate,

but my conclusion is that there is no need for further modification of Policy T19 of the UDP arising from these comments.

Recommendation

8.32.5 I recommend that Policy T19(1) be modified as shown in the PIMS, Map Ref: A1.

8.33 POLICY T20 Proposed Park & Ride Facility Serving Porthcawl

Objections

DO/51223/1744 Coney Beach Leisure
DO/51217/1731 Mr R H Knight & Mr J Blundell

Issues

8.33.1 These are:

- Whether or not the proposed park and ride site would be needed for the functioning of Porthcawl town centre and the town's recreational facilities, bearing in mind the regeneration strategy which is proposed;
- Whether or not the proposed park and ride site would be harmful to countryside, conservation and agricultural interests.

Conclusions

8.33.2 Coney Beach Leisure argues that the loss of existing town centre car parks to redevelopment and their replacement by a park and ride scheme would pose a threat to shopping, tourism and leisure in Porthcawl. The Council advises that, if Policy R8(6) goes ahead, some 80% of the public off-street car parking spaces in the town centre will be lost to new retail development. The Council also draws attention to the Ogwr Borough Local Plan which aims to limit vehicular access in the town centre to essential movements, and give greater emphasis to the pedestrian and shopping environment. It considers that the proposed park and ride scheme would be consistent with this approach.

8.33.3 In my view, policies to encourage public transport use and reduce reliance on the private car, combined with pedestrianisation in major shopping streets, should improve the environment of Porthcawl and make it more attractive to visitors. The pedestrianisation of John Street appears to have produced a lively and attractive shopping street, seemingly without the consequences which the objectors fear.

8.33.4 Messrs Knight and Blundell argue that park and ride schemes are generally successful where there is a high level of demand for car parking, traffic congestion and a lack of available public parking space. It was agreed at the Inquiry that these conditions do not currently exist in Porthcawl. Though access to the resort has occasionally been restricted in co-operation with the police on Public Holidays when the weather has been good, I consider that these occasions alone would be an insufficient basis for a new permanent park and ride facility. I agree with the objectors that much of the town is within walking distance of the coast and/or the town centre, and that parking restrictions are not widespread. The park and ride site would

be relatively near to the final destination for many visitors to the resort, which could also discourage its use.

8.33.5 The Council argues that the need for the park and ride facility would arise if the regeneration strategy were successfully implemented in Porthcawl, and this could occur before the end of the UDP period. However, the strategy is not well advanced, and the substantial area to be redeveloped should, in my view, have scope for its own car parking provision. Neither has the Council provided any estimates of likely numbers or types of users of a park and ride facility. At the Inquiry, the objectors drew a comparison between Porthcawl and towns or cities in England where park and ride schemes are in operation. They argue that the English schemes are based on larger settlements, where there are all year round facilities and a wider range of activities for visitors than would be offered in Porthcawl.

8.33.6 In 1994, W S Atkins and DTZ Debenham Thorpe carried out a traffic and development appraisal of the Porthcawl Resort Regeneration Strategy (CD124). Although this study is now quite dated, I consider that its conclusions on park and ride 'not a very appropriate option' remain relevant. All these considerations lead me to the view that park and ride may not be suitable or viable in Porthcawl, and its identification in the UDP would be premature.

8.33.7 The Council also argues that, as railway access to Porthcawl is not available, it is important to identify all opportunities to improve access by bus and coach. PPWales favours park and ride to improve the relative attractiveness of public transport. However, I see no reason why public transport services could not be promoted as part of the regeneration of Porthcawl, without the provision of a park and ride facility. Overall, I conclude that the proposed park and ride site is unlikely to be needed for the functioning of Porthcawl town centre and the town's recreational facilities, even with successful implementation of the proposed regeneration strategy.

8.33.8 On the second issue, the objectors contend that there would be substantial development of a greenfield site in the countryside which would be contrary to national and local planning policies. In addition, the site is located close to Nottage Conservation Area, is on land of high agricultural value and within a special landscape area. Though the Council advises that it has looked at alternative sites near to Junction 37 and has discussed the location of the facility with the police, I consider that the preferred site possesses a number of constraints. In my opinion, even a modest park and ride development on the site shown in the UDP would have a physical and visual impact on the surrounding area. It would be in conflict with policies in the Environment chapter and harmful to countryside, conservation and agricultural interests. I agree with the objectors that this policy should be deleted.

Recommendation

8.33.9 I recommend that Policy T20 be deleted from the UDP.

8.34 POLICY T21.1
Proposed Public Off-Street Car Parking Provision, Bridgend Town Centre
The YMCA Site, Angel Street, Bridgend

Objections
DO/50001/919 Bridgend Civic Trust

Issue

8.34.1 This is whether or not the site occupied by the YMCA in Angel Street should be allocated in the UDP as a town centre off-street car park.

Conclusions

8.34.2 The objectors contend that the YMCA is too valuable a facility to remove, and requires a town centre site. The Council argues that the YMCA site is one of three locations safeguarded under Policy T21 for off-street car parking which are necessary to achieve the pedestrianisation and regeneration of the town centre. All these sites are located within the 'highway box' which encircles the town centre and the YMCA site is well placed to serve the western side of the town centre.

8.34.3 The Bridgend YMCA Business Plan identifies five main specialist areas on which it will provide high quality programmes. These are: personal and social development; sports, health and fitness; drug and alcohol awareness; education and training; access to affordable, appropriate housing. Evidence brought to the Inquiry indicates that the YMCA facilities are well used, for example the drop-in facility records over 1,000 users a month. More than 300 people, many of whom describe the various uses which they make of the facility, have signed a petition objecting to the proposal to replace the YMCA with a car park. I consider that the present facilities provide a very beneficial and valuable social asset, important to the health and future well-being of the local community in the County Borough.

8.34.4 The objectors argue that the YMCA should remain in the town centre where public transport accessibility from all the County Borough is good, and where access on foot is possible for some users. The present site has the advantage that it is close to leisure and sporting facilities in the town. I agree that the removal and relocation of YMCA premises could undermine the network of volunteers and groups who currently support the activities. I consider that the organisation's traditions and independence also contribute to its ongoing success. These could be weakened if the YMCA were relocated in a proposed 'Life Centre' in Brackla Street as suggested by the Council at the Inquiry. PPWales para 10.2.4 advises that a *diversity* of uses should be encouraged in town centres. In my opinion, the YMCA provides a very important town centre use for the County Borough, which should be fostered and not abandoned in the pursuit of more commercial regeneration.

8.34.5 The objectors argue that the allocation of the site as a car park has adversely affected the search for funds. The YMCA has been unable to secure finance for refurbishment of its buildings and only essential maintenance has been carried out. Key funding sources look for a guaranteed minimum term of tenure up to 30 years as a prerequisite for making grants. I consider that the facilities at Angel Street are likely to deteriorate substantially, if the YMCA remains there and the car parking allocation is kept in the UDP.

8.34.6 The Council's evidence on the utilisation of car parks indicates that there is currently adequate short stay capacity in the town centre, and this situation is likely to continue in the short term, even if the Embassy cinema site is developed for retailing. The Council argues that additional parking facilities are required to assist town centre regeneration and increase footfall. Whilst public transport will cater for half the anticipated increase in visitors, the Council estimates that there will be a 2% a year increase in parking demand over the period of the UDP. Though the source of the 2% estimate is not explained, it asserts that the YMCA site would be required for car parking purposes to meet the forecast demand.

8.34.7 PPWales para 8.4.2 calls on local authorities to provide lower levels of car parking than have been achieved in the past. In consultation with neighbouring authorities, they should establish maximum levels of parking for broad classes of development. The Council argues that it is seeking to reduce long stay car parking in the town centre by, among other things, developing a Green Travel Plan for Council staff to encourage commuting by public transport. It is pursuing the question of maximum parking standards with neighbouring authorities. However, it seems to me that the approach to town centre parking in the UDP is very similar to that in the Ogwr Borough Local Plan, adopted at a time when parking policies were more liberal.

8.34.8 The Council draws my attention to PPWales para 10.2.6 which indicates that good short term car parking facilities can help town centres compete with out of town centres. It considers that Bridgend town centre could benefit from linked trips by visitors to the Welsh designer outlet at Junction 36 on the M4, providing adequate car parking is available. However, I have seen no estimates as to how many shoppers might make such linked trips, nor why they should not be catered for by bus travel.

8.34.9 I agree with the Council that the YMCA site is conveniently located for a car park just inside the 'highway box' within walking distance of the town centre's main facilities. I appreciate that a new access from the A473 Inner Bypass to the car park would provide a useful traffic calming function. However, whilst convenient car parks may complement town centre regeneration measures, they will not themselves produce new investment and revitalisation.

8.34.10 The Council has recently indicated its willingness for greater flexibility in respect of the town centre highway access and parking scheme. It has responded favourably to proposed retail development on the old Embassy Cinema site with a reduced element of public parking, and has granted permission for office development on the former Courage Depot car park site. I consider that this is the right approach in terms of revitalising Bridgend centre and promoting a more sustainable environment, in that it gives priority to the attraction of new and key town centre uses (retail and commercial), and secondary consideration to car parking.

8.34.11 The Council argued at the Inquiry that, in the absence of a new car park on the YMCA site, regeneration of the Rhiw or Brackla Street sites could be prevented, and the strategy for town centre regeneration undermined. However, I have seen no substantive evidence to support this assertion which was also made, but not sustained, in respect of the former Embassy cinema site. The proposal for the Embassy Cinema site includes an element of car parking, and I see no reason why proposals for some of the other key redevelopment sites in the town centre should not do the same. Indeed, I am advised of a recent planning application for an Asda foodstore with 460 car parking spaces on another town centre site. Car parking within redevelopment schemes may mean a departure from the original engineering concept of only building car parks next to the 'highway box', but in my view would not be harmful so long as the town centre's pedestrianisation scheme is respected.

8.34.12 I have taken account of the objectors' evidence that the neighbouring site with the Driving Examination Centre and County Court would provide a more suitable site for town centre car parking than the YMCA site. Whether or not these uses would be easier to relocate than the YMCA, I consider that they too add to the diversity of town centre uses which are essential for the long-term prosperity and vitality of Bridgend town centre. I shall not recommend that they are displaced in favour of car parking.

8.34.13 My predecessor at the Ogwr Borough Local Plan concluded that the need for town centre car parking and the absence of acceptable alternative sites outweighed the existing

beneficial use of the site by the YMCA. I too have undertaken a balancing exercise of similar factors. However, in the light of new national planning policy for car parking provision, and because I consider that there is scope for providing car parking in alternative locations in the context of a changing and redeveloping town centre, I reach a different conclusion from the previous Inspector. I conclude that the site occupied by the YMCA in Angel Street should not be allocated in the UDP as a town centre off-street car park.

Recommendation

8.34.14 I recommend that Policy T21 be modified so as to exclude site T21(1) The YMCA site, Angel Street, Bridgend.

8.35 POLICY T21.3
Proposed Public Off-Street Car Parking Provision, Bridgend Town Centre
The Embassy Cinema Site & Adjacent Land at Brewery Lane and Tondu Road, Bridgend

Objections

DO/51182/1404	Aldi Stores (Swindon) Ltd
DO/50001/921	Bridgend Civic Trust
DO/51164/1313	Centre Great 1991 Ltd
DO/51164/1367	Centre Great 1991 Ltd
DO/51175/1390	Mr W M Davies
DO/51142/1393	Henley H Jenkins Ltd
DO/51155/1349	Riverside Hardware & Engineers Supplies

Issues

8.35.1 These are:

- Whether or not the existing commercial uses on the site should be retained;
- Whether or not the site should either retain the existing buildings or be redeveloped with new buildings of merit so as to provide an attractive entrance to the town centre and take advantage of its riverside position;
- Whether or not the site should be allocated for retail use rather than car parking.

Conclusions

8.35.2 On the first issue, Henley H Jenkins Ltd argues that the site includes established commercial uses which have served the town well for many years. This area has been affected by new road building and the operation of a contractors' yard to implement the town centre pedestrianisation scheme. These works are now ending and there is an opportunity for regeneration by the established traders, which would be thwarted by the proposed car park allocation. Though I have sympathy with the objector, it seems to me that the site is rundown in appearance, and the Council is entitled to consider new uses for the future.

8.35.3 On the second issue, the Civic Trust and others refer to the prominent position of this site, and its location as a 'gateway' site for visitors to Bridgend. I recognise its position in relation to the Town Centre and Newcastle Hill Conservation Areas, and agree that a car park use might not preserve or enhance views in and out of those areas. Though CADW have concluded recently that the existing Embassy Cinema is not of sufficient quality to be listed, I agree that it is imposing and a local landmark. Objectors argue that the existing Embassy building could be adapted to house cultural and leisure activities to improve the town's image and generate revenue. However, the Council having looked at alternative sites is pursuing such a scheme for a 'Life centre' at a site on Brackla Street. I consider that, if new development takes place on this site, the buildings should be well designed and, if possible, should take advantage of their riverside location. However, this should not rule out redevelopment of the site.

8.35.4 Turning to the third issue, since publication of the deposit UDP and the PIMS, the Council has agreed with Aldi Stores Ltd to allocate this site for retail use instead of car parking under Policy R8 of the Plan. As I report in Chapter 9, I consider that the site is eminently suitable for retail use and I recommend modifications to add this to the key retail redevelopment sites. The Council and Aldi have submitted an agreed statement which would delete Policy T21(3) and add a new paragraph 6.11.4 to indicate that the site would provide some short stay car parking to serve the town centre as well as customers to the proposed foodstore.

8.35.5 Aldi Stores Ltd have demonstrated that town centre regeneration would not be prejudiced if this site made a lesser contribution to the provision of short term car parking for the town centre than was envisaged in Policy T21. I consider it important that this site should continue to provide some town centre car parking, and support the changes to the UDP which have been agreed. Henley H Jenkins Ltd argues that the objection site should not be allocated for a town centre *foodstore*, but should be allocated for 'retail, other commercial and complementary uses' like the other sites in Policy R8. I agree with this, but conclude that this site should not be allocated for car parking.

Recommendation

8.35.6 I recommend that Policy T21(3) be deleted and a new paragraph 6.11.4 added as agreed between Aldi Stores (Swindon) Ltd and the Council.

**8.36 POLICY T22
Detailed Transportation Guidelines & Standards for New Developments**

Objections

DO/51203/1558 House Builders Federation
PCO/51203/2169 House Builders Federation

Conditionally Withdrawn
DO/51227/1804 Harmer Partnership
DO/51229/1862 National Assembly for Wales

Issue

8.36.1 This is whether or not the policy is too onerous in requiring conformity with SPG and adopted guidelines and standards on transportation.

Conclusions

8.36.2 The NAW argues that it is not acceptable to have a policy which simply requires compliance with SPG, references to which should be confined to the reasoned justification. The Harmer Partnership objects that the policy refers to a range of existing and proposed SPG of undefined status and makes no mention of the need for public consultation. The Council has proposed changes to the policy in the PIMS which would remove the second part of the policy to the reasoned justification and offer assurance that the documents would be subject to wide consultation. The objections have been withdrawn on the basis of these proposed changes, although the HBF sustains its objection that the policy still refers to standards not set out in the Plan.

8.36.3 I share the concerns of the HBF that, even with the PIMS proposed modifications, the policy would require conformity with a range of as yet unknown guidelines and standards. I agree with the HBF that a policy defining the overall objectives for access to new development and parking, with a reference to emerging SPG, would be appropriate and desirable. However, the Council's evidence provides no information on its objectives. These might include (a) safe and convenient access for vehicles and pedestrians with minimal harm to the amenities of neighbours; (b) access arrangements which respect the character and appearance of the local area; (c) parking of sufficient quantity to enable the land use to function effectively; (d) parking levels consistent with the aim of reducing reliance on the private car; and (e) parking levels which would avoid regular shortage of spaces in locations where overspill parking would be hazardous to other road users.

8.36.4 However, it is for the Council to define its objectives and include them in a simple policy defining what is expected in terms of access and parking arrangements. I conclude that the policy as drafted is too imprecise and could be too onerous, and that a revised policy encapsulating the main aims of detailed transportation policy should be substituted. I consider that the proposed amendment in the PIMS should be relegated to the reasoned justification.

Recommendation

8.36.5 I recommend that Policy T22 should be modified.

8.36.6 I recommend that Policy T22 as proposed for modification in the PIMS, should be included in an expanded para 6.12.2, only as part of the reasoned justification.

8.37 POLICY OMISSION Highway Improvements

Objection

DO/51209/1663

Countryside Council for Wales

Issue

8.37.1 This is whether or not a new policy is required to ensure that highway improvements are undertaken in sympathy with the environment and the needs of pedestrians and cyclists.

Conclusions

8.37.2 I agree with the Council that Policies T1 and T2, with the modifications which I recommend, provide sufficient guidance to developers on achieving sustainable development which recognises the needs of users of all travel modes and is not harmful to the environment. I see no reason for a new policy as proposed by the objector.

Recommendation

8.37.3 I recommend that no modification be made.

8.38 POLICY OMISSION General Aviation Issues

Objection

DO/51027/1140 General Aviation Awareness Council

Issue

8.38.1 This is whether or not the UDP should include a policy on general aviation.

Conclusions

8.38.2 The objector argues that a policy should be included in the UDP, to provide clear guidelines to any potential operator who may wish to establish a landing strip within the Bridgend area. A criteria-based policy is put forward for inclusion in the Plan. The Council argues that there is no perceived need for aviation facilities in the County Borough because of proximity to Cardiff International Airport. Although it is conceivable that a developer might propose a new landing strip, I agree with the Council that the location of Cardiff International Airport would make this less likely than in some other local authority areas. The criteria in the proposed policy cover a range of planning considerations, all of which are already addressed in policies in the UDP. I consider that the UDP would provide an adequate framework for weighing the positive and negative effects which might arise from a proposal for a general aviation facility. I therefore see no reason for an additional policy on general aviation.

Recommendation

8.38.3 I recommend that no modification be made.

8.39

POLICY OMISSION

Bus Prioritisation Scheme

Objection

DO/51186/1427

Vale of Glamorgan Council

Issue

8.39.1 This is whether or not the UDP should include a policy which seeks to enhance the role of buses on the corridor between Bridgend and Cardiff.

Conclusions

8.39.2 The objector argues that the A48 is identified as a potential bus corridor in the South Wales Integrated Fast Transit Strategy (SWIFT). In the interests of consistency across the sub-region, the Bridgend UDP should include a policy on public transport similar to that in the Vale of Glamorgan UDP.

8.39.3 The Council argues that future bus improvements and their funding are dependent on land use developments and the annual Transport Grant cycle. The LTP process offers a more suitable mechanism than the UDP for promoting public transport improvements. I agree that duplication should be avoided, and that policies should not simply be statements of intent. However, Policy T15(6) of the UDP identifies A473-A48 as a major corridor within the County Borough, and para 6.8.5 indicates that the corridors will be managed to promote public transport. I consider that it would assist developers and meet the objector's call for consistency between UDPs if there were a reference in the Plan to the bus corridor between Cardiff and Bridgend where bus priority measures would be sought. I consider that appropriate text could helpfully be added to para 6.8.28 of the UDP.

Recommendation

8.39.4 I recommend that para 6.8.28 of the Plan be extended to indicate that bus priority measures on the A48 will be sought to provide improved services between Bridgend and Cardiff, in line with the SWIFT strategy.