

Mrs Nicola Gulley,
Inspector,
Planning and Environment Decisions Wales,
Crown Buildings,
Cathays Park,
Cardiff,
CF10 3NQ

4th July 2023

Dear Mrs Gulley,

Replacement Bridgend Local Development Plan 2018 – 2033 Inspector's Note – Targeted Policy Changes to Planning Policy Wales on Net Benefit for Biodiversity and Ecosystems Resilience

I refer to your note on the above, have reviewed the contents of the consultation document and assessed the implications of the proposed targeted policy changes for the Bridgend Replacement Local Development Plan (RLDP).

The maintenance and enhancement of biodiversity has been embedded into the RLDP's evidence base, preparation and written statement in a manner that already complies with the proposed changes. In doing so, the RLDP will promote the resilience of ecosystems, minimise impacts on biodiversity and provide biodiversity enhancement (net benefit), where possible, while protecting or enhancing green infrastructure provision in recognition of its wide-ranging benefits. As drafted, I consider that the Written Statement will not prejudice implementation of the targeted changes proposed to PPW.

The Council has ultimately considered biodiversity and the natural environment from the outset of the RLDP's preparation. The step-wise approach to maintaining and enhancing biodiversity has already been followed in terms of the site selection process and policy development. The RLDP has sought to ensure any adverse environmental effects are firstly avoided, then minimised, mitigated, and as a last resort compensated for. The final selection of sites and policy framework have determined by considering robust evidence and a detailed SA process and Candidate Site Assessment.

The SA, incorporating SEA, assessed the likely sustainability and significant environmental effects of all substantive components of the RLDP (strategy, policies, site allocations, etc.) and any identified reasonable alternatives. The SA identified sites designated at international, national or

local level for reasons of biodiversity conservation, geological importance, heritage or landscape value with the potential to be affected by the RLDP. This drew upon the HRA prepared to accompany the Deposit Plan. The site-specific context of all identified designated sites was considered when characterising the sustainability baseline position and identifying the relevance of existing issues and problems to the RLDP. This review also identified associated existing environmental and socio-economic problems and issues which the RLDP should address and which should be considered throughout the SA (incorporating SEA) process. This holistic process informed a suite of mitigation measures, ensuring the RLDP was developed to:

- Maintain, protect and enhance biodiversity including important species and sites designated for reasons of biodiversity conservation or ecological importance;
- Safeguard and enhance the green infrastructure network and to maintain and enhance connections between designated sites and habitats; and
- Protect and enhance ecosystem resilience.

All policies have been developed comprehensively to this end. Changes have also been proposed post Deposit Stage to better clarify how the RLDP will maintain and enhance biodiversity (providing a net benefit for biodiversity) and enable a proactive approach towards facilitating the delivery of biodiversity and resilience outcomes.

SP17 in particular has been strengthened through the SA process and modified post Deposit Stage Consultation in a manner that already accords with the targeted changes to PPW. It sets out holistic and positively worded introductory paragraphs relating to the environmental assets, green infrastructure and important features (ecological and landscape) of the County Borough which should be maintained and enhanced. This provides a clear environmental strategy, highlighting the RLDP's environmental priorities, before setting out associated development management criteria. These criteria require all development proposals to maintain and enhance the natural environment and to avoid adverse effects on biodiversity and habitats. In accordance with statutory and Welsh Government policy requirements, SP17 also sets out criteria to protect sites designated at national and international level for reasons of ecological importance (including SSSIs), whilst also identifying the relevance of locally designated SINCS. It sets out detailed requirements for proposals likely to have direct and indirect adverse effects on SPA, SAC and Ramsar sites to be subject to an HRA. Read as a whole, Policy SP17 therefore provides a sound basis to allow ecological considerations to be taken account of in planning decisions and will directly help to maintain, protect and enhance biodiversity interests, directly in accordance with the targeted policy changes to PPW on net benefit for biodiversity and ecosystems resilience.

SP17 is supported by a suite of thematic policies (DNP1 – 9) to set out clear requirements for development to minimise pollution, enhance green infrastructure, deliver biodiversity net benefit, enhance ecosystem resilience, protect designated sites, and achieve sustainable management of natural resources. In particular, Policy DNP6 has been enhanced post Deposit Stage to ensure that the mechanics of delivery are correctly expressed to ensure a net benefit approach is fully embedded in the RLDP. This is already in direct accordance with the targeted policy changes to PPW.

Equally, the distribution of housing sites is concentrated within Sustainable Growth and Regeneration Growth Areas. These have been assessed by the SA and Candidate Site Assessment as being the most appropriate to accommodate the scale of housing required to meet identified needs in a sustainable manner. All proposed allocations and reasonable alternative options were subject to SA to inform the selection of the site allocations. The housing strategy set out within SP6 limits urban extensions, only seeks to meet identified needs, prioritises brownfield land redevelopment and includes a presumption against development outside of settlement boundaries, which will help to protect habitats from development pressure. Directing housing development to sustainable locations in this manner combined with the aforementioned policy coverage will minimise impacts on habitats and ecological interests and maintain existing biodiversity features and ecosystems on-site where possible.

The RLDP has also been informed by a Green Infrastructure Assessment, with the aim of promoting a green infrastructure approach to strategic planning, urban design and management. This Green Infrastructure Assessment provides a baseline of information to support the development and integration of green infrastructure in the RLDP. It demonstrates how green infrastructure can contribute to the overall mitigation of planned development and associated population in several ways. Development proposals are expected to maintain, protect and enhance Bridgend's green infrastructure network and ensure that individual green assets are retained wherever possible and integrated into any new development. The SA also provided recommendations for masterplan development principles for strategic sites, including design and policy level mitigation. These recommendations included creation of multi-functional green infrastructure networks both within the sites and wider connections between ecosystems where possible.

Indeed, green infrastructure has been a key consideration in the site selection and design of the proposed developments. Early consideration of how green infrastructure will be integrated into a development has been factored into each allocation's indicative masterplan, which have been embedded into the RLDP post Deposit Stage for completeness. The masterplans detail connections within and between ecosystems (where possible) and have sought to maintain the largest possible areas of existing habitat supporting biodiversity and functioning ecosystems, retaining existing features (e.g. trees, hedgerows) and improving ecosystem resilience. This will help form part of the baseline to understand the extent and condition of these ecosystems at planning application stage, so that they are better able to resist, recover and adapt to pressures post development. Green infrastructure forms an integral and significant part of development and wider infrastructure proposals as detailed within the RLDP, in direct alignment with the targeted changes to PPW.

All strategic policies (PLA 1-5) have also been enhanced post Deposit Stage to include details of the nature and scale of the biodiversity enhancement that will be secured as part of the development of each strategic site. This will ensure clarity for all parties, including existing and potential linkages with wider green infrastructure networks. This will set the framework for developers to consider how proposals can contribute to ecosystem benefits as part of wider green infrastructure and resilient ecological networks from the outset.

In summary therefore, it is considered that the RLDP's evidence base, notably the SA incorporating SEA, has informed a robust framework that already accords with the targeted policy changes to PPW on net benefit for biodiversity and ecosystems resilience. Policy enhancements post Deposit Stage have only served to further ensure accordance with forthcoming national policy changes in this respect. The Council does not consider any substantive changes to the RLDP necessary in light of the proposed targeted policy changes. This equally applies to the proposed consequential changes to minerals and water and flood risk. As drafted, the Written Statement will not prejudice implementation of the targeted changes proposed to PPW should these changes be made as drafted.

A Biodiversity and New Development SPG is scheduled for publication within a year of RLDP adoption, which will only further strengthen the RLDP's approach in this respect. This can, for example, detail minimum tree canopy cover targets along with any other detailed final changes made to PPW. It is acknowledged that the targeted policy changes could still be subject to further changes post consultation and are currently draft proposals. However, any further targeted changes that do take place to PPW (post adoption of the RLDP) will be addressed within this SPG to future proof the RLDP in this important policy area.

Yours Sincerely



Richard Matthams,
Strategic Planning and Transportation Manager